Attachment C

From: Appy, Ralph
To: Maun-DeSantis, Lena; Sidley, Janna; Prickett, Katherine;
cc: Christensen, Mike;
Subject: FW: Initial EPA comments regarding the POLA Channel Deepening FSEIS alternatives
Date: Thursday, April 16, 2009 1:36:33 PM

Just received the attached e-mail from U.S. EPA

R.

From: Ross.Brian@epamail.epa.gov [mailto:Ross.Brian@epamail.epa.gov]
Sent: Thursday, April 16, 2009 12:25 PM
To: Appy, Ralph
Cc: Jyotsna.I.Jaiswal@usace.army.mil; Amato.Paul@epamail.epa.gov
Subject: Initial EPA comments regarding the POLA Channel Deepening FSEIS alternatives

Dear Dr. Appy,

EPA has received the Final Supplemental EIS for the Port of Los Angeles Channel Deepening Project. We are in the process of preparing our official agency comment letter, due May 17, 2009.

From a dredging and sediment management standpoint, completion of the FSIES will be an important milestone. EPA has been actively and intensively involved in coordinating on the Channel Deepening project for several years. Identification of placement options for the project's remaining 2.5-3 million cubic yards of dredged material, that are both environmentally acceptable and consistent with the beneficial reuse goals of the LA Contaminated Sediment Task Force (LA-CSTF) Long Term Management Plan, has been a long time coming.

EPA especially appreciates the Port's willingness to work closely with us to minimize ocean disposal of clean material that could otherwise be beneficially reused, and to incorporate the ability to responsibly manage contaminated material in "Port development" features of the project. Long term capacity for the removal and containment of contaminated sediments from various areas within the Port is in critically short supply, and the ability to generally improve sediment and water quality throughout the Port as a whole can be limited, in part, by this shortfall. That is why EPA has strongly encouraged, and will continue to strongly encourage, the incorporation of contaminated sediments into otherwise approved, and properly engineered, Port fill projects. Therefore we support the Port's approach in Alternative 1 ("Port Development and Environmental Enhancement") of engineering the proposed Berth 243-245 fill to also serve as a Confined Aquatic Disposal (CAD) site. If this site is ultimately approved to be filled for redevelopment, it could provide capacity for safely managing contaminated sediments from not only the Channel Deepening project, but potentially from other areas needing cleanup as well. This is in addition to the benefit of capping the contaminated sediments that are already present in these berths. Alternative 2 ("Environmental Enhancement and Ocean Disposal") creates

no such capacity, or benefit. Alternative 1 is also more consistent with the LA-CSTF Management Plan, because it would result in less dredged material being disposed as a waste in the ocean and more material being beneficially reused than would Alternative 2. For these reasons we agree that, overall, Alternative 1 (the Recommended Alternative in the FSEIS) is the environmentally superior alternative.

We look forward to continuing to work closely with you and your staff on this project. If there are any questions about these initial comments, please give me a call. Once again, please note that this email does not serve as EPA's formal comments on the Channel Deepening Project FSEIS, which will follow from our Environmental Review Office under formal EPA letterhead.

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