



# Wilmington Neighborhood Council

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July 23, 2008

U.S. Army Corps of Engineers, Los Angeles District  
Regulatory Division  
c/o Spencer D. MacNeil D.Env.  
Attn: CESPL-RG-2004-00917-SDM  
P.O. Box 532711  
Los Angeles, CA 90053-2325

Dr. Ralph Appy, Director Environmental Management Division  
425 S. Palos Verdes St.  
San Pedro, CA 90731

Re: Pacific L.A. Marine Terminal LLC Crude Oil Terminal Project SEIS/SEIR

Gentlemen:

The Wilmington Neighborhood Council has reviewed the Crude Oil Terminal environmental document and supports the proposed project for the following reasons:

California's economy is and will be dependent on imported oil for the foreseeable future yet lacks the infrastructure needed to meet the demand. The facility will have the capacity to accommodate over 25% of the southern California crude oil demand.

Due to limited refining capacity, the state must import ten percent of its refined blending components, gasoline and diesel. The project will increase capacity enabling refineries to produce more finished gasoline and diesel.

With the No Project and Reduced Project Alternatives future demand could exceed the storage capacity of existing marine terminals resulting in the increased use of trucks and rail cars to transport refined products to southern California.

The project will not contribute to road congestion because all product will be transported by pipeline to local refinery facilities.

The facility will incorporate Best Available Control Technologies that substantially reduce vapors and the risk of spills and Clean Air Action Plan emissions reduction measures. The applicant also proposes voluntary measures that exceed regulatory compliance such as the use of low sulfur content fuel in ships' boilers while at berth and a support structure for the Advanced Maritime Emissions Control System (AMECS) or 'sock' technology to reduce smokestack emissions.

The community appreciates the fact that the project applicant has made an exceptional effort to explain every aspect of this facility and to address community concerns.



Considerations:

Temporary or partial road closures due to pipeline trenching, underground boring or boring shafts in the vicinity of Banning's Landing and Avalon Triangle Park could potentially disrupt Wilmington waterfront redevelopment in this vicinity.

Land Use -- The underground pipeline will cross an approx 3000-foot long x 200-foot-wide strip of land between the WWL auto terminal and Leeward Bay Marina that is zoned industrial, however the community is proposing future marina, recreational and public access use of this area. Please consider this potential long-term community land use when siting any above ground monitoring stations or utility connections.

General Comments:

Water Quality and Sediments - The Draft SEIS/SEIR states, 'TMDLs will be developed that will specify load allocations from the individual input sources, such that the cumulative loadings to the Harbor would be below levels expected to adversely affect water quality and beneficial uses of the water body. However, these TMDL studies are not planned until the year 2019. Thus, in the absence of restricted load allocations and/or removal or remediation of contaminated sediments, the impairments would be expected to persist.'

Although TMDLs have not been established the Port has initiated a Water Resource Action Plan that could be completed earlier than 2019.

The WNC recommends:

All new terminal projects or expansions should anticipate greater water pollution control measures and that terminal construction and storm water collection basins be designed to avoid costly future reconstruction.

Evaluation of shipboard ballast water treatment systems for all commercial vessels

Any hull cleaning or maintenance performed on commercial vessels while at berth should include the capture and proper disposal of debris.

Thank you for the opportunity to comment on the Pier 400 Crude Oil Terminal Project.

Sincerely,



Cecilia Moreno  
Chair  
Wilmington Neighborhood Council

Cc: file