

17 June 2008

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Port of Los Angeles  
Environmental Management Division  
% Dr. Ralph Appy, Director  
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San Pedro, CA 90731

**SUBJECT: Comments on Re-Circulated Draft EIS/EIR for the Berths 97-109 Container Terminal (China Shipping) Project**

Dear Drs. MacNeil and Appy:

The following are the City of Rancho Palos Verdes' comments on the Re-Circulated Draft EIS/EIR for the above-mentioned project. We previously commented on the project in correspondence dated 3 October 2006.

1. With respect to Aesthetics and Visual Resources (Section 3.1), the City appreciates that, as we had previously requested, a photograph representing a "typical" harbor view from Rancho Palos Verdes was taken in the vicinity of Clevis Road and Palos Verdes Drive East for inclusion in the Re-Circulated DEIS/EIR. However, we note that more extensive "before-and-after" view simulations in the document are still limited to a handful of sites nearer to the proposed project and located mostly east of the Harbor Freeway and Gaffey Street. Why were similar simulations not provided for all of the sites from which photographs were taken?
2. With respect to Air Quality (Section 3.2), it is clear that this project would have both construction-related and operational air quality impacts upon surrounding communities. As we noted in our previous comments of 3 October 2006, 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 still 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. Figure 3.2-10 appears to depict an increase in annual particulate matter (i.e.,  $PM_{10}$ ) concentration in the extreme easterly portion of the City (i.e.,  $0.1 \mu\text{g}/\text{m}^3$ ) that is directly attributable to the proposed project. What are the likely human health effects of such a change upon the residents of our City? Has a corresponding analysis of annual  $PM_{2.5}$  concentration been conducted? If so, what human health effects does it identify for our residents?



3. With respect to Ground Transportation (Section 3.6), as we noted in our previous comments of 3 October 2006, there appears to have been no consideration of project-related traffic west of the Harbor Freeway and/or Gaffey Street. Although the likelihood of project-related traffic being diverted all the way to Western Avenue—our 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 (Table 3.6-2) does not include the proposed 1,950-unit *Ponte Vista* project on Western Avenue at the former Navy housing site, nor does it include the numerous other mixed-use and residential developments in northwest and central San Pedro. We continue to believe that the analysis of the cumulative ground transportation impacts of the project is inadequate.
  
4. With respect to Noise (Section 3.11), there (again) appears to have been no consideration given to project-related noise impacts for areas west of the Harbor Freeway and/or Gaffey Street. Most of the proposed noise mitigation measures deal with short-term, construction-related impacts and none reduces these impacts to less-than-significant levels. 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?

Thank you for the opportunity to comment again 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](mailto: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

