

# Item 3 Attachments

This item included the following documents related to the San Pedro Noise Impact Study:

1. Letter from the Jones Payne Group
2. HCBF Letter to the Jones Payne Group

March 14, 2019

Meghan Reese  
Executive Director  
**Harbor Community Benefit Foundation**  
302 West 5th Street, Suite 300  
San Pedro, CA 90731

**RE: San Pedro Noise Study**

Dear Meghan,

Thank you for providing comments regarding the draft study that was submitted in May of last year. The following is our team's response to the letter dated February 22, 2019 from the Harbor Community Benefit Foundation (HCBF). We address each of the five points outlined in their letter below. Note that for Items 1 and 2, should HCBF wish to incorporate comments into the reports we would need additional services. For Items 3 and 5 we hope the clarifications are sufficient. Regarding Item 4, we are happy to make the necessary edits.

1. Lack of Nighttime Measurements – For the seven (7) sites that were identified for this study, the impacts were determined to be from port activities only, highway activity only, or a combination of highway and port activity. At one site (Site #1), the loudest port activity from rail activity was determined to be a train horn and occurred only once a day before 9:00 a.m. At Sites #2, 3, 5, 6, and 7 the sites were mainly impacted from noise from the highway that was mostly trucks using the port. Port activity was also observed at these sites. Site #4 is a school and port activity is noted at this location. However, nighttime port activity was determined to not be an issue at the school since it not in use during that period.

Measurements at sites where both highway and port activity noise occurred were largely conducted when the noise levels were at the highest, which usually was daytime hours during periods of high truck traffic. Based on our scope, nighttime noise measurements were only going to be performed "as appropriate". We determined the highest noise levels and the greatest potential for noise impact would occur during daytime hours.

However, we realize the concern about nighttime activity. Should HCBF desire, we could focus on a more limited nighttime measurement program at a limited number of sites and address nighttime only noise levels to address the additional concerns of the Board.

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2. Lack of Linkage Between Measurement Sampling Times and Levels of Port Activity – As mentioned above, at seven (7) potentially impacted sites the impacts were determined to be from either port activities, highway activity, or a combination of both. At one site (Site #1), the most significant port activity from rail was determined to occur only once a day before 9:00 a.m. At all other sites where port activity was observed, noise from the highways was much louder and driving possible noise impact. Although measurements were conducted at various times throughout the several days of testing, we did not conduct measurements to account for variability over different days of the week, different seasons, holiday season, etc. An effort to document port activities during all days and all seasons would be a huge undertaking even while highway noise is driving the noise impact. We felt the undertaking for the City of San Pedro was never meant to be the scope and cost for the City of Wilmington study since we perceived the potential impact as being much less.

Should HCBF desire, we could design a noise monitoring program that would focus on fewer sites, but perform the same measurements over longer periods over all seasons and levels of activity at the port.

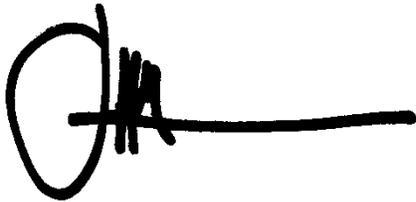
3. Undefined and Arbitrary Assignment of Impact Assessment – Our assessment was intended to be consistent with state/municipal noise impact criteria. Our scope and budget was considerably smaller than the study in the City of Wilmington. This reflected the reduced level of port activity in the City of San Pedro. Based on the CNEL metric we used “impacted”, “likely impacted”, and “not impacted”. This is based on the measurements performed outside at the seven (7) sites and also on interior measurements performed at one (1) site. As a result, Site 6 was “impacted” based on exterior and interior measurements. Sites 2, 3, and 7 were “likely impacted” based on exterior measurements and pending a final determination using interior measurements to confirm noise impact. Sites 1, 4, and 5 were determined to be “not impacted”, where the buildings are expected to have mechanical ventilation, or where the interior noise exposure does not exceed 45 dB CNEL with windows open.
4. Omissions in Figure Documentation and Explanations – This point mentions showing a range of measured values on the mapping sites to aid in interpretation. We agree with this comment that showing contours with noise level impacts would result in easier interpretation for the reader. These contours would prove helpful on Figures 15, 17, 18, and 19. While we did not provide this in our final draft report because we felt the impacts were so minor, this work effort was mentioned in our Task 2B work scope.

5. Study Interpretive Omissions – This comment describes a lack of census/demographic data in the report and suggests using complementary geospatial data layers. After the Phase 1 Survey was completed, the scope of work was outlined for the Phase 2 Measurements. During the survey a total of seven (7) areas that could be potentially impacted from noise were identified. The measurements focused on these seven areas (7) and it was determined early on, that a detailed analysis of census/demographic data using geospatial analysis would not be required. Therefore, this effort was not included in the scope of work.

Please let me know how you wish to proceed and let me know if you have any questions or concerns.

Sincerely,

***The Jones Payne Group, Inc.***

A handwritten signature in black ink, appearing to read 'JHansen', with a long horizontal line extending to the right.

John H. Hansen  
President & CEO

**Board of Directors:**

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**HARBOR COMMUNITY  
BENEFIT FOUNDATION**

The Jones Payne Group, Inc.  
Attention: John Hansen  
123 N. Washington St, 3rd Floor  
Boston, MA 02114

February 22, 2019

Dear John,

We appreciate the opportunity to once again work with The Jones Payne Group to further our understanding of the impacts of Port-related noise in the community of San Pedro, CA. We greatly appreciate your patience as HCBF Staff and the Board of Directors reviewed the draft study that was presented at the June 15<sup>th</sup>, 2018 Board meeting, and as HCBF requested additional expert reviewers.

Based on this review and further discussion, HCBF is requesting that you address the following bulleted items in order to complete the study in order to satisfy the original scope of services:

- Lack of nighttime measurements – Survey responses indicated that nighttime noise was a concern for residents. Nighttime noise is a key public health concern, yet it is not specifically documented in the reported measurements. It is therefore concluded that the report, as currently configured, does not accurately depict port activity and impacts;
- Lack of linkage between measurement sampling times and levels of port activity - Measurement times do not appear to provide expected variability across the sampling times of interest. How do the monitored efforts relate to levels of port activity? Were these measurements conducted during high, medium, or low levels of concurrent port activity? Was an attempt made to capture substantive variability in port activities (different times of day, different days of week, different seasons of year)? Were the port periods of high activity (such as delivery and receipt of goods in preparation for the holiday season) attempted to be captured? What evidence is available to document concurrent port activity levels during periods of noise measurements?
- Undefined and arbitrary assignment of impact assessment - The determinants for designation of “impacted,” “likely impacted,” and “not impacted” do not reflect residents’ stated concerns. What was the basis for these designations? In the absence of objective and/or credible impact definitions that conform with residents’ concerns, the data collected may not provide for accurate interpretation or conclusion. If the measurements collected were not representative of the time periods of residents’ concerns (such as night-time measurements when noise can disproportionately travel and impact neighborhoods), or of variability in port activity (in time or space), the conclusions are likely to be deemed incomplete;
- Omissions in Figure documentation and explanations - Identification of observed range of measured values superimposed on mapped sites of sampling would aid in interpretation of the collected data;
- Study Interpretive Omissions – the current study report lacks viewable and accessible census/demographic data to inform the reader of relative locations of potential vulnerable populations near each sampling and activity site, which could be accommodated by using several complementary geospatial data layers.

More at  
[www.hcbf.org](http://www.hcbf.org)

*Collaborating to build a  
safe, healthy, and  
beautiful San Pedro and  
Wilmington.*

Thank you again for your time and effort to date. We look forward to working together to make the final San Pedro noise study report as informative and useful to the community as possible. Let's plan to talk upon your receipt of this letter so that we can agree on a schedule for completion of the final product.

Sincerely,

Meghan Reese  
Executive Director  
Harbor Community Benefit Foundation

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