



PLANNING, BUILDING, & CODE ENFORCEMENT

23 July 2008

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

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

SUBJECT: Comments on Draft Supplemental Environmental Impact Statement/Supplemental Environmental (SEIS/SEIR) Impact Report for the Pier 400, Berth 408 (Pacific L.A. Marine Terminal) Project

Dear Drs. MacNeil and Appy:

The City of Rancho Palos Verdes is in receipt of the Notice of Availability for the above-mentioned project. The following are our comments on the Draft SEIS/SEIR:

1. With respect to Air Quality, the increasing development within the Port of Los Angeles over the past few years has lead to deteriorating air quality for our residents, especially those who reside in the neighborhoods along Western Avenue. The City of Rancho Palos Verdes is concerned that the introduction of a crude oil transfer facility to the Port will exacerbate these adverse air quality impacts. Has the Port considered alternative locations for such a facility that would be located further from the most populated areas near the Port (perhaps even an off-shore facility)? We encourage the Port to explore all feasible options before introducing this new use to Pier 400.
2. With respect to Hazards and Hazardous Materials, the City of Rancho Palos Verdes is concerned that the new transfer facility and network of distribution pipelines place the general public at risk in the event of an accidental (or intentional) explosion. Such a catastrophic event would have dire effects upon nearby neighborhoods. Again, has the Port considered alternative locations for this facility that would be located further from populated areas?
3. As you may be aware, the Los Angeles County Sanitation Districts are considering a project to construct a new joint outfall pipeline (i.e., the "Clearwater Program"). The Sanitation Districts' existing outfall pipelines run under residential neighborhoods on the east side of our City, and the Sanitation Districts own property in Rancho Palos Verdes (currently leased to the City for use as Eastview Park) that includes access shafts for these pipelines. Among the alternatives for the construction of the new joint outfall pipelines would be the use of the Eastview Park property as a staging

area for tunneling operations, a lengthy and disruptive process that would adversely affect the quality of life for nearby residents in Rancho Palos Verdes and San Pedro. However, an alternative pipeline alignment that is under consideration would place the staging area for the tunneling operations at the site of the former LAXT facility on Terminal Island (i.e., "Potential Shaft Site No. 6"). The City of Rancho Palos Verdes is supportive of this alternative because it would place the most disruptive surface elements of the construction process as far as possible from surrounding residents. However, we note that the Pacific L.A. Marine Terminal project currently proposes a tank farm on the former LAXT site. The City encourages the Port to consider project alternatives that either relocate the proposed tank farm or modify it in such a manner as not to foreclose the possible future use of a portion of the former LAXT site for the Sanitation Districts' Clearwater Program. Additional information about the Clearwater Program is available at <http://www.clearwaterprogram.org/clearwater/>.

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 kittf@rpv.com.

Sincerely,



Kit Fox, AICP
Associate Planner

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