

San Pedro and Peninsula Homeowner's Coalition

Member Associations

*Averill Park - Casa Verde Estates - Leland Park - Palisades
Palos Verdes Shores - Peck Park/Holy Trinity - Pt. Fermin - Rolling Hills Riviera
San Pedro Homeowners United - South Shores - Vista Del Oro - Westmont No.4*

September 26, 2007

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

Dr. Ralph G. Appy, Director of Environmental Management
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731
ceqacomment@portla.org

Re: Berths 136-147 [TraPac] Container Terminal Project (Corps File Number 2003-01142-SDM)

Dear Dr. MacNeil and Dr. Appy:

The San Pedro & Peninsula Homeowner's Coalition has spent its most intensive study on the "Aesthetics" component of the Tra Pac Project EIR. While we have reviewed the entire document, we have well understood that there are many qualified organizations specialized in the areas of air quality, water quality, traffic analysis etc. who are commenting on those aspects. We appreciate, respect and endorse all of their comments. Our Coalition has signed onto their respective letters in total approval.

In this letter of comment, we (the Coalition) have focused primarily on the issue that we believe may fall below the radar screens of those not immediately "facing" the aesthetic situation as our residents are.

1) Aesthetic Findings of the Tra Pac EIR

We find the overall analysis of Aesthetics is deficient and Baseline Unacceptable

The baseline for aesthetic comparison uses a beginning date of December 2003. Conveniently, that is after the placement of a number of the Terminal's largest gantry cranes implemented through the Coastal Permitting Authority of the Port, and not subject to any public environmental review process. These particular cranes are the very worst obstructers of views of the Vincent Thomas Bridge. Wonderful Views of that bridge were once enjoyed from the most traveled corridor into the Community, the 110 Frwy. Assessing the Terminal's growth and its impacts without consideration of those cranes and their effect on the environment makes this entire Aesthetics Review a cruel ruse. The

baseline is totally unacceptable to our Community, and needs to incorporate a baseline **prior** to implementation of any terminal equipment and/or growth actions that have not been subject to formal public environmental review. Only then can true aesthetic impacts from this terminal's growth be properly evaluated.

- 2) There is continual minimization of the 110 Fwy as not being designated as (pg 3.1-7) a "scenic route or highway", and a discounting of it's significance since the proposed project is "not proximate to attractions". Both of these statements are seen as "false" to our membership.

The 110 Fwy, with, or without, designation IS, in fact, a scenic route and is the ONLY route which is taken by tourists and residents alike traveling any real distance to and from San Pedro and Wilmington. It is the official "entryway" into San Pedro and suffers greatly from industrial blight created over time by unfettered Terminal industrial growth.

On particular days, thousands of tourists drive this route to the cruise terminal which is less than 1/2 mile from the Tra Pac site. To say that Tra Pac is not "proximate" is incorrect at best. The route is also traveled by those tourists visiting the Maritime Museum, Muller House, and various Ports O'Call sites.

The 110 Fwy entryway is also now on the tourist route for the famous Trump Golf Course. Mr. Trump, himself, has also commented on the negative impression for those traversing this route. Unfortunately for him, there is no other route that makes sense to travel.

- 4) We again find the minimization of one of the most significant features and landmarks in our Community, The Vincent Thomas Bridge.

Noting repeatedly that this Bridge has not been declared a "historic landmark", the analysis downplays the significance of the obstruction of views of the Bridge. It also points out that the addition of new cranes at this Terminal will do little to further destroy remaining views since so much damage (done by Tra Pac's earlier crane replacements) has already transpired. Another glaring example of the disingenuous intent of aesthetic analysis by ignoring implementation of these earlier cranes.

- 5) Views from both the Shields Drive and Via Cordova neighborhoods are seen by us as "highly sensitive". Although yet again minimized (pg 3.1-44) by indicating that most homes are not facing the project site, these vistas and views of the little remaining blue water have been appreciated daily by neighbors throughout the course of a day. For many, it has been the **only** reminder that they live in a coastal community.

6) The Lighting aspects of this terminal expansion are deficient as well.

Considering that the Ports of Los Angeles and Long Beach have already been identified by the Dark Skies Association as “one of the brightest spots on the planet” as seen from space, the addition of even more lights without removing others is a given problem. It continues to add to the issue of light pollution and glare already being experienced. Current studies are also connecting increased night light with reduced production of melatonin and it’s connection to cancer.

Also, the increased rail activity on this terminal will also produce more light being generated by trains.

7) SILHOUETTE REQUIREMENT

It is a common practice in a number of coastal communities to “silhouette” a project site so that the public better understands the magnitude of it. It is our recommendation that the Port begin the practice of doing this. The addition of larger ships, gantry cranes, buildings, etc. in this expansion plan cannot fully be understood until the scale of it is witnessed by the public for comment. This practice should be begin immediately.

NO MITIGATION OFFERED TO OFFSET AESTHETIC BLIGHT

As witnessed yet again, the aesthetic thefts are continuing to be ignored by the Port in it’s unbridled expansion plans.

The communities of both San Pedro and Wilmington have surrendered much of the integrity of their communities because of the port. We will no longer remain silent.

The comments of “Scenic America” are well taken in their response to the Tra Pac EIR.

“While it is understandable to cite the area’s industrial purpose as part of a description of the existing environment, this description must, necessarily, also include and account for the community context of the various neighborhoods surrounding the Port. The visual character of these areas should not be ignored nor the quality of life for these communities sacrificed simply because they lie geographically juxtaposed.”

The most simple of considerations and concessions to offset visual blight, such as moving to underground lines, creation of more soft green areas, attempts to minimize obstruction of landmarks, offsetting damage by enhancing other areas of the community, finding ways to reduce light emissions, aggressively

researching ways to reduce crane impacts with alternatives types, etc., have been stonewalled by a unbridled ambition to “grow” the industrial footprint. There most certainly are ways to assist the Community in their attempts to preserve aesthetic qualities. We are not witnessing any attempt to do that in this Aesthetic Environmental Review. It is simply another illustration of the Port taking more away with one hand and offering an obscene gesture to the Community with the other. That will no longer be tolerated.

Sincerely,

Andrew Mardesich
President