1 April 2015

Naval Facilities Engineering Command Southwest
DFSP San Pedro EA Project Manager
ATTN: Code JE20.GB
1220 Pacific Hwy.
San Diego, CA 92132-5190


Dear Sir/Madam:

The City of Rancho Palos Verdes has received notice of the proposed closure of DFSP San Pedro, and we attended the open house and public scoping session that was held on March 18, 2015 in San Pedro. We offer the following comments on the scope of the draft Environmental Assessment (EA) to be prepared for this proposal:

1. We understand that, once the draft EA completed, it will be released for a 15-day public review and comment period, as required pursuant to the provisions of the National Environmental Policy Act (NEPA). We further understand that the draft EA could be released by this summer. With summer vacations and other family obligations, we are concerned that residents in Rancho Palos Verdes, the surrounding Los Angeles communities of San Pedro and Wilmington, and the City of Lomita would not have sufficient time to review and provide meaningful comments on the draft EA if only fifteen (15) days are provided to do so. As such, the City of Rancho Palos Verdes respectfully requests that the public comment period for the draft EA be extended to at least forty-five (45) days.

2. The project area for this proposal excludes the sites of the former San Pedro and Palos Verdes Navy housing complexes, as well as portions of the DFSP San Pedro site that are leased for ball fields and a Los Angeles Police Department (LAPD) shooting range. However, the portions of the site utilized by the Palos Verdes Peninsula Land Conservancy (PVPLC) for a native plant nursery and captive breeding program for endangered Palos Verdes blue butterflies do not appear to have been excluded. PVPLC’s operations at DFSP San Pedro are of vital importance to habitat preservation and restoration efforts on the Palos Verdes Peninsula. The draft EA should address both the on- and off-site biological
resources impacts of any changes to PVPLC's operations at DFSP San Pedro that may result from its full or partial closure.

3. We noted at the scoping meeting that there was an apparent discrepancy between the disposition of the underground concrete storage tanks between Alternatives 1 and 2. While both alternatives noted that these tanks would be abandoned in place, Alternative 1 stated that they would be filled with inert material but Alternative 2 only stated that they would be abandoned. We were told that the tanks would be filled under both alternatives, but this needs to be clarified in the draft EA.

4. Alternatives 1 and 3 describe the existing office and administration buildings being maintained in “caretaker” condition, while Alternative 2 describes them as being maintained in “as is” condition. The draft EA should clearly describe what these terms mean.

5. It seems clear that each of the proposed alternatives will result in varying levels of disturbance and disruption of the site. The draft EA should quantify the environmental impacts of each of these alternatives in terms of:
   a. Quantities and depths of earth movement (i.e., cut, fill, import and export)
   b. Number and routing (i.e., Gaffey Street vs. Western Avenue) of truck trips
   c. Air quality, noise and hazardous materials exposure for sensitive receptors

6. We understand that the proposed project does not address the future use of the property in the event of its eventual disposal by the Navy. Nevertheless, we would like to see the draft EA address in general terms the possible future use(s) that might be suitable on the property (in terms of the exposure of future employees, visitors or residents to environmental conditions) under Alternatives 1, 2 and 3.

Again, thank you for the opportunity to comment upon this important project. If you have any questions or need additional information, please feel to contact me at (310) 544-5226 or via e-mail at kitf@rpvca.gov.

Sincerely,

Kit Fox, AICP
Senior Administrative Analyst

cc: Mayor Jim Knight and Rancho Palos Verdes City Council
    Doug Willmore, City Manager
    Caroleynn Petru, Deputy City Manager