



Scenic America

Commander, U.S. Army Corps of Engineers, Los Angeles District,
c/o Dr. Ralph Appy
Port of Los Angeles
425 South Palos Verdes St.
San Pedro, California 90731



September 24, 2007

Dear Mr. Appy,

We would like to first thank the Port of Los Angeles and Army Corps of Engineers for the opportunity to provide comments on the Draft Environmental Impact Statement/Environmental Impact Report Berth 97-109 Container Terminal Project. In our review, it appears that the significance of visual impacts as a legitimate, measurable resource impact has been downplayed.

While it is understandable to cite the area's industrial purpose as part of a description of the existing environment, this description must, necessarily, also include and account for the community context of the various neighborhoods surrounding the Port. The visual character of these areas should not be ignored nor the quality of life for these communities sacrificed simply because they lie geographically juxtaposed. Decisions can be implemented that honor the mechanical necessities of Port operations while integrating measures for visual quality improvements. Specifically, there are several issues of concern in how aesthetic, scenic, visual impacts are addressed, such as;

- The analysis inadequately addresses the direct, indirect and cumulative affects of current and proposed lighting in contribution to light pollution in the area.
- The document fails to appropriately define and examine the setting of the project to include the context of the communities bordering the port. It is impossible to separate or ignore the visual impacts associated with these adjacent lands.
- The analysis fails to adequately address the visual impacts of views from within the neighboring communities. Along with travel routes along or past the area, these views should have been considered key observation points by which the visual impacts of alternatives were evaluated and to which subsequent monitoring activities are developed.
- The document fails to recognize numerous opportunities for visual quality improvements through compensatory mitigation where on-site physical techniques are not feasible.
- The analysis is weak in consideration of ancillary structures, utilities, vehicles, signage and other features which contribute to the visual environment and thusly, the cumulative and indirect impacts.

Scenic resources are a public resource which can be inventoried, monitored and protected. We recommend that the Port and other responsible authorities reconsider the attention to visual quality impacts. Doing so could represent a visible opportunity for the Port to demonstrate its commitment to the communities in which it resides.

Sincerely,

Brad Cownover
Director, Scenic Conservation Services