



PACIFIC HARBOR LINE



Andrew C. Fox
President

January 21, 2009

Dr. Ralph Appy
Director of Environmental Management
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731

Dear Dr. Appy:

Pacific Harbor Line (PHL) is hereby submitting its comments on the Wilmington Waterfront Development Project Draft EIR.

The penultimate sentence of the last paragraph of Page 10 (Traffic Improvements) of the draft report states: "Additionally with the vacation of Avalon Boulevard south of A Street, Broad Street would replace Avalon Boulevard as the main access street for automobile traffic on the east side of the proposed project site and continue through to the waterfront, providing access to the waterfront promenade and Bannings Landing Community Center."

This description fails to mention that the primary access to this location will not be via Broad Ave. but via the new Lagoon Ave. grade separation which will carry all traffic over the railroad tracks without a grade level crossing. As you know the Berth 200 rail yard project will move the current Pier A switching yard to the Berth 200 site. The design of that yard is such that all switch moves will take place to the west, crossing the proposed Broad Ave. grade crossing. That means that this crossing will be occupied with trains many, many more times per day and for longer periods than is the current Avalon grade crossing.

With the Lagoon Ave. grade separation, there is simply no need for a Broad Ave. crossing. Drivers will soon learn to take Lagoon if they want to avoid delay. Further, construction of the crossing and the increased rail traffic will result in several times the current amount of train horn sounding per day than are currently sounded at Avalon Street. Imagine the effect this will have on the public drawn to the waterfront. Whereas elimination of this crossing, as well as the Fries Ave crossing, made possible by the Lagoon Ave. grade separation, will create a virtual quiet zone for trains moving on the mainline all the way from Henry Ford to Figueroa.

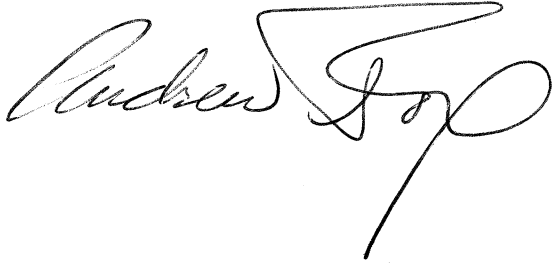
Construction of the Broad Ave. crossing together with the associated frustration of motorists trying to get across will make that crossing extremely hazardous. The current Avalon Blvd. crossing is but a single track. The proposed Broad Ave. crossing will consist of no less than four tracks. It is widely recognized amongst traffic engineers that multiple track crossings are much more hazardous as impatient motorists often run around the gates as soon as one train passes just to collide with a different train entering the crossing on a different track. Combine this with near total the lack of visibility to the west that will be created by the Land Bridge/Pedestrian Water Bridge and this is a recipe for disaster.

The purpose of grade separations is to enhance safety, improve traffic circulation and secondarily to eliminate noise. To build a multimillion dollar separation and then construct a totally redundant grade crossing is antithetical. PHL submits that if an automobile crossing is really wanted in that vicinity, then the Land Bridge be widened just enough to accommodate two traffic lanes to carry this traffic over the tracks.

The plan also shows extending the Waterfront Red Car Line to Wilmington. While this aspect of the plan is vague on details suffice it to say that temporal separation with rail freight operations, which exists today in on the San

Pedro waterfront is not an option if the Red Car line extends north across Harbor Blvd in San Pedro. It will require an entirely separate track. There are standards for the degree of separation that must be maintained between heavy and light rail operations on parallel tracks and these will need to be observed. PHL will need sufficient room adjacent to its (freight) track to be able to conduct normal maintenance operations using off track machinery without interference from light rail operations. Also the light rail track would have to cross at grade both the North Gaffey Street spur track and the Conoco Phillips spur track. The FRA and CPUC are generally opposed to such crossings and at a minimum these will require full interlocking signalization to protect both light rail and freight train movements.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Andrew J. Lopez". The signature is fluid and cursive, with a large, stylized initial "A" and "L".