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The Port of Long Beach

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February 9, 1993

Ms. Andrea M. Muckerman
Southwest Division - Naval Facilities
Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190
Code 18

Subject: Use of a Residential Scenario to Define Risk Assessment
Screening Criteria for the Long Beach Naval Complex

Reference: January 26, 1993, Long Beach Naval Complex RI/FS
Work Plan Meeting

Dear Andrea:

Following the above referenced meeting, Bob Kanter briefed me on the status of the Long Beach Naval Complex RI/FS process. I am writing to express the Port of Long Beach's concern over the apparent change in approach with regard to future property use scenarios that was announced at that meeting. It is our understanding that the Navy has directed its consultant to assume a residential use scenario as the basis for establishing risk assessment screening criteria. I wish to reiterate the Port's position on this significant issue. We disagree with the use of a residential use scenario because:

- o The Tidelands Trust, which has been established over the years by numerous acts of the State Legislature (e.g., In the Statutes of California, the act entitled "An act granting certain tidelands and submerged lands of the State of California to the City of Long Beach upon certain trusts and conditions" Approved by the Governor May 7, 1935) clearly states that the tidelands will be devoted to the promotion of commerce, navigation, fisheries, and visitor-serving activities. Residential use is specifically excluded as an allowed use. The Naval Station property, once released from federal use, would fall within the State tidelands.
- o The adjacent properties, including the Naval Shipyard, the Port of Los Angeles, and the Port of Long Beach currently support industrial/commercial uses that would be incompatible with residential uses.

PRESIDENT'S "E" AND "E-STAR"
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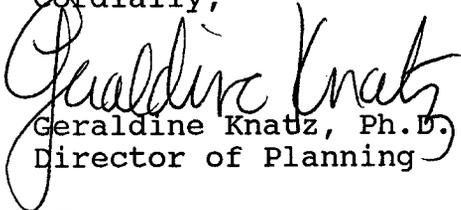


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- o The existing zoning (Port Manufacturing) is incompatible with a residential use.
- o A residential scenario is in direct conflict with the future industrial-use scenario being considered in other adjacent clean-up projects in the two ports.
- o The use of residential clean-up criteria would increase the costs of sampling and analysis, would probably translate into significant time delays, and would almost certainly result in a more costly clean-up.
- o The Port of Long Beach has developed future land use plans, including an alternative with the Naval Station Complex area, that proposes development and expansion of Port commercial/industrial facilities.

As these points make clear, there is no valid reason to consider residential use as a likely scenario for the Long Beach Naval Complex. In fact, the Tidelands Trust provision clearly eliminates residential use as a feasible reuse alternative. Therefore, we respectfully request that the Navy reconsider its decision to utilize the residential scenario, and we recommend the formulation of screening criteria based on future commercial/industrial uses. Thank you for your cooperation in this matter.

Cordially,


Geraldine Knatz, Ph.D.
Director of Planning

BK:s