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August 13, 2008

U.S. Army Corp of Engineers,
Los Angeles District Regulatory Division
c/o Spencer D. MacNeil, D.Env.
ATTN: VESPL-RG-2004-00917-SDM
P.O. Box 532711
Los Angeles, California 90053-2325

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

Re: Crude Oil Terminal at Pier 400, Berth 408
Draft SEIR/DEIS Documents

Dear Dr. MacNeil and Dr. Appy:

Integrated Engineering Management (IEM) enthusiastically supports the Port of Los Angeles' draft Supplemental Environmental Impact Report and draft Supplemental Environmental Impact Statement (DEIR/DEIS) for the Pacific L.A. Marine Terminal LLC Crude Oil Terminal.

This project is an excellent example of meeting the green growth goals established in the Clean Air Action Plan. Some of the benefits offered by this project are:

- Use of low-sulfur fuels for ship main and auxiliary engines
- Coastal Emission Reduction Credits will be provided to South Coast Air Quality Management District to offset emissions
- Storage tanks will employ Best Available Control Technology
- High-capacity pumps and large diameter pipelines ensure maximum offloading rates to shorten time vessels are in port
- Voluntary vessel speed reduction participation
- Electric-powered shore side pumps reduces vessel emissions at the docks
- Use of Alternative Maritime Power (AMP) for vessels at berth

IEM is a small construction and project management firm based in San Pedro, California. We have a total of 15 employees from which 7 live in the harbor area. Over 60% of our business comes from the Ports of Los Angeles and Long Beach. Therefore, our business vitality and

employee health are directly related to the Port's continued development and growth of green facilities. We have been providing services to the Port of Los Angeles since 2001. Since then we have personally witnessed the Port's cultural change to building and operating green and emission-free facilities.

We, along with many others, are in support of green growth at the Ports. And this project is a great example that demonstrates how future growth at the ports can be efficiently managed while mitigating environmental impacts, and it represents an important step to ensure green growth at the Ports. As with any healthy business it is imperative to have continuous improvements and operational enhancements and the Port facilities are no different. Developing a crude oil terminal at Pier 400, Berth 408 brings many benefits to the local residents and business owners.

If the Ports stop their project improvements and growths, soon our company along with a number of other small businesses, who specialize in ports and harbor facilities, will be driven out of business. Please approve this Draft EIR/EIS for Crude Oil Terminal at Pier 400, Berth 408 and allow the Port of Los Angeles to implement their plan for building and operating an efficient and emission-free Crude Oil Terminal Facilities.

Thank you.

Sincerely,
IEM

A handwritten signature in blue ink, appearing to read 'Behjat Zanjani', written over a horizontal line.

Behjat Zanjani, P.E., C.C.M.
President