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U.S. Army Corps of Engineers, Los Angeles District
Regulatory Division
c/O: Spencer D. McNeil, D. Env.
ATTN: CESPL-CO-R-2003-01029-AOA
P.O. Box 532711
Los Angeles, CA 90053-2325

Ralph Appy
Director of Environmental Management
Port of Los Angeles
425 S. Palos Verdes Street
P.O. Box 151
San Pedro, CA 90731-015

**Subject: Draft Supplemental Environmental Impact
Statement/Subsequent Environmental Impact Report
(SEIS/SEIR) For the Pacific L.A. Marine Terminal LLC Crude Oil
Terminal Project**

Mr. MacNeil and Drs. Appy and MacNeil,

We the elected Board of the Northwest San Pedro Neighborhood Council provided the comments below to the Pacific L.A. Marine Terminal LLC Crude Oil Terminal Project. Given the proximity of Northwest San Pedro to the existing bulk storage in the West Basin and on Mormon Island (East Basin) we have developed the attached comments for your incorporation into the final SEIS/SEIR to be considered by the Board of Harbor Commissioners. All of the comments below are related to the proposed project.

General Comments

1. There are significant unmitigated air quality, noise, biological resources, and recreation impacts from the proposed project. Additional mitigation is both necessary and reasonable for these unmitigated impacts.
2. Aesthetics is considered a less than significant impact and there are no mitigations proposed. Given the addition of a crude oil terminal at Pier 400 directly opposite Cabrillo Beach, we believe some aesthetic mitigation is required and can be provided. A potential mitigation to the loss of aesthetics and for the other unmitigated impacts could be improving the water quality flowing into the West Basin from Peck Park and other water sheds in San Pedro.
3. All aspects of the project should meet and exceed the requirements of the San Pedro Bay Clean Air Action Plan, and No Net Increase Policy adopted by the Board of Harbor Commissioners.

4. During implementation of the project construction and operation the Port needs to evaluate air quality, noise, and recreation impacts to test the modeling and basis for the mitigations proposed. Should actual air quality and recreation impacts be greater than estimated in the SEIS/SEIR then the Port should propose additional mitigations to reduce the impacts to acceptable levels.
5. Every five years during terminal operations verification of throughput projections stated in the Final SEIS/SEIR should be performed. Should these projections be exceeded then additional air quality and other mitigations should be required.
6. Biological Impact 4.2c is considered significant with mitigation not available beyond regulatory compliance or none feasible for invasive species. We find this to be unacceptable and request that the Port and COE include specific language within the lease agreement for the treatment and management of ship water to reduce and/or eliminate the potential for invasive non-native species to be released into San Pedro Bay Waters.
7. We propose that a project objective of the new crude oil terminal be the overall reduction in overall particulate emissions from crude oil transport via ship calls to the Port of Los Angeles.
8. The lease agreement between the Port of Los Angeles and Pacific Energy Partners should include a provision that all ships be AMP ready, or equivalent, and have the ability to operate auxiliary engines on low sulfur diesel.
 - a. The operation of the facility should lead to a reduction and eventually the elimination of crude oil tanker calls and terminals within the inner harbor.
9. When Plains All American applies for emissions credits from the South Coast Air Quality Management District, the credits should be required to offset emission from sources in the San Pedro Bay Area.
- 11. Environmental Impact AQ-1, AQ-2: Construction and operations would produce emissions that exceed South Coast Air Quality Management District (SCAQMD) emission significance thresholds.**

The amount of emissions from construction and operation of the proposed project is unacceptable. The Port should explore additional opportunities to lower the pollutant emissions.

During construction and operation of the proposed project, there will be significant unmitigated emissions of VOCs, CO, NO_x, Sox and PM₁₀ and PM_{2.5}. More specific air quality mitigations to control construction

emissions need to be included as part of the DEIR/DEIS and in future construction specifications. Specifically, all construction equipment should:

- 100% Use low sulfur diesel fuel
- Limit idling times to 5 minutes for all equipment and trucks
- Use diesel particulate filters on all equipment
- Use of electrical or natural gas equipment on-site where feasible.

In addition, we would expect that specific construction mitigations would be included on all Port projects to achieve no net increase in emissions.

12. Environmental Impact AQ-3: The proposed project and the project alternatives will result in operational emissions that exceed 10 tons per year of VOCs and SCAQMD thresholds of significance.

According to the analysis in the DEIR/DEIS analysis the project will have significant impacts from VOCs, CO, NO_x, PM₁₀, and PM_{2.5} through the project lease even with mitigations. We understand that technical challenges exist in reducing air quality impacts, however proposing a project that never over a 30 year time frame does not completely mitigate air quality impacts is a concern. Should mitigations not be available on this project we ask the Port to evaluate mitigation measures that could be applied to reduce emissions at other locations to further reduce the emissions from the terminal to below CEQA Thresholds.

13. There should be periodic review and application of new technology and regulations.

As part the project construction and operation the Port needs to include a post-project validation system that implements new technologies to reduce air quality impacts as soon as possible and take advantage of advances in air pollution control technologies. In addition, a formal review should be done every year to evaluate the state of the emissions control industry and how new technologies and devices could be applied to Port projects.

We look forward to release of the Final SEIS/SEIR with incorporation of our comments and recommendations as we work to develop a terminal project with the least impacts to the NWSP and Port community.



for

Dan Dixon
President
Northwest San Pedro Neighborhood Council