CITY OF RANCHO PALOS VERDES

PLANNING, BUILDING, & CODE ENFORCEMENT

19 September 2007

Commander, U.S. Army Corps of Engineers
Los Angeles District
% Dr. Spencer D. MacNeil
PO Box 532711
Los Angeles, CA 90053-2325

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SEP 21 2007
Env. Mgmt. Div.
Harbor Dept.
City of L.A.

Port of Los Angeles
Dr. Ralph Appy, Director
Environmental Management Division
425 S. Palos Verdes St.
San Pedro, CA 90731

SUBJECT: Comments on Draft EIS/EIR for the Berths 136-147 Container Terminal (TraPac) Project

Dear Drs. MacNeil and Appy:

The City of Rancho Palos Verdes' is in receipt of the Draft EIS/EIR for the above-mentioned project. We appreciation that the Corps and the Port have extended the public comment period for this document in response to significant public concern. Our comments are as follows:

1. With respect to Aesthetics and Visual Resources, many Rancho Palos Verdes neighborhoods on the east side of the City enjoy views of the Vincent Thomas Bridge and Main Channel of the harbor. However, the analysis of aesthetic and visual impacts of the proposed project upon residential neighborhoods overlooking the harbor appears to have extended no farther than approximately one-quarter mile west of the project site. The Rancho Palos Verdes neighborhoods most affected by the visual aspects of the project are primarily located west of Western Avenue along Miraleste Drive, Palos Verdes Drive East and Crest Road, but these neighborhoods almost completely ignored by the draft EIS/EIR. In addition, the draft EIS/EIR concludes that the adverse visual and aesthetic impacts of the proposed project would not be significant, either individually or cumulatively. Although the proposed project involves one (1) less gantry crane than currently exists, the environmental analysis dismisses the use lower-profile cranes as infeasible "due to economic considerations and possible

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safety issues." What are these economic and safety issues? Also, does the analysis of aesthetic and visual impacts include the effects of a multi-colored "sea" of stacked cargo containers on the backland portions of the project site?

2. With respect to Air Quality, it is clear that this project would have both construction-related and operational air quality impacts upon surrounding communities. Our cursory review of the air quality impacts analysis in the draft EIS/EIR suggests that the baseline air quality conditions for this project are based upon a small number of sampling sites, only two (2) of which are located in or adjacent to residential areas. There appears to have been no sampling conducted west of the Harbor Freeway and/or Gaffey Street; the City of Rancho Palos Verdes is located at least a mile west of these thoroughfares. In addition, the draft EIS/EIR concludes that the adverse air quality impacts of the proposed project cannot be mitigated to less-than-significant levels in either the short or long term. Why has the Port's past air quality monitoring been so limited? Why can't the mitigation of air quality impacts be accelerated so as to all be accomplished in the short term (i.e., Phase 1) rather than deferring some of them to the long term (i.e., Phase 2)?

3. With respect to Noise, our cursory review of the impact analysis shows that there has been no consideration of project-related noise west of the Harbor Freeway and/or Gaffey Street. The proposed noise mitigation measures deal with short-term, construction-related impacts and do not reduce these impacts to less-than-significant levels. Furthermore, there appears to be no attempt to analyze, address or mitigate for operational noise impacts. Many Rancho Palos Verdes residents find that sounds from the harbor area are amplified as they move uphill to the west. With the ports of Los Angeles and Long Beach moving increasingly to 24-hour operations, we believe that the long-term operational noise impacts upon our residents may be significant. Why has no noise monitoring been conducted at higher elevations to the west of the project site? What kind of mitigation measures might be imposed to reduce long-term operational noise impacts to surrounding communities?

4. With respect to Ground Transportation, there (again) appears to have been no consideration given to project-related traffic impacts for areas west of the Harbor Freeway and/or Gaffey Street. Although the likelihood of project-related traffic being diverted all the way to Western Avenue—the City's major north/south arterial on the east side—seems remote, it does not seem to us remote that the cumulative effects of this project's construction and operational traffic with the large number of new residential units proposed in the San Pedro area would be insignificant. For example, the list of cumulative traffic generators does not

include the proposed 1,950-unit *Ponte Vista* condominium project and the Los Angeles Unified School District's proposed 810-seat high school on Western Avenue at the former Navy housing site, nor does it include many other mixed-use and residential developments in northwest and central San Pedro. The analysis of the cumulative ground transportation impacts of the project is woefully inadequate.

Again, thank you for the opportunity to comment on this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5228 or via e-mail at *kitf@rpv.com*.

Sincerely,

Kit Fox, AICP
Associate Planner

cc: Mayor Long and City Council
Carolyn Lehr, City Manager
Carol Lynch, City Attorney
Joel Rojas, Director of Planning, Building and Code Enforcement