



Olivia Cueva-Fernández
1657 Marine Avenue
Wilmington, CA 90744

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Dr. Ralph G. Appy, Director
Los Angeles Harbor Department
Environmental Management Division
425 S. Palos Verdes Street
San Pedro, CA 90731

Commander
U. S. Army Corps of Engineers
Los Angeles District
P. O. Box 532711
Los Angeles, CA 90053-2325

Subject: Draft EIS and EIR for Berths 136-147 Container Terminal

Dear Sirs:

I'm responding to the document with a sense of bewilderment. I have focused on transportation because of its direct effect on Wilmington students, the community, and me. Yet, there are other areas of concern, some of which I will discuss. As a lifetime resident of Wilmington, one of the founders of Wilmington HomeOwners, and as an education member-at-large on the Port Community Advisory Committee, I feel that important elements are lacking in the conclusions and impacts that the proposed project will have upon Wilmington inasmuch as existing conditions already have negative ramifications.

It is my understanding that the project's primary goal is to facilitate and increase the capacity of moving goods in and out of the port to customers throughout the region/country. However, the project's impact is NOT confined to conditions on port land since it significantly effects the quality of life, health, and safety of Wilmington residents and their children. Therefore, a major flaw of the report is that it does not address off-port impacts and it should do so. Why? Because the City of Los Angeles and the Port of Los Angeles have the responsibility to protect its citizens and it can do so. It can improve the efficiency of the container terminal, increase revenue and throughput, and acknowledge that the environmental effects of this project extend beyond "B" Street (Harry Bridges Blvd.). The public, that is, the Wilmington public, already knows and feels the effects of port business and has practical understanding that port growth will increase the negative impact upon the community. It is extremely necessary and important to mitigate to the fullest the severity of future expansion.

Transportation

The Introduction (3.10.1) states that the transportation analysis includes streets and intersections that would be used by truck and automobile traffic to gain access to and from the container terminal. It does not accurately describe Figueroa Street, which is residential on its eastside, nor does it even mention Pacific Coast Highway. It also implies that construction traffic (i.e., equipment and commuting workers) would use other streets and not these roadways to merit consideration. That is not an accurate statement/assumption.

Figueroa will become more of a nightmare similar to Eubank Avenue, north of PCH. Truck traffic should be prohibited on Figueroa except for emergency situations. Pacific Coast Highway now serves as an alternate route for trucks traveling east/west. This highway and its Figueroa/I 110 connections were completely omitted from the analysis charts.

If the existing area traffic conditions (3.10.2.2) were conducted in August 2002, then a more recent and accurate assessment is needed. If conditions were factored to 2003, it is now 4 years later. What is the true picture, especially with the implementation of 24/7?

Los Angeles and other cities have set precedence in prohibiting trucks on certain roads. I strongly believe that this should be done on Pacific Coast Highway. The Meyers, Mohaddes study (2003) shows LOS "F" at locations along PCH.

As an educator, let's consider estimates on student use of PCH, as pedestrians, passengers, or drivers. The attendance boundary areas of the following schools demonstrate the need for students to cross PCH: Wilmington Park, Fries Ave., Gulf Ave., Wilmington Middle, and Phineas Banning High. In addition four private schools, Harbor College, day care and children centers, community adult and continuation schools must cross the highway twice a day. By using enrollment totals for four elementary schools, one middle and one high school, it can be estimated that at least 1/3 of the students cross PCH twice a day. That means 6226 crossings per day, half at morning peak hours. Although two pedestrian signaled crosswalks were installed this year and crossing guards are used at other signaled intersections, dangerous conditions still exist with carelessness, diesel emissions and trucks traveling at high speeds. Many truck drivers avoid the suggested Harry Bridges truck route, preferring to use Pacific Coast Highway to access Alameda Street, and/or the Terminal Island or Long Beach freeways. I have followed them observing this repeated behavior.

With the increase of trucks, equipment and auto traffic needed for the project, it should be of the highest priority to prohibit truck traffic on PCH. Another factor is that now, at all hours, residents must hear, breathe, smell and dodge trucks. To get a good night's sleep or to do errands without the nuisance of port related trucks is impossible.

The existing transit service of bus lines 445, 446, and 447 would probably need to be re-routed, passengers would not have convenient access to bus stops, or would have to wait for bus service at dangerous stops along busy Harry Bridges Blvd. It's interesting that line 202 and the Commuter Express are mentioned although they do not travel through the project area. (3.10.2.3)

The proposed project transportation improvements (3.10.3.1.5) fail to mention any transportation projects at either Anaheim or PCH at Figueroa/Harbor freeway. These two locations are considered out of the jurisdiction of the project, but upgrades are needed now and the need will only worsen. These are very dangerous locations.

The Harry Bridges buffer area (3.10.3.1.6) states that the analysis indicates no circulation related problems or impacts associated with street closures. However, local vehicular traffic will be unable to travel east/west parallel to Harry Bridges. Security, safety, and evacuation measures may indicate the need to re-consider the lack of an alternate exit route for the neighborhood and buffer users.

In addition, moving the rail yard to the Consolidated berth area would heavily impact the marinas. What are the mitigation measures to assure the safety and health of marina residents and visitors? Has a "quiet zone" been considered for their peace and quiet? Will people, cars, or emergency vehicles have appropriate alternate escape routes?

Buffer Area

In the 80's when the Los Angeles Harbor Department Executive Director attended a Wilmington HomeOwners meeting, the idea of a 15-foot wall was mentioned. It was reportedly necessary to block port noises. As the idea became more fact, the Wilmington community adamantly opposed its construction. At meetings, by letters and petitions, residents voiced their opposition to the wall. Port officials listened and the wall was put on hold. What was never answered or addressed, either then or now, was evidence that an official government agency recommended such a wall project to mitigate noise or air quality. At that time the wall was to be built along "C" Street, now it's on "B" Street with a grassy landscape to its north.

However, in my opinion, it is still a wall and no proof has been shown to prove its validity. I fully support the green buffer concept, but if someone sits on the grass what will be visible of the port? What proof is there that the air quality and noise will not effect the Wilmington community, especially nearby residents and visitors to the location. Where will the dirt come from? How will the harbor be viewed and enjoyed?

It will only be viewed from on top of a manmade barrier. How will the bicycle path or seating areas be protected from diesel pollution? How will the trolley be seen? Viewers will only see the overhead wires. What other port in the world has used a buffer such as this? What happens when all the air is clean and the citizenry wants to look at the activity of the port? Will the buffer mound be removed? Would such a buffer be proposed along Harbor Blvd. in San Pedro? No, in fact, conditions are made to better enjoy the view.

Viewing the port and its activity can be both a learning and aesthetic experience, so why can't Wilmington have the buffer without the raised camouflaged wall? As defined in the dictionary, camouflage is the method or result of concealing people or things by making them appear to be part of the natural surroundings. I find that a limited number of illustrations show the true perspective of the southern edge of the buffer. It is probable that many people are so enthralled with the prospect of green space that the effect of the wall is overlooked. Other than the height barrier, this buffer is an excellent mitigation project to be adjacent to a residential zone and a busy thoroughfare.

Further, two nearby elementary schools, an adult skills center, a school of oceanography, residents and businesses will benefit from the advantages of the green space providing cleaner air and noise abatement. Modern technology and materials used in walls, windows, and design will enable new and existing homes and buildings to further benefit from a better and healthier environment. For example, Lennox District school buildings near LAX are insulated and designed to eliminate noise from overhead airplanes. The buffer can be beautiful with trees, water features, social amenities, lightning as currently proposed without the upright barrier.

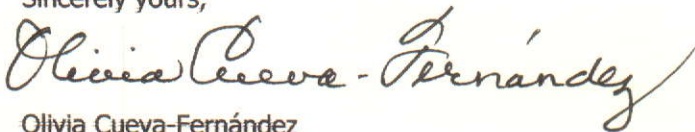
In conclusion, I have assessed the proposed container terminal project at berths 136-147 from the vista of a local resident. I believe every effort should be made by the Port and the City of Los Angeles to safeguard the health, safety, and welfare of the children and adults. It can be proven that environmental factors both on and off port land can be changed to provide the best scenario for business and community. Other ports can learn by example and can expand their capacities. Not only goods but also dollars go through the Wilmington area. Let some of it stay to improve our quality of life. Our children deserve to live and learn in a clean and safe environment.

The proposed project and its five alternatives all have negative transportation impacts.

I appreciate and thank you for accepting PCAC's recommendation of an extension time for the comment period. Reading and understanding the draft was a time consuming task interspersed with daily living. Although the CD disk was helpful, reading the library's hard copy was more friendly but difficult to handle. I suggest that future EIR and EIS hard copy volumes be placed into smaller or more binders. It was very tedious turning pages and then struggling to re-close binder rings.

It is my hope that serious consideration will be given to my comments, directly related or not.

Sincerely yours,

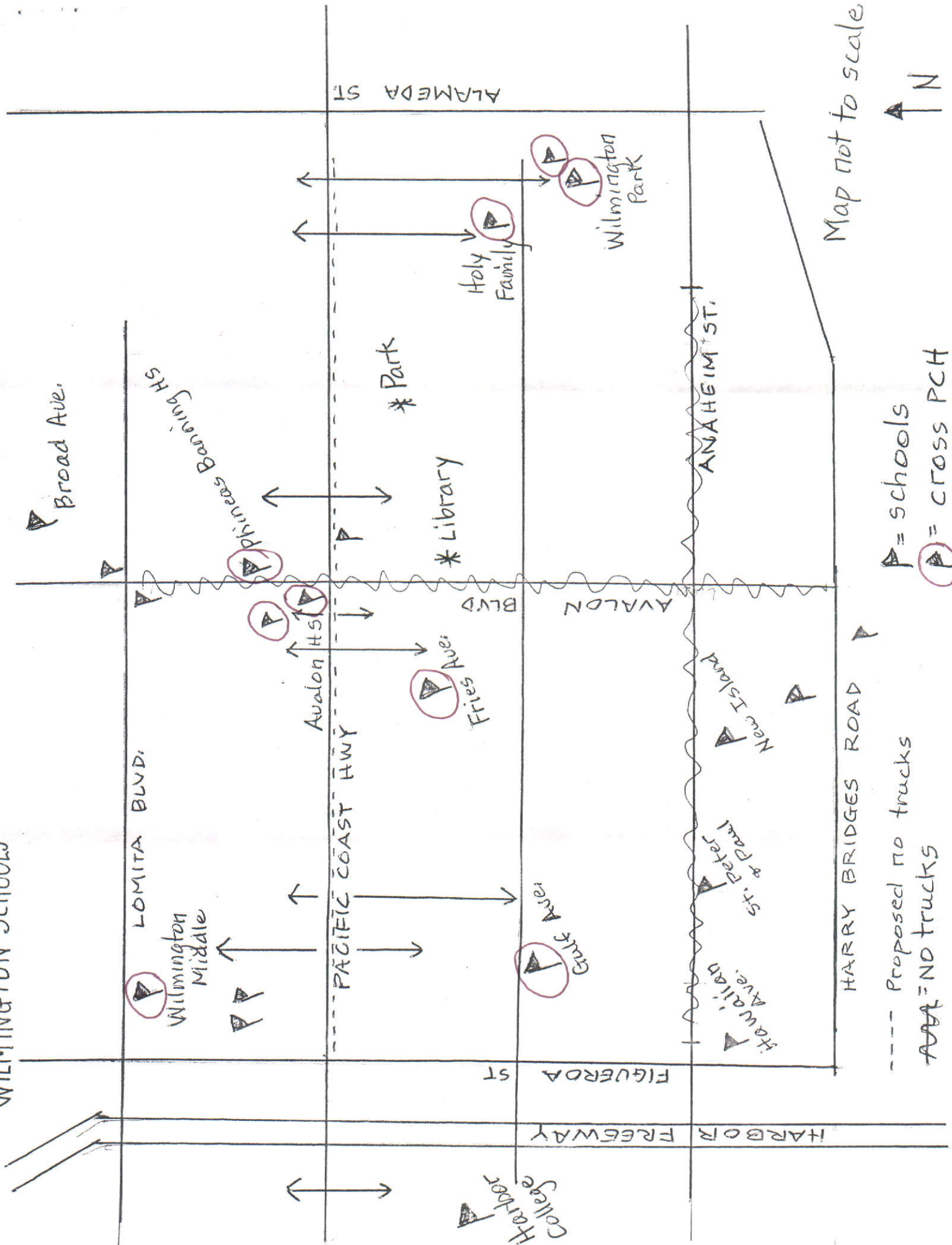


Olivia Cueva-Fernández

Enclosures (2)

CC: Richard Vladovic, LAUSD, Board of Education, District 7
Linda Del Cueto, Superintendent, Local District 8
Linda Spink, President, Los Angeles Harbor College
Wilmington Neighborhood Council, Transportation Committee
Wilmington HomeOwners

WILMINGTON SCHOOLS



Map not to scale



▲ = schools
▲ (circled) = CROSS PCH

--- Proposed no trucks
AAA = NO TRUCKS

My Visual Perception

