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December 11, 2023

Ms Lisa Wunder
Interim Director
Environmental Division
Port of Los Angeles

Via ceqacomment@portla.org

Dear Ms. Wunder,

Thank you for the opportunity to comment on the NOP for the Gibson Blvd. container truck parking lot.

The Notice of Preparation [NOP] determined that an EIR is required for this project and identified 11 areas where there may be significant negative environmental impacts.

The project site is 18.63 acres, just northerly of the police station and the business adjacent to it, between Gibson Blvd. and the 110 Freeway. They propose a parking lot on about nine acres of the site, by grading and paving, constructing several 30' tall retaining walls and adding about 3,300 cubic yards of fill. There will be 393 parking stalls for containers on truck chassis. The lot will be used for staging trips to and from nearby terminals. They assert there will be no container storage on the lot but cite no control mechanisms to assure that is the case. It will operate 24/7, with two employees on site.

All ingress and egress to the site will be by right turn to and from from Gibson Boulevard. They predict 1794 truck trips per day. **This is four times the number originally proposed when this project was presented two years ago as a mitigated negative declaration.**

The first step in preparing an NOP is an "initial study", where the Port tries to identify areas where there may be a significant negative environmental impact. The study identified eleven such areas, including aesthetics, biological resources, geology and soils, noise, cultural resources, greenhouse gas emissions, land-use and planning, transportation, air quality, energy, hazardous and hazardous materials.

The discussion of each of these seems fairly straight forward, with the exception of transportation, truck movements during operations.

Traffic impacts are analyzed in terms of "vehicle miles traveled" [VMT] or "level of service" [LOS] which looks at what crowding results at affected intersections. The problem is that the NOP believes that they are required to evaluate car traffic impacts only, not trucks.

The project that was before us last year was for 466 truck per day. The average length of a truck and semi-trailer is 72'. Placed end to end, those trucks would stretch a little over six miles. [466 x 72' = 33,552' = 6.35 miles. This new NOP says it will have 1,794 one-way truck trips per day. That's four times the traffic estimated two years ago.

By not evaluating truck traffic, we will not learn the answers to some of ur earlier questions, which were:

- Will trucks be backed up on Gibson Blvd. southbound waiting to get into the parking lot? How long will that line be? How much will they interfere with traffic on Gibson? Harry Bridges? On Figueroa?
- If a truck leaving the lot needs to go to a terminal on Terminal Island, how will it get there? South to Channel, then south on Gaffey, and then left onto the 47 freeway? Or south to the Harbor Blvd. onramp to the 47 Freeway?
- If a truck leaving the lot needs to access a terminal from Bridges Blvd, how will they get there? Since it will be right turn only, will they proceed south to Channel Street and try to make a U turn?
- What traffic light improvements will be necessary to accommodate this project? Will a traffic light be required at the entrance/exit to the lot because of the frequency and wide turning radius of the trucks? Note that LADOT permit approval is required and has not been issued.
- What impact, if any, will there be on visitor or police emergency access into and out of the Yang Ming offices and the police station just south of the parking lot?
- What wear and tear impact will there be on the streets near the project, specifically on Gibson Blvd.?

Typically, where significant negative environmental impacts are found, the agency proposes mitigation to lessen the impacts.

In our earlier comments, we proposed two; street paving and under grounding utilities. As we said in our early comment letter, paraphrased:

This developer has access onto Gibson Boulevard only because the Port sold a strip of land along the west side of the Boulevard to them, in about 2017. Prior to that sale, the parcel was completely landlocked. When the Port sold it, it knew or should have known, that development of the parcel would create impacts on the streets, utilities, and rail usage. We therefore believe the following mitigations should be included in any project approval.

Repave Gibson Blvd. The Port has regularly constructed terminals to accommodate high wheel loads, usually 60,000 pounds or more. While the Port has constructed a few roads, such as Bridges Blvd., to withstand such loads, but typically, trucks in the Port must travel on 35,000 pound wheel load streets. This has severe impacts on the roads. Imagine the condition of Gibson, a designated scenic highway, after a year of trucks from this project after 654,000 trips a year [1794 trips x 365 days]. The Port should repave Gibson with adequate sub-base capable of withstanding the loads this project will generate.

Underground Utilities. The port regularly undergrounds utilities inside terminals but on Gibson, a designated Scenic Highway, it constructed above-ground power poles. Over time, these poles have had additional cross bars added, to accommodate expanding power demands. This project will add to the power demands and generate additional blight from the above-ground utilities along this Port-community interface.

Sincerely,



Dillon Clark, President
On behalf of the Central San Pedro Neighborhood Council
(Passed by the CeSPNC Board on December 11, 2023)
cc: Board of Harbor Commissioners
Council 15 Office