

CALIFORNIA COASTAL COMMISSION

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Filed:	Oct. 24, 1996
49th Day:	Dec. 12, 1996
180th Day:	April 22, 1997
Staff:	LJS-SF
Staff Report:	Oct. 24, 1996
Hearing Date:	Nov. 14, 1996
Commission Action:	_____

STAFF REPORT: REGULAR CALENDAR

APPLICATION NO.: 5-96-182

APPLICANT: PORT OF LONG BEACH

PROJECT LOCATION: Upland portion of the former Long Beach Naval Station, Terminal Island, Port of Long Beach, Los Angeles County (Exhibits 1-3)

PROJECT DESCRIPTION: Construction of a 145-acre container cargo terminal consisting of: (1) demolition of all existing structures, facilities, and Piers 6, 7, and 9 at the site of the now-closed Long Beach Naval Station; and (2) construction of a two-ship wharf, ship loading and unloading facilities, container storage areas, trucking facilities, access roadway, entry/exit gate complex, on-dock railyard, administrative and maintenance facilities, utility upgrades, and other associated landside terminal facilities (Exhibit 4).

SUBSTANTIVE FILE DOCUMENTS:

1. Port of Long Beach Port Master Plan (as amended)
2. Final Environmental Impact Report, Port of Long Beach Pier T Marine Terminal, September 1996.
3. Draft Environmental Impact Statement, Naval Station Long Beach Disposal and Reuse, March 1996.
4. Historical and Architectural Assessment - Naval Station Long Beach, Long Beach, California, June 24, 1994.
5. Long Beach Naval Station Adaptive Reuse Study, HOK, Inc., October 1996.
6. Adaptive Reuse of Historic Buildings for Port of Long Beach Naval Station Reuse Plan, October 18, 1996.
7. Naval Station Building Relocation Study, Port of Long Beach, October 11, 1996.

SUMMARY OF STAFF RECOMMENDATION:

Staff recommends approval of coastal development permit application 5-96-182 (Port of Long Beach) with a special condition addressing the Port's legal interest in the property.

STAFF NOTE.

As the proposed development is located within the Port of Long Beach (one of the four commercial ports designated in Chapter 8 of the Coastal Act), and because the project is not appealable under Section 30715, the project will be evaluated for conformance with the policies of Chapter 8 rather than the policies of Chapter 3.

Typically the Port issues coastal development permits for development within its jurisdictional boundary. However, the Commission is reviewing this coastal development permit application from the Port of Long Beach for development within the Port due to the provisions contained in the Port's master plan amendment No. 9, certified by the Commission in July 1996. In that amendment, the Port requested and received Commission certification of allowable land and water uses in the Federal Use Planning District of the Port. The Port also requested that coastal development permitting authority for projects consistent with those land and water uses be retained by the Commission, due to the fact that the Port did not yet have the technical information necessary to document that the port-related developments proposed for that Planning District were in conformance with the Chapter 8 policies of the Coastal Act. Once that documentation was available, the Port would then return to the Commission at a later date with a port master plan amendment (or amendments) for one or more individual projects within the Planning District.

However, in an effort to maintain the Port's rigorous planning and construction schedule for one of those projects (the Pier T Container Terminal), Commission and Port staff agreed that submittal of a coastal development permit to the Commission, rather than a port master plan amendment, would be more time-efficient, and would still subject the project to full analysis for conformance with the Chapter 8 policies of the Coastal Act. The Port then submitted a coastal development permit application (albeit incomplete) to the Commission in August 1996 for the upland and in-water components of the Pier T project. However, in late October it was determined that a clause in Section 30705(c) would prohibit the Commission from approving that part of the project calling for the disposal of dredge spoils at three sites within the Port because those sites were not presently designated as fill sites in the port master plan.

Rather than delay Commission action on a significant port development project due to an unfortunate minor technical oversight, and because the analysis of the proposed fill activity for conformance with the policies of Chapter 8 would be the same in this case for a port master plan amendment or a coastal development permit, it was agreed by the Commission and Port staff that the permit application would proceed and that the Port would submit a follow-up port master plan amendment to the Commission encompassing all components of

the Pier T project. Because additional technical information requested from the Port regarding dredging and disposal plans would not be available until early November, it was also agreed to split the original coastal development permit application into two permit applications: one for landside development and one for in-water development. The subject application, 5-96-182, is limited to demolition and construction activity on the upland portion of the former Naval Station. The permit application for the proposed dredging, disposal, and shallow water habitat mitigation components of the Pier T project is scheduled for the Commission's December 1996 meeting.

The follow-up port master plan amendment is tentatively scheduled for the Commission's February 1997 meeting. The plan amendment analysis of Coastal Act policy conformance will be equivalent to that contained in the two aforementioned coastal development permits, and no new issues will be examined in the February 1997 plan amendment that will not have been reviewed by the Commission in its November and December 1996 permit analysis. In this way, the project timeline will not be severely compromised by a minor technical oversight, the Commission will be able to review all project components for conformance with the applicable Coastal Act policies, and the port master plan will amended in a timely manner to incorporate the Pier T project.

STAFF RECOMMENDATION.

The staff recommends that the Commission adopt the following resolution:

APPROVAL WITH CONDITIONS.

The Commission hereby grants, subject to the conditions below, a coastal development permit on the grounds that the development, as conditioned, is in conformance with the provisions of Chapter 8 of the Coastal Act, and will not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

STANDARD CONDITIONS: See Attachment 1

SPECIAL CONDITIONS.

1. Legal Interest in the Property. Prior to issuance of the coastal development permit, the applicant shall submit to the Executive Director, for his review and approval, evidence that the applicant has obtained legal ownership of the subject property from the U.S. Navy or has obtained a lease from the U.S. Navy to allow the applicant to commence the development proposed in this permit application on the upland portion of the former Long Beach Naval Station.

FINDINGS AND DECLARATIONS.

The Commission hereby finds and declares as follows:

A. Project Description. The Port of Long Beach proposes to develop an approximately 145-acre upland portion of the former Long Beach Naval Station into a marine container terminal (Exhibits 1-4). The Naval Station is located in the heart of the San Pedro Bay Harbor complex comprised of the Ports of Long Beach and Los Angeles, and is surrounded by a wide range of industrial land and water use activities. Construction would include the following components:

Demolition of Existing Facilities. Demolition of 1.3 million square-feet of buildings (including offices, warehouses, food service facilities, living quarters, and recreational facilities (including a gymnasium, swimming pool, and tennis courts)), 2.2 miles of roadway, and three piers, and removal of all landscaping on the site. The eleven buildings, five other structures, and historic landscaping which comprise the Roosevelt Base Historic District (occupying all of the waterfront area and approximately one-half of the total area of the Naval Station) are eligible for listing on the National Register of Historic Places, and are targeted for demolition.

Container Storage. A 112-acre container area located north of the wharf with a capacity to accommodate approximately 17,000 containers, stacked on the ground or placed on trailers, and with electrical outlets for 1,000 refrigerated containers.

Access Roadway and Gate Complex. A seven-acre complex of truck entry and exit gates, gatehouses, and traffic lanes.

On-Dock Railyard. A 26-acre facility running along the western edge of the terminal and extending south onto the Navy Mole, with three working tracks and connections to the regional railroad system on Terminal Island.

Administration and Maintenance Facilities. A five-story administration building at the terminal entrance, a three-story maintenance and repair building, a two-story crane maintenance and longshore building, a two-story railyard control tower/marine operations building, and a one-story container wash building. The total building floor area equals 125,800 square-feet over 1.73 acres, and building heights range from 25 feet to 80 feet above finished grade.

Wharf Construction. A 2,500-foot-long, 112-foot wide reinforced concrete wharf constructed along the existing waterfront in the West Basin to provide simultaneous berthing of two 70,000 dead-weight-ton container ships.

Replacement of Black-Crowned Night Heron Rookery. The Port will create a rookery for black-crowned night herons at Gull Park (located at the tip of the Navy Mole) to replace the rookery that exists in large trees at the Naval Station scheduled for removal during construction of the container terminal.

The Port's coastal development permit application states that

The project site is part of the former Long Beach Naval Station, on Terminal Island, in the southwestern portion of the City of Long Beach,

California. The Naval Station, which fronts on the West Basin, comprises approximately 240 acres of land. The Naval Station was ordered closed in the 1991 round of base closures in accordance with the Defense Base Closure and Realignment Act of 1990. Closure was complete by September 1994, although some facilities continue to be used in support of activities at the Long Beach Naval Shipyard until September 1996.

...The Naval Station includes a large number of structures of various kinds that were used for offices, warehouses, living quarters, and recreational and food service facilities.

The Final Environmental Impact Report (EIR) for the Pier T project described the Naval Station disposal and reuse process. The City of Long Beach, as the designated Local Reuse Authority (LRA) for the Navy, conducted a four-year screening process for viable reuse proposals for the Naval Station. The proposals included social services facilities, maritime university, regional police academy, regional airport, port-related development, and other proposals. The Final EIR stated that many of the proposed uses faced serious legal impediments and constraints under the California Constitution, the Tidelands Trust, the California Coastal Act, and local zoning, and that the proposed reuse of the Naval Station needed to be coastal-dependent and water-related.

The Final EIR reported that the LRA established various economic and employment enhancement goals for reuse of the Naval Station, that the Port of Long Beach proposal to develop the site for port-related uses was the only proposal consistent with the legal setting and reuse goals, and that the LRA recommended that the Navy accept the port facility proposal. The Navy accepted the LRA recommendation and prepared a Draft Environmental Impact Statement for the disposal and recommended reuse plan. Formal transfer of the Naval Station to the City of Long Beach (the Port of Long Beach is an official department of the City) is expected to occur in 1997; the Navy and the City/Port are expected to enter into a lease agreement for interim use of the Naval Station until the transfer process is completed.

The Commission staff found that the Port of Long Beach, as the proposed receiver of the Long Beach Naval Station (as documented in the Navy's base reuse process for the Naval Station), demonstrated adequate legal interest in the subject property to submit a coastal development permit application to the Commission for the proposed project. However, in order to ensure that the Port of Long Beach has the legal ability to commence development of the project described in the subject coastal development permit application, the Commission conditions this permit to require that prior to issuance of the coastal development permit, the Port shall submit to the Executive Director, for his review and approval, evidence that the City/Port has obtained legal ownership of the subject property from the U.S. Navy or has obtained a lease from the U.S. Navy to allow the Port to commence the development proposed in this permit application.

B. Land Uses. Chapter 8 of the Coastal Act provides the following:

Section 30701. The Legislature finds and declares that:

(a) The ports of the State of California, including the Humboldt Bay Harbor, Recreation, and Conservation District, constitute one of the state's primary economic and coastal resources and are an essential element of the national maritime industry.

(b) The location of the commercial port districts within the State of California, including the Humboldt Bay Harbor, Recreation, and Conservation District, are well established, and for many years such areas have been devoted to transportation and commercial, industrial, and manufacturing uses consistent with federal, state and local regulations. Coastal planning requires no change in the number or location of the established commercial port districts. Existing ports, including the Humboldt Bay Harbor, Recreation, and Conservation District, shall be encouraged to modernize and construct necessary facilities within their boundaries in order to minimize or eliminate the necessity for future dredging and filling to create new ports in new areas of the state.

Section 30708. All port-related developments shall be located, designed, and constructed so as to:

(a) Minimize substantial adverse environmental impacts.

(b) Minimize potential traffic conflicts between vessels.

(c) Give highest priority to the use of existing land space within harbors for port purposes, including, but not limited to, navigational facilities, shipping industries, and necessary support and access facilities.

(d) Provide for other beneficial uses consistent with the public trust, including, but not limited to, recreation and wildlife habitat uses, to the extent feasible.

(e) Encourage rail service to port areas and multi-company use of facilities.

When evaluating proposed port development the Commission is guided by the provisions of Section 30701 of the Coastal Act which state that the four ports governed by Chapter 8 of the Coastal Act (referred to as Chapter 8 ports), including the Port of Long Beach, are a "primary economic and coastal resource" of the state, and that they are "encouraged to modernize and construct necessary facilities within their boundaries." The Commission has a long history of implementing those policy directives in its review and approval of numerous port landfills for the development of cargo and terminal facilities, and in its approval of land and water use changes to allow for redevelopment of existing port facilities. At the same time, the Commission has consistently encouraged the Port of Long Beach to explore opportunities to acquire upland property within and adjacent to the port that could be used for port-related facilities in order to minimize the need for the hundreds of acres of new landfills envisioned in the Port of Los Angeles/Port of Long Beach "2020 Plan" (The "2020 Plan" is a conceptual planning document to guide harbor expansion in San Pedro Bay, and was never brought before the Commission for formal endorsement or approval).

In recent years the Port of Long Beach purchased several hundred acres of land previously owned by the Union Pacific Resources Company within and adjacent to the port with the intent to construct new cargo terminals, and the Port submitted a reuse plan during the Long Beach Naval Station disposal and reuse process. These previous actions and the proposed cargo terminal development at the former Naval Station outlined in this permit application conform with the guidance contained in Section 30701. Construction of the proposed container terminal on existing upland eliminates the need to construct a new landfill, avoids the incremental loss of coastal waters to port landfills, and eliminates the need for marine resource mitigation. The proposed project is clearly beneficial to a primary coastal resource -- the maritime mission of the Port of Long Beach -- and the Commission finds that the project conforms with Section 30701 of the Coastal Act.

Next the Commission must evaluate the proposed demolition of existing structures and facilities, and the construction of the container terminal, for conformance with the policies of Section 30708. Because the subject permit application does not include dredging or filling, the policies of Section 30705 and 30706 are not applicable. Likewise, because the application does not propose commercial fishing or tanker terminal activity, Sections 30703 and 30707 are not applicable. Section 30708 of the Coastal Act calls for port-related developments to be located, designed, and constructed so as to minimize substantial adverse environmental impacts, give highest priority to the use of existing land space within harbors for port purposes, and to provide for other beneficial uses consistent with the public trust to the extent feasible. The Commission finds that the proposed development is the highest priority use of the subject property, particularly given its central location within the Port of Long Beach/Port of Los Angeles harbor complex, and given that the project will not adversely affect coastal resources.

As noted in the project description, construction of the proposed container terminal first requires the demolition of all existing structures and facilities at the former Naval Station. A portion of the Naval Station, the Roosevelt Base Historic District, is eligible for listing on the National Register of Historic Places due to its association with the pre-World War II development of naval facilities on the Pacific coast (Exhibits 5 and 6). Because of its eligibility for the National Register, the Roosevelt Base District is also included in the California Register of Historical Resources. In addition, several of the buildings were designed by Paul R. Williams, an architect of national stature and "probably the best known and most accomplished African-American architect of all time" (Historical and Architectural Assessment, 1994). Due to these factors, and the potential loss of modern recreational facilities, the proposed demolition and redevelopment has generated significant controversy in the local Long Beach community (Sample of letters received, Exhibits 7-11; sample of newspaper articles, Exhibits 12-14).

The project EIR examined several alternatives to demolition of the Naval Station, including adaptive reuse of the entire District, adaptive reuse of several combinations of structures, and adaptive reuse of individual structures. The EIR concluded that none of the alternatives were feasible given the physical constraints of the structures themselves, the restrictions of the tidelands trust grant, the policies of the Coastal Act, and the results

of the Naval Station reuse study. The EIR does identify mitigation measures that could be implemented to lessen but not eliminate the significant adverse impact on historical resources from the demolition of the Naval Station. These include:

Salvage and preservation of architectural information and materials.

Videotape record of the existing structures and setting.

Creation of a physical or computer model of the Roosevelt Base.

Design of facades of new buildings in the International Style to reflect elements of the Roosevelt Base.

Further documentation of the history of the Roosevelt Base.

The EIR states that:

Section 106 of the National Historic Preservation Act requires ... consultation toward the goal of reaching agreement on avoiding or mitigating adverse impacts to historic structures. The Department of the Navy, the State Office of Historic Preservation (SHPO), and the Advisory Council on Historic Preservation (Advisory Council) are currently consulting as part of the closure of the Naval Station. The consultation process mandated by Section 106 that the Navy, SHPO, and the Advisory Council are undertaking as part of the base closure and realignment process is designed to result in a Memorandum of Agreement (MOA), a legally binding document that will state those specific measures that will be taken to reduce or avoid the effects on historic properties.

The Section 106 consultation is continuing as of this date and includes local historic preservation groups. Resolution of this issue was not achieved as of the date of this report.

Notwithstanding the potential historic significance of Naval Station buildings, the Commission finds that the demolition of the existing structures at the Naval Station, including those eligible for listing on the National Register of Historic Places, will not result in a substantial adverse environmental impact. Chapter 8 policies state that the Port of Long Beach is one of the state's primary coastal resources, call for port modernization, call for the protection of commercial fishing facilities, include provisions for protecting marine resources within the waters of the ports, but do not include policies for the protection of historic structures within the port. As the project is limited to the upland portion of the Naval Station, it will not adversely affect any of the coastal resources referenced in Chapter 8.

The Commission has in numerous past actions approved port development that adversely affected coastal resources. In some instances, resource damage in the Ports of Long Beach and Los Angeles could be mitigated (tidal wetland restoration as mitigation for loss of deep-water habitat from landfills) and in other instances it could not (loss of protected open water area for recreational boating due to landfill construction). In these instances, the Commission found that adverse environmental impacts generated by a project

were minimized, but not necessarily eliminated, and therefore conformed to the policies of Chapter 8. Although the Commission does not take lightly the potential cultural resource impact from the demolition of buildings on the Naval Station, it finds that under the applicable policies of Chapter 8 of the Coastal Act the proposed demolition and construction of a container terminal at the Naval Station conforms with the port and resource protection policies in Section 30708 of the Coastal Act.

Section 30708(c) states that the highest priority for the use of existing land space within the Chapter 8 ports shall be for port purposes such as navigational facilities, shipping industries, and necessary support and access facilities. Section 30708(d) states that other beneficial uses consistent with the public trust, including recreational uses, shall be provided to the extent feasible. These provisions are one of the key policy statements in Chapter 8. The Coastal Act explicitly recognizes how essential the Port of Long Beach is to the state and national economy and, as a result, clearly states that the aforementioned port-related uses are the highest priority land and water uses in the four commercial ports designated in Chapter 8.

The Commission has consistently held over the years that the land and water areas within the boundaries of the Chapter 8 ports must be protected for port-related uses. Development for other uses consistent with the public trust should only be approved when such activity would not constrain the ability of the ports to modernize and expand in order to remain competitive in the international trade and shipping market and to remain a strong factor in the state and regional economy. The location of the Long Beach Naval Station, in the heart of the San Pedro Bay harbor complex shared by the Ports of Long Beach and Los Angeles, is ideally suited for redevelopment into primary port uses, such as the container terminal proposed in the subject coastal development permit. The retention or expansion of non-port-related uses (e.g., recreation, commercial) at this location would defeat the clear intent of the Chapter 8 port policies, would lead to inevitable conflicts between port activities and non-port activities, and would ultimately lead to the need for additional port landfills and the resultant loss of marine habitat and resources.

The Commission certified the Port's master plan and amendment No. 6, both of which call for all recreational, visitor-serving, and other non-port-related land and water uses to be located in the Queensway Bay Planning District of the Port. While the standard of review for the proposed development is the Chapter 8 policies of the Coastal Act, redevelopment of the Naval Station into the proposed container terminal is also consistent with the overall goals of the certified port master plan, and with the land and water use designations for the Naval Complex certified by the Commission in July 1996 in port master plan amendment No. 9. Therefore, the Commission concludes that while the proposed development would lead to the loss of potentially significant World War II-era structures on the Long Beach Naval Station, the highest priority use for the subject property is the proposed container terminal, and that the project conforms with the port policies of Chapter 8 of the Coastal Act.

C. California Environmental Quality Act. Section 13096 of Title 14 of the California Code of Regulations requires Commission approval of coastal

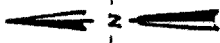
development permits to be supported by a finding showing the permit, as conditioned, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(i) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

The proposed project, as conditioned, has been found to be consistent with the Chapter 8 policies of the Coastal Act. All adverse impacts have been mitigated by conditions of approval and there are no feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. On September 3, 1996, the Port of Long Beach certified the Environmental Impact Report for the Pier T Marine Terminal, which includes the development included in the proposed project. Therefore, the Commission finds that the proposed project can be found consistent with the requirements of the Coastal Act to conform to CEQA.

ATTACHMENT

Standard Conditions

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.



5-96-182

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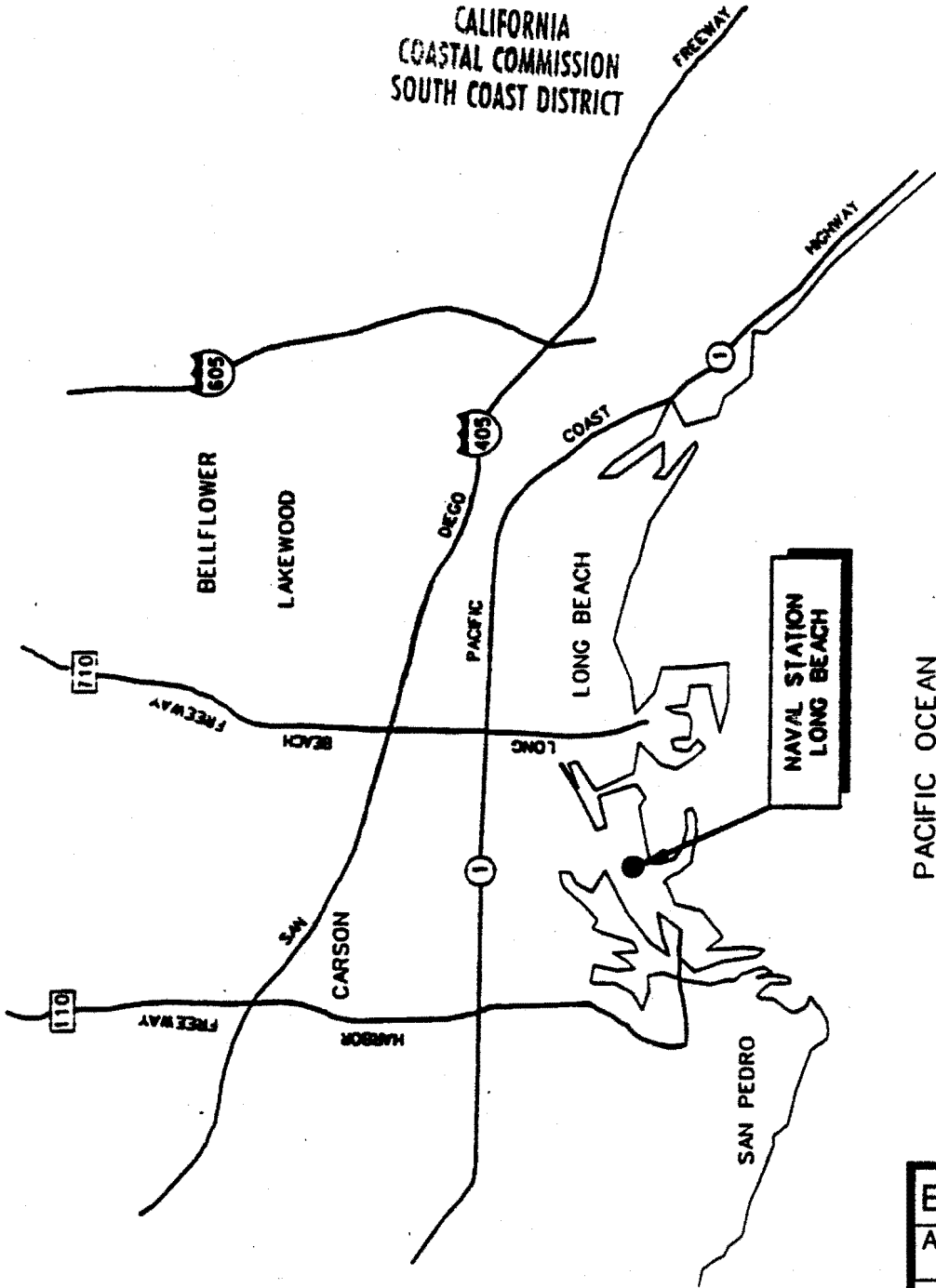
AUG 23 1996

CALIFORNIA
COASTAL COMMISSION
SOUTH COAST DISTRICT

NOT TO SCALE

Southwest Division Naval Facilities Engineering Command
Naval Station Long Beach

Vicinity Map

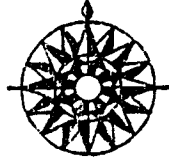


PACIFIC OCEAN

EXHIBIT NO. 1
APPLICATION NO.
5-96-182
California Coastal Commission



THE PORT OF
LONG BEACH



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Scale in Feet

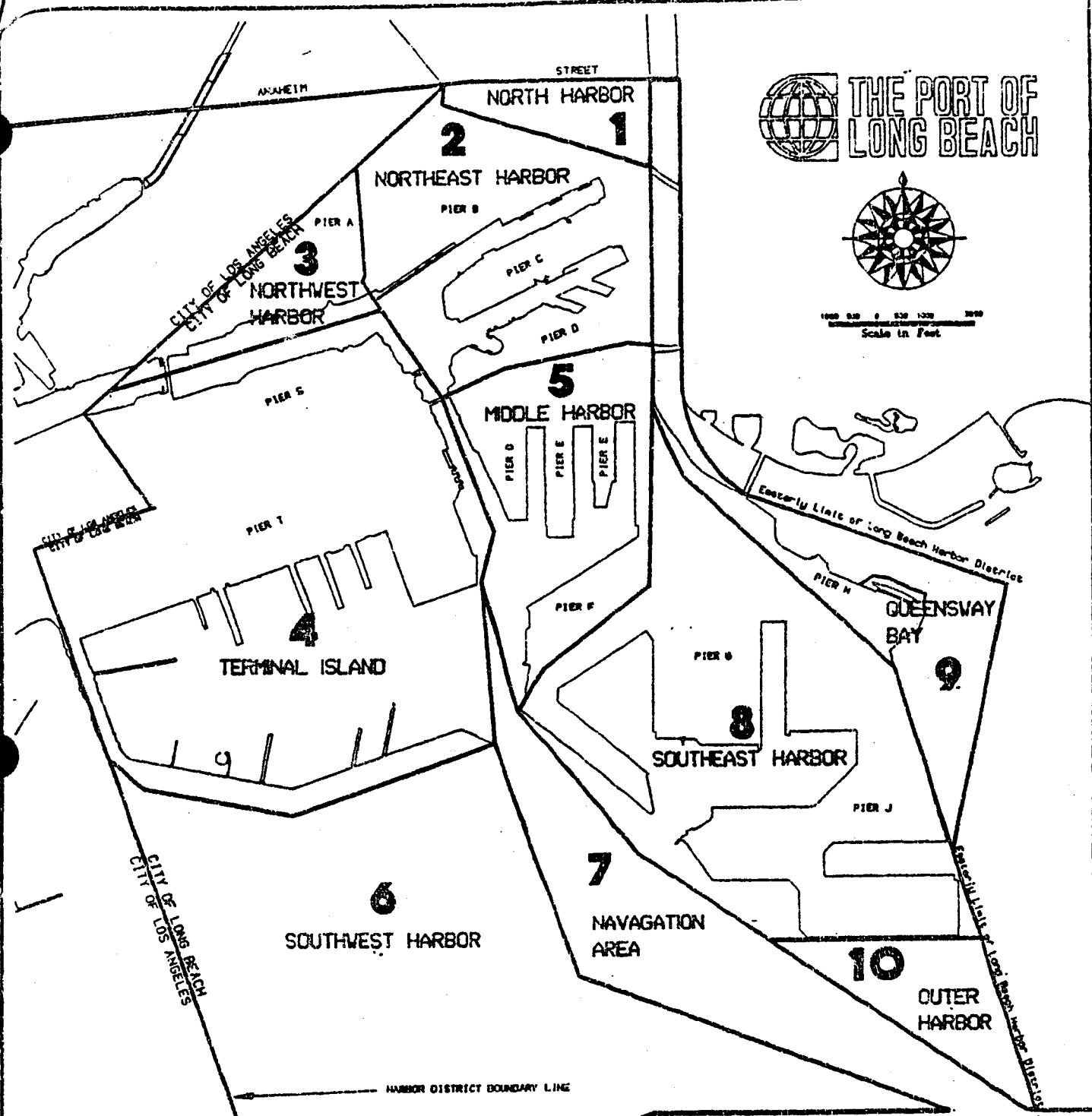


FIGURE 2.
PROPOSED
LONG BEACH HARBOR
PLANNING DISTRICTS

EXHIBIT NO. 2
APPLICATION NO.
S-96-182
California Coastal Commission

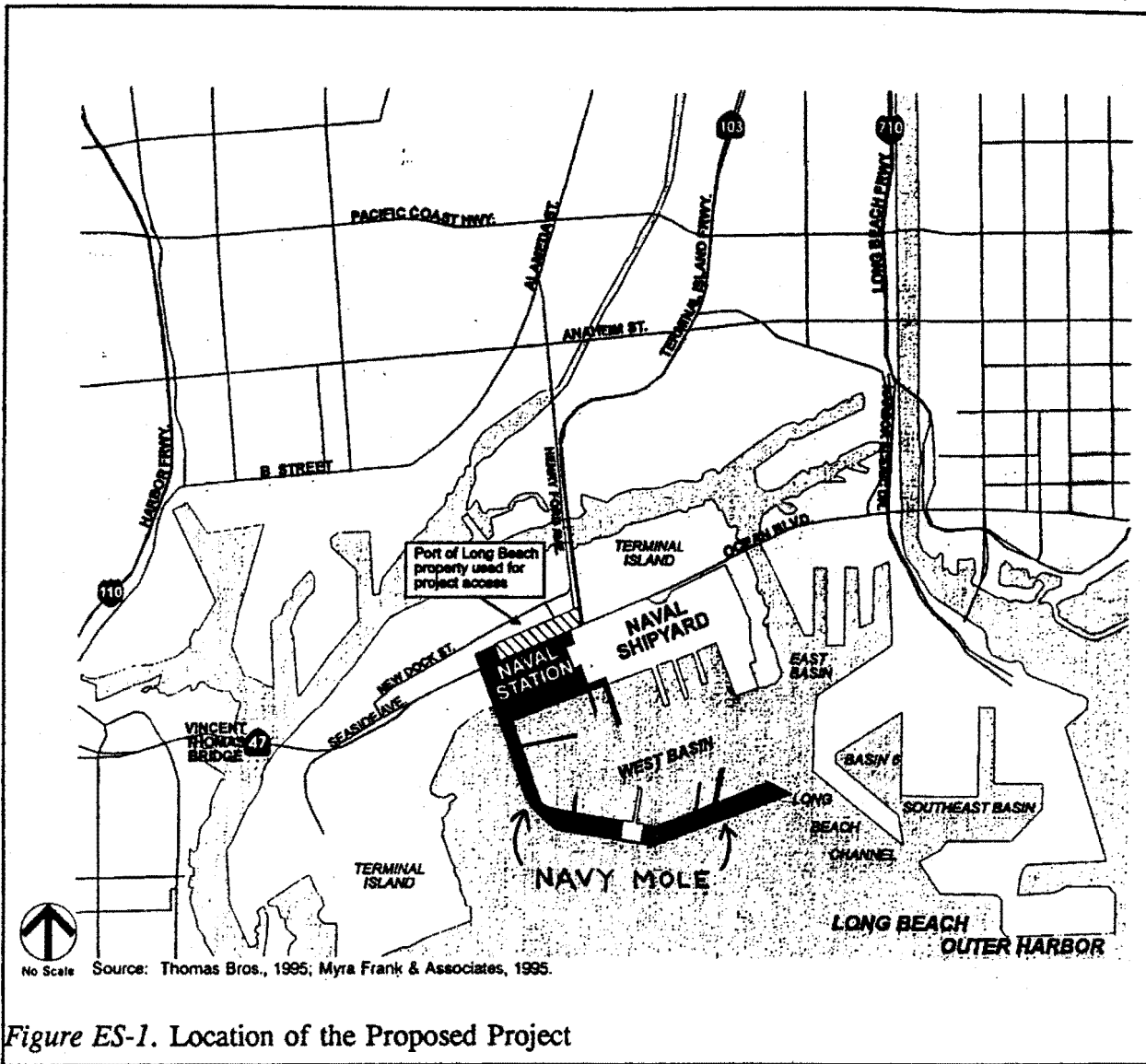


Figure ES-1. Location of the Proposed Project

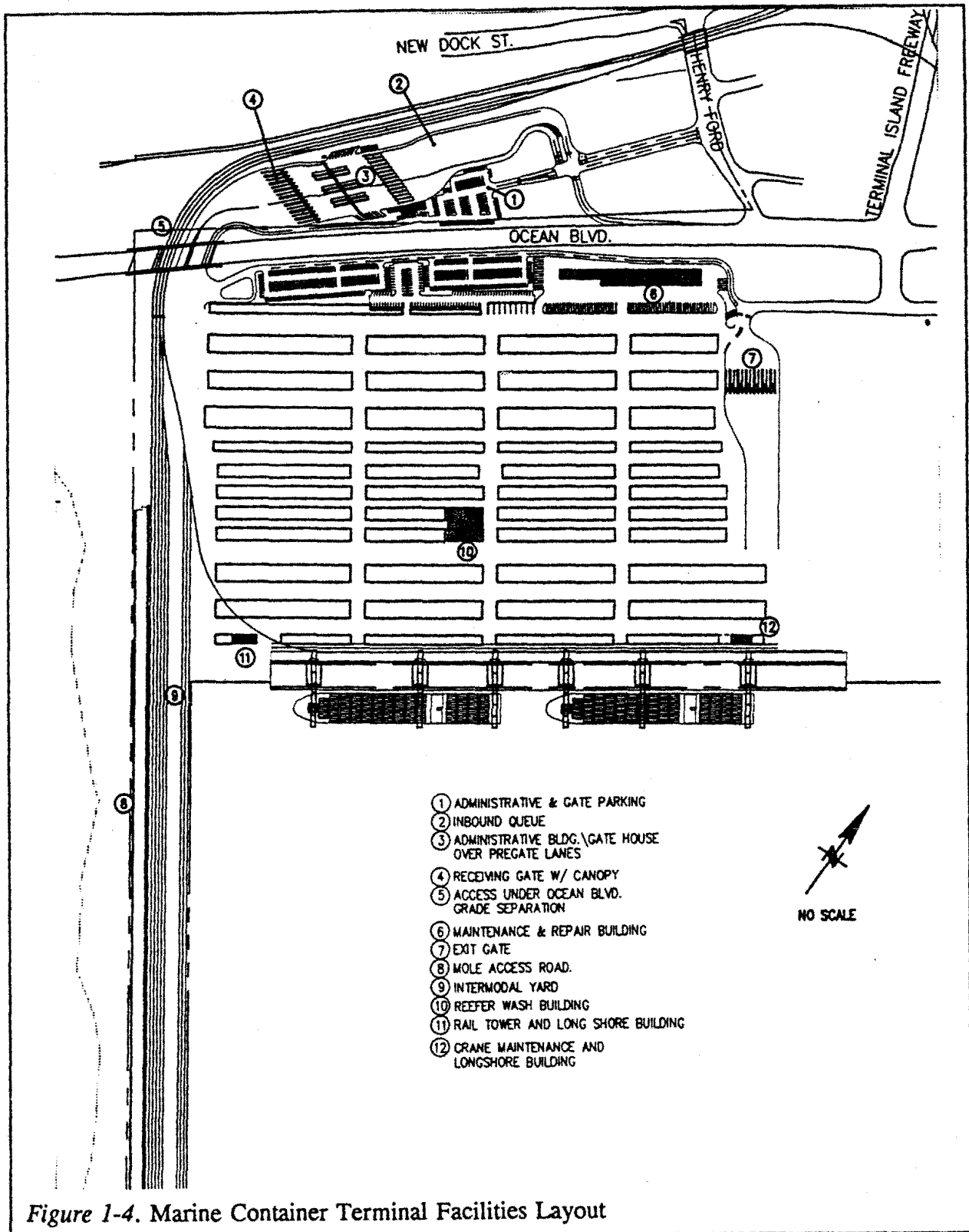
An interim lease of the Navy Mole has been granted to the City of Long Beach and was the subject of a Negative Declaration prepared by the Port of Long Beach in accordance with the requirements of CEQA. That Negative Declaration considers several independent projects to be constructed on the Navy Mole.

Alternatives Considered

The City of Long Beach, as Local Reuse Authority (LRA) for the Navy, conducted a four-year screening process for viable reuse proposals for the Naval Station and Navy Mole. The proposals received by the LRA, briefly summarized below, ranged from

EXHIBIT NO. 3
APPLICATION NO.
5-96-182
California Coastal Commission

Project Description



- ① ADMINISTRATIVE & GATE PARKING
- ② INBOUND QUEUE
- ③ ADMINISTRATIVE BLDG. \ GATE HOUSE OVER PREGATE LANES
- ④ RECEIVING GATE W/ CANOPY
- ⑤ ACCESS UNDER OCEAN BLVD. GRADE SEPARATION
- ⑥ MAINTENANCE & REPAIR BUILDING
- ⑦ EXIT GATE
- ⑧ MOLE ACCESS ROAD.
- ⑨ INTERMODAL YARD
- ⑩ REEFER WASH BUILDING
- ⑪ RAIL TOWER AND LONG SHORE BUILDING
- ⑫ CRANE MAINTENANCE AND LONGSHORE BUILDING



Figure 1-4. Marine Container Terminal Facilities Layout

EXHIBIT NO. 4
 APPLICATION NO.
 S-96-182

California Coastal Commission

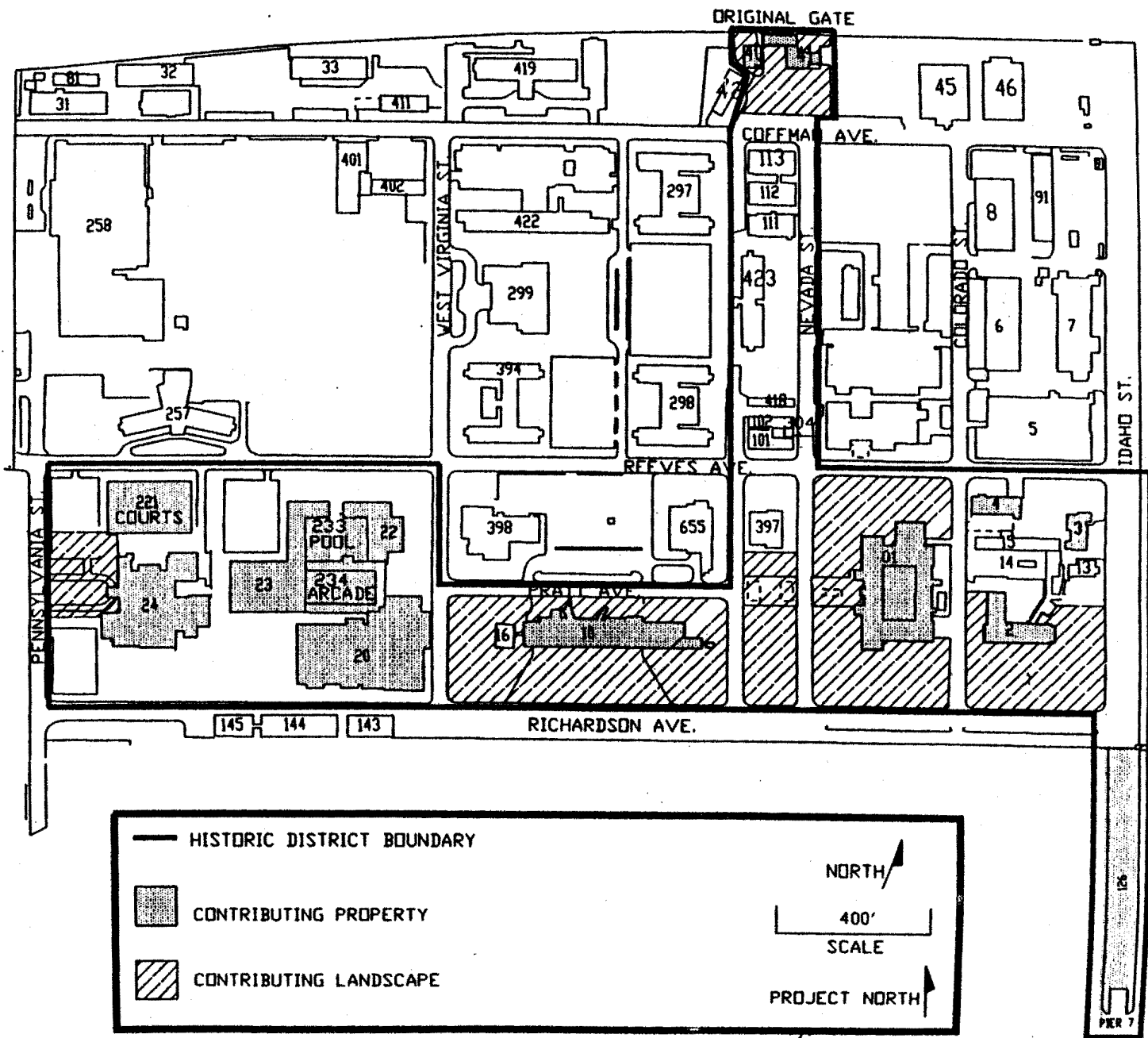


FIGURE 4. ROOSEVELT BASE HISTORIC DISTRICT

 California Coastal Commission	EXHIBIT NO. 5
	APPLICATION NO. S-96-182

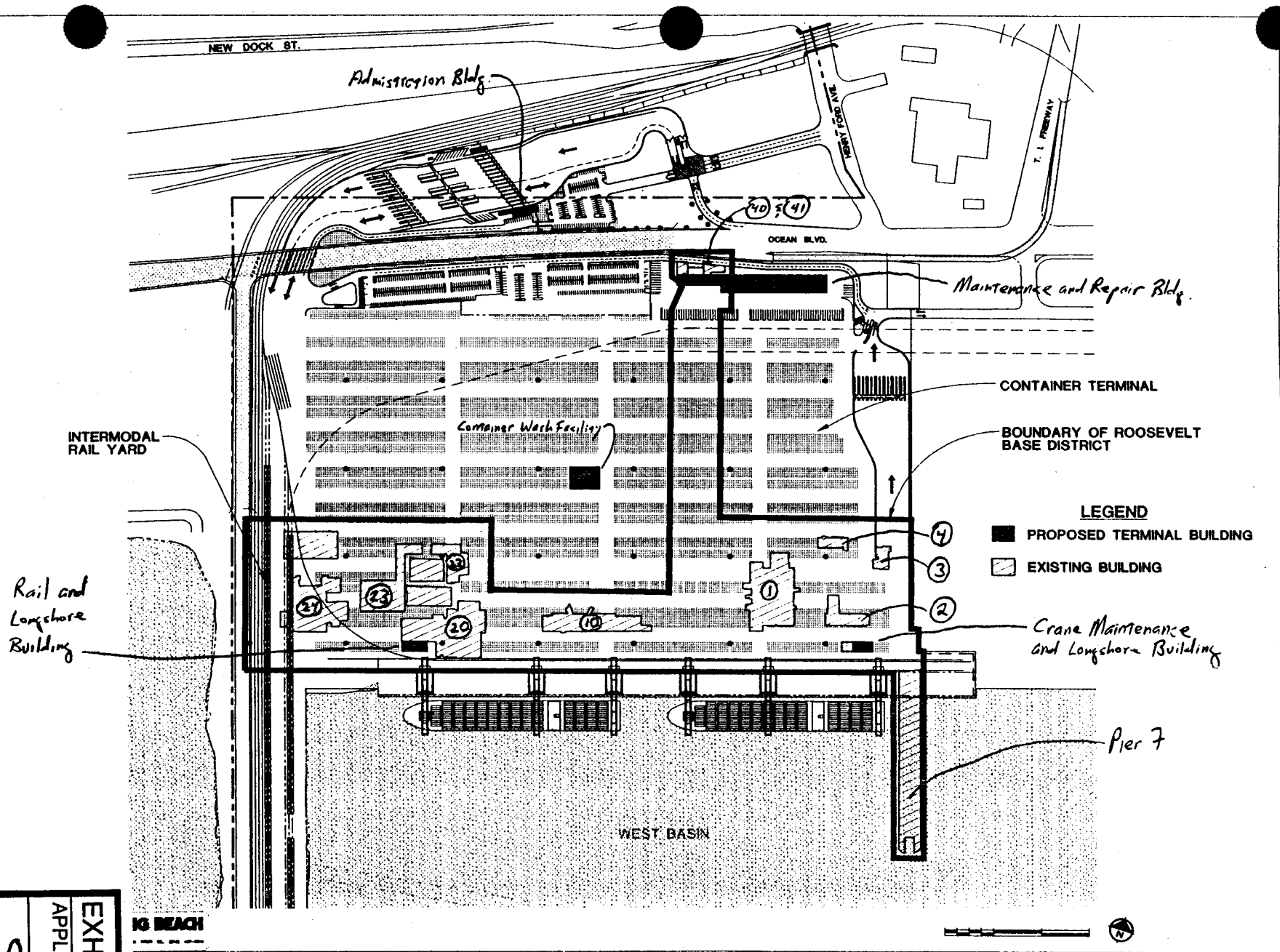


Figure 5. Location of Historic District Buildings Within Container Terminal

 California Coastal Commission	EXHIBIT NO. 6
	APPLICATION NO.
	S-96-182

2928 Monogram Avenue
Long Beach, Calif. 90815-1538

August 19, 1996

California Coastal Commission
45 Fremont Street
Suite 2000
San Francisco, Calif. 94150-2219

AUG 26 1996

CALIFORNIA
COASTAL COMMISSION

On Sunday, August 18, 1996, we toured the Long Beach Naval Station along with about 4,000 other citizens who are concerned about the proposed conversion of this beautiful, historic and useful place into a parking lot for shipping containers.

The Long Beach Naval Station, in it's present state, is made to order for a multitude of uses that would directly and immediately benefit the people of Long Beach and surrounding communities. These include a sports complex (all of the necessary facilities are in place in a beautiful setting.....a wonderful gym, large swimming pool, athletic fields and ball diamonds), training facilities (shops and work places) for training the people needed in the industrial arts and trades, meeting places for all kinds of community organizations, including the U. S. Naval Sea Cadets, plus living and restaurant facilities. We are sure that any number of additional uses will become apparent once the property is made available for use by all of the people.

It is now very apparent to us that there has been a carefully organized and orchestrated effort to keep this and other information from the people, especially in the way information is and has been managed and manipulated by the local newspaper.

We believe that private business interests, some of them foreign, are behind the conversion scheme and that they have no other objective than their unjust enrichment at public expense; also that their considerable influence and wealth manifests itself in the actions of the Long Beach City Council regarding this matter.

It has been claimed that turning this wonderful property into a highly automated cargo terminal will create many jobs. This is very doubtful. You can be sure that when big profits are envisioned, all possible labor saving devices will be employed.

You are therefore requested to take whatever measures necessary to make sure that this valuable facility is used for the direct and immediate benefit of the people who paid for it with their tax dollars and not for private profit or political leverage.

RECEIVED

SEP 10 1996

CALIFORNIA
COASTAL COMMISSION

Sincerely,

William B. Skinner
William B. Skinner

Margery E. Skinner
Margery E. Skinner

RECEIVED

EXHIBIT NO.
APPLICATION NO.
5-96-182
California Coastal Commission

CC
501

Long Beach

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SEP 9 1996

AUG 26 1996

CALIFORNIA
COASTAL COMMISSION

CALIFORNIA
COASTAL COMMISSION

California Coastal Commission SOUTH COAST DISTRICT
45 Fremont Street, Suite 2000
San Francisco CA.

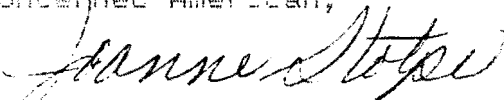
I am writing as a concerned American. My Uncle and 2 cousins went through Long Beach during WW11. My father-in-law laid cement there, in the the early '40's, for gun emplacements.

This is a part of our American history and should be kept as such. We Americans travel to Europe to see European history, why not save our own history for our ancestors to visit? Someone suggested the Smithsonian might be interested in having a place on the West Coast. Why not Long Beach. The 12 year, 18 million dollar barracks might make a nice hotel-motel, and with the great sports facilities all ready in place, what could b nicer. Please do some rethinking on this important decision.


Yes, I was one of the many who visited the base Sunday Aug.18th. I am very upset to think that beautiful area and all the historical buildings will be destroyed and leveled so the cement jungle can grow even larger.

PLEASE PLEASE PLEASE, think again.

Concerned American,



Joanne Stolpe
905 N. Lamer
Burbank, CA. 91506

EXHIBIT NO. 8
APPLICATION NO.
5-96-182
 California Coastal Commission

3 September 1996

Mayor Beverly O'Neill
333 West Ocean Blvd.
Long Beach, CA. 90802

Dear Mayor O'Neill:

My husband was raised in the Los Altos section of Long Beach. I became a resident in 1986. We are both in our late forty's and retirement planning is increasingly part of our life. Many of our neighbors worked hard over the years to maintain the quality of our area and many left during the Tom Clark years of blind development and greed. This hurt our neighborhood and the Long Beach economy. Our new neighbors are now mostly renters.

Recently we are increasingly swayed toward leaving this area at retirement. For many of us the decision regarding the Naval Base is a pivotal one because we have been misled so many times. Some recent examples:


- Long Beach residents (ourselves included) were told that we have to destroy El Dorado park lands for a "Sports Complex" because nothing like it was available. Not true. The base has excellent facilities.
- The city continues to build NEW schools when facilities exist which could be used.
- The college pushed through "the blue pyramid" (our local eyesore) under the guise that no such facility existed within Long Beach - failing to mention - one did.
- You don't explain on national TV (Huell Houser KCET) that "the deal is done" and that we must sell this land to COSTCO so they can bring in Chinese goods produced by prison labor. Intelligent business people know there are *always* alternatives.
- You don't insult your residents by telling them they have had five years to evaluate this situation. Public access to the base was *only* granted this January and either our public officials were lying to us on all the above - or they didn't know either! In either event to set September as a dead line is beyond all rational decision making.

If this decision moves forward, what little faith we have in our Long Beach future will be lost. To tear down perfectly useable buildings, when facilities like these are desperately needed is *insanity*. The *ONLY* way to prevent the Long Beach/LA Riots from devastating us again is to educate our youth and provide low cost alternatives to keep their energy positively focused. We now have a place where a sense of "community" could flourish and grow.

We watch our city council meetings with dismay, there are so many short sighted views. However, the Naval Base decision will be decisive for us. If the city bulldozes a green belt, demolishes perfectly sound buildings paid for with our tax dollars, and fills in that Olympic pool, then the inmates really have taken over the asylum, and we don't want to be left to their tender mercies in our retirement years.

Thank you for considering our view point. God willing there are enough like us, who speak up, to prevent this absurd waste of resources and tax payer dollars.

Phillip & Kim Allard
2101 Gondar Ave.
Long Beach, CA. 90815-3331
C: Department of the Navy
California Coastal Commission
Long Beach City Council
Long Beach Harbor Commission

EXHIBIT NO. 9
APPLICATION NO.
S-96-182
 California Coastal Commission

Judith A. Rothrock, Esq.
24191 Becard Drive
Laguna Niguel, CA 92677
(714) 448-8345

September 16, 1996

Captain M. R. Johnson
United States Navy
c/o Long Beach Heritage
P. O. Box 92521
Long Beach, CA 90809-2521

Dear Captain Johnson:

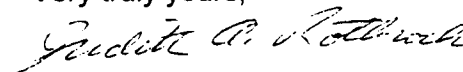
The Long Beach Naval Station is an invaluable and unique historic, cultural and recreational facility which must be saved from destruction. It includes state-of-the-art recreational facilities that are presently used by community groups, such as the Police Athletic League for its youth programs. Moreover, its buildings are eligible for the National Register of Historic Places and deserve to be preserved and maintained for future generations. The base would also be ideal for a maritime museum. Surely the interests of the public should come before the interests of mainland China in a cargo container terminal.

It is important to note that the decision to demolish the base was made without the input of the public and without our knowledge of what would be lost, since the base was off-limits to the public during its years of operation.

Very rarely do we have the opportunity presented here. It is a tragic waste of our resources and a sad commentary on the short-sightedness of public officials in Long Beach that they are willing to ignore the public's interests in favor of economic interests that may well be achieved by other means.

Over 50 people, residing in various local cities, have signed the enclosed petition. We urge you not to approve the City's or Port Authority's present plans. We need a thorough reuse study, but more importantly, we need dedicated, courageous and visionary leaders who recognize the base as a place worthy of our best efforts to find alternative uses for it and to actively promote such uses.

Very truly yours,



Judith A. Rothrock

Enclosure: Petition
Mailing List

Judith
A

EXHIBIT NO. 10
APPLICATION NO.

5-96-182

Fidelity Nation:
17911 Von Karman Avenue
(714) 62

California Coastal Commission

RECEIVED
SEP 23 1996

CALIFORNIA
COASTAL COMMISSION

Friday, September 13, 1996

Frank J. Puz
3184 Petaluma Avenue
Long Beach, Ca. 90808

California Coastal Commission
45 Fremont Avenue
San Francisco , California

Dear Sir:

As a teacher in the Long Beach Unified School District, vocational education instructor and parent, I am appalled to learn that the City of Long Beach plans to demolish the Roosevelt Historic District. The Roosevelt Historic District offers the community a perspective of naval history that can never be replaced. By preserving the district and the architecture of Paul Revere Williams, the Navy could render a positive message that hard work, perseverance and excellence are valuable and worthy of individual aspiration.

A multiple use plan for the Long Beach Naval Station makes perfect sense. The City of Long Beach, after years of deficit spending are blindly looking to generate any economic activity at any expense regardless of the project's merits. It is time to stand up for America and defeat the crass commercial interests of the Gang of Four... Mayor O'Neil, the Longshoremen's Union, the Port of Long Beach and the Chamber of Commerce. Reuse plans are innumerable; we should be looking after the interest of Americans and not the Red Chinese.

Respectfully



Frank J. Puz

EXHIBIT NO. 11
APPLICATION NO.

5-96-182

 California Coastal Commission

9-4-96

Light Brews Over Use of Naval Base

By JEFF LEEDS
TIMES STAFF WRITER

At the heart of the soon-to-be-shuttered Long Beach Naval Station is a ficus-studded lane that leads from a breezy vista on the San Pedro Bay waterfront to a sparkling 25-meter pool and a professional-quality basketball court. Around the corner sit four fully lit softball fields with fresh chalk on the baselines.

And down the road, on the other side of a chain-link fence, a bulldozer waits to devour it all.

After the Navy announced in 1991 that it planned to close the 170-acre base, laying off about 500 military and civilian personnel, city officials

Please see NAVY, A10

NAVY: Plan to Raze Base Provokes Fight

Continued from A1

personnel, city officials thought that deciding what to do with the abandoned Navy land was a no-brainer.

Seeking to mend Long Beach's battered economy, the City Council agreed to turn over the base property to the city's port, which planned to pave it over and turn it into a cargo container yard.

Now, a group of historic preservationists has joined in a unique partnership with park users and sports enthusiasts to save not just a smattering of historic buildings—some designed by the late Paul R. Williams—but more importantly the newer buildings and state-of-the-art recreational facilities that they say the community desperately needs and could never afford to replicate.

"It's a terrible waste," said John Hill, an Army veteran who took a few last laps in the pool the other day. "Just to use it as a parking lot seems tragic."

In a last-minute bid to spare the base, activists argue that the modern facilities and historic buildings could offer a wide array of activities, from maritime training to recreation for wayward children.

Although still hidden from passersby on the road outside, the former Navy support station offers a 32-lane bowling alley, an outdoor performance stage, corporate-style conference rooms and office space and an officer's club, plus acres of grassy spaces on the waterfront.

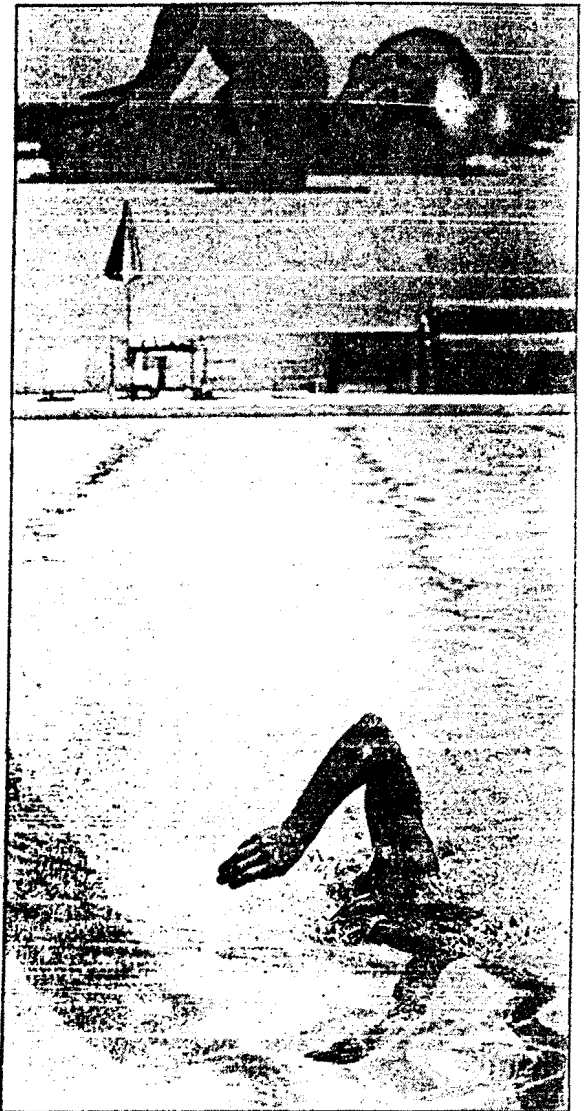
While the 1,500 sailors who remain there have all but packed their bags, a loose-knit collection of civilians has banded together in recent weeks to halt the demolition. The effort began when historians from the preservationist organization Long Beach Heritage discovered that several base buildings were eligible for the National Register of Historic Places. They were quickly joined by Save the Park by Sharing Information, a group seeking to protect city parks from development.

Even Huell Howser, the Charles Kuralt-esque host of the public broadcasting television show "California's Gold," has turned his usually cordial program into something of a bully pulpit to save the land. "No one's against world trade," Howser said. "The question is, is this the only place you can pave to build a container yard?"

To hear city and port officials tell it, the answer is yes. Although the Navy hasn't officially signed over the land, the port has inked a letter of intent to lease the property to China Ocean Shipping Co., a steamship line run by the Chinese government and one of the port's fastest-growing tenants. The city's base closure consultant said the terminal would create about 650 jobs, and indirectly as many as 60,000.

The law governing use of the property dates to the early part of the century, before the land became a Navy installation. Once the Pentagon signs over the property, it has little say in its fate. In this case, federal officials say they will defer to California tidelands law, which states that the land must be put to commercial, navigational or fisheries-related use.

Of the land-use proposals presented to the city, the port's was considered the best plan under those criteria, officials said.



CLARENCE WILLIAMS / Los Angeles Times

Michael Chan swims in pool at Long Beach Naval Station. Demolition is planned for facilities.

erty. But, he said, knowing more about the base's facilities wouldn't necessarily change his mind or his vote.

Two Navy studies submitted to the city before its vote on the property last September show that the base includes 11 administration buildings and other facilities designed by the late Paul R. Williams, once the nation's preeminent African American architect, who also created the spidery tower that is the signature of Los Angeles International Airport.

Besides the Williams-designed component of the station, commissioned as "Roosevelt Base" when it was rushed to completion in the wake of the Dec. 7, 1941, attack on Pearl Harbor, the Naval Station was the site of a flurry of new construction in the 1980s defense buildup. According to Navy records, the military spent \$38 million to build the newest structures—a 10-story, 360-room barracks complete with sun decks, lounges and a Jacuzzi, a smaller barracks and a medical clinic—within the last seven years alone.

Demolition opponents say countless uses exist for the property.

In Long Beach, where the four-year-old Police

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APPLICATION NO.
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California Coastal Commission

But critics such as Mel Nutter, an attorney and former California Coastal Commission chairman, say the port's analysis of the tidelands law is "an excuse" to rule out other land uses. Nutter insisted that the law is broad enough to include a range of recreational activities.

"I would suspect it's going to take an awful lot to convince the federal government to come along and reject a plan submitted by elected officials," said Bryant Monroe, the civilian project manager overseeing Long Beach's base closures for the Pentagon's Office of Economic Adjustment. "We're not going to split the baby."

At this point, the opposition groups have no formal proposal for what to do with the facilities. They simply want to delay any decision long enough to develop a plan.

And the clock is ticking. The last Navy personnel are scheduled to leave at the end of this month. On Tuesday, the port commission approved its environmental impact study. The Pentagon is conducting an additional environmental analysis and is expected to rule soon on the city's plan. Bulldozers could begin leveling the base in October.

But the timetable could be delayed. California Earth Corps, an environmental organization, has filed a claim against the Navy—and may seek a court injunction to delay demolition—for what it claims is a failure to properly assess possible contamination of the property from toxic chemicals.

The City Council first voted in 1993 to transfer title of the land to the port. After the Navy announced in 1995 that it would close the shipyard next door, city leaders affirmed their earlier decision. But council members said they were not aware of the 54-year-old base's facilities when they voted.

"I never heard anything from any single person about that," said Councilman Alan Lowenthal, whose district includes the area

In Long Beach, where the four-year-old Police Athletics League has drawn 2,200 at-risk children, officers who volunteer to teach martial arts and water sports view the Navy facilities as irreplaceable.

"It's a resource you're not going to get back once it's gone," said Sgt. Steve Fenoglio. "If it's run right, it would have a big impact on the kids."

Officials at the city parks department, which has seen its budget slashed by one-third in the last 10 years, have not sought the property. But they say this city of 440,000 people has worn out many of its existing parks and jammed its three public pools.

Pete Dangermond, a recreation consultant and a former state parks director, said Long Beach is "underserved" with public recreation facilities. Most urban areas aim to have about five acres of parkland for every 1,000 residents, he said. City documents show that Long Beach has about 3.1 acres per 1,000 residents.

The current parks "are not of the size to accommodate the demand that's out there," said Kelton Reese, the manager of community park programs. "I think it's a very important component when you consider quality of life."

EXHIBIT NO. 12

APPLICATION NO.

5-96-182

California Coastal Commission

9-12-96

Alternative to Park on Naval Base Offered

■ **Harbor: Long Beach** promises to build facility elsewhere as current site is turned into cargo yard.

By JEFF LEEDS
TIMES STAFF WRITER

Faced with a widespread public outcry over plans to demolish recreational facilities at the Long Beach Naval Station to make room for a cargo container yard, city officials agreed Wednesday to pay \$2 million to start building a 13-acre park nearby.

"Because we are taking potentially usable recreational facilities away from our community, we are willing to mitigate their loss by replacing them with similar facilities elsewhere in the city," said Harbor Commission President George Murchison. Port officials said they did not hire a consultant to examine the facilities, but decided that \$2 million was a "reasonable" amount to pay.

The announcement did little to appease many opponents of the demolition, who say the 170-acre base, which includes a 25-meter pool and four lighted softball diamonds, would serve the city's children better than its bustling port.

"They're going to spend \$2 million to rebuild a fraction of what's already there," said Huell Howser, the host of KCET-TV's "Visiting" program, who has become an advocate for saving the facilities. "I don't get it."

More than 1,500 people streamed into the city's Convention Center theater Wednesday night to voice their disapproval of the demolition at a hearing before Navy, state and city officials.

"We should hang our heads in shame as Long Beach turns its back on the proud past that is connected with the

Please see NAVY, B6

NAVY

Continued from B1
Navy station," said Joanne O'Byrne, president of a local civic organization and a retired school-teacher.

City officials had planned to use the land as a salve on their economic wounds after losing tens of thousands of military and civilian jobs to defense industry layoffs since 1991.

"We were in the depths of the worst recession in history," said Long Beach City Manager James C. Hankla in describing how the city decided to use the land. "Jobs were king then. I'm not sure they're not king now."

Last year, the City Council approved a plan to transfer its new waterfront real estate to the Port of Long Beach, which intends to lease it to China Ocean Shipping Co., a steamship line run by the Chinese government, and build a \$200-million cargo terminal on 130 acres of the property. A relatively small piece of the base has been given to a satellite-launching firm.

In recent weeks, however, a coalition of preservationists and park users has proffered a cornucopia of alternate uses for the recreational facilities, the historic structures that were designed in part by renowned black architect Paul R. Williams, and other buildings built in the last eight years. They said the base could serve as a camp for at-risk children, a high school or college campus, a museum or a marine training center.

Others have cited everything from nostalgia for the 54-year-old base to resentment of China as reasons for preserving the site.

But city officials insist that the base, which is three miles from downtown Long Beach across the Gerald Desmond Bridge, is too isolated to be of any use as a public park or tourist destination. They also note that opponents of demolition have not said how they would pay to keep up the facilities or provide new programs there. If the city wanted to keep the base as is, city officials estimated Wednesday, asbestos removal and other cleanup work would cost \$15 mil-

lion, and maintenance of the buildings would cost \$1.9 million a year.

According to city projections, construction of the cargo terminal would create 600 jobs on the site, mostly for union longshoremen, 60,000 indirect jobs in shipping and other fields, and more than \$150 million in federal, state and local tax revenue.

Opponents, including an organization called Save the Park by Sharing the Facts, have cast doubt on the city's figures, saying its economic models are too optimistic.

If the city does not pave the land, it risks losing the business of China Ocean Shipping Co., a tenant at the port for 15 years and one of the world's largest steamship lines, port officials said. The company, owned by the government of the People's Republic of China, has threatened to build its new terminal at one of the Long Beach port's competitors—the adjacent Los Angeles harbor, Oakland or Seattle—if the deal collapses, said S.R. Dillenbeck, executive director of the Long Beach port.

Mayor Beverly O'Neill said that if the city agreed to reconsider its land reuse plan, which has been approved by the City Council and forwarded to the Navy, it would have to "start over" and compete with state and federal agencies to regain possession of the property. O'Neill said that would raise the possibility that a homeless services organization or the federal Department of Corrections would build on the site.

The \$2 million pledged by the city Wednesday would come from port revenue, not tax dollars, and would help pay for irrigation of a park site purchased by the city two years ago, Murchison said. Sandwiched between the concrete banks of the Los Angeles River and Golden Avenue, the park would offer two soccer fields, a multipurpose diamond and other facilities. Its total cost is estimated at \$8.5 million, said Councilwoman Jenny Oropeza, who represents the area.

"Obviously, \$2 million will not foot the bill," Oropeza said. But "this will put us on a fast track."

EXHIBIT NO. 13

APPLICATION NO.

5-96-182

West Coast Naval Base Belatedly Stirs Passions

Residents Object to Plan to Pave Site Over

By JAMES STERNGOLD

LONG BEACH, Calif., Sept. 12 — This past Wednesday, Patricia Fink went through a routine she had followed for four years, locking the door of her office on the elegant, campus-like naval base here, initialing a form against the back of a sailor who had been waiting in the breezeway, then walking toward her car for the ride home.

The only difference was that it was the last time she would make the trip.

Ms. Fink, who first saw the base 13 years ago when her father became its commander, was one of many people taking home little more than memories as the once-thriving Long Beach Naval Station, a mainstay of the local economy for five decades, moved closer to being shut down.

The Department of Defense decided to close it as part of a nationwide cost-cutting program, and the ships that had carried sailors to and from wars around the globe pulled out for good last year.

But what has made the experience particularly melancholy for workers and residents is the proposed fate of the historic, 130-acre naval station: the City of Long Beach has been aggressively pushing a plan to raze every structure on the site, including 11 handsome, International style buildings whose designers included Paul Revere Williams, one of the country's most prominent black architects. The site would be paved for a shipping container terminal.

The decision has come as a shock to many people familiar with the site, an oasis of greenery in the middle of the country's busiest commercial port, and it has blown up into a major civic protest, with some people demanding a recall of the Mayor, Beverly O'Neill.

"Economically, they think it's best for the city, but I think it's a shame," said Capt. Joseph Innes, a dentist in the base clinic whose first posting was at Long Beach and who locked up for the last time today. "This was one of the best-kept secrets in the

Navy. It was a very nice place, I can't believe they can't use it for a little college campus or something."

For several years now, cities around the country have been forced to deal with base closings and their economic repercussions, a combination of lost jobs and, for creative local governments, new opportunities. But few communities have felt the issues as poignantly as Long Beach, a depressed industrial city of 440,000 just south of Los Angeles.

A hearing on the proposed terminal Wednesday drew several thousand people and dragged on until 1 A.M., with many people hooting derisively as Mayor O'Neill described plans to create what she said would be as many as 650 jobs at the site. No matter that the city is suffering an unemployment rate of 8.3 percent, more than three percentage points higher than the rest of the country.

"I've been in this field 20 years, and this is without a doubt the biggest turnout I've ever seen for something like this," said Cheryl Widell, the state's historic preservation officer and part of the effort to determine whether the buildings should be saved as architectural landmarks.

What is striking is that residents here seem suddenly energized by a sense of civic pride rather than raw economic need, even though it is pride in a group of structures that few of them had seen or even known of until a few months ago.

Because the base was always closed to outsiders, "we had no idea what was there; no one let us know," said Peter Devereaux, vice president of Long Beach Heritage, an organization that is trying to rescue the buildings. "We had no time to work on any alternative plans."

In fact, opponents of the terminal concede that they do not have a well-thought-out counterproposal, and at the least are asking for more time.

During California's recent recession, Long Beach was betrayed by what had been the two pillars of its economy. The city lost 30,000 aerospace jobs, and then it was hit with



The Long Beach Naval Station is closed to be leveled for a shipping container terminal.

**Jobs at any cost?
Long Beach, Calif.,
says, "Not
necessarily."**

the devastating news that the Pentagon was closing the Navy base and several other military installations, with a loss of about 27,000 jobs.

The city has placed its hopes on trade. Long Beach harbor is an endless vista of spindly cranes, bulky vessels and stacks of containers, most bearing the names of Chinese, Korean and other Asian companies.

The port, which is adjacent to its competitor, the Port of Los Angeles, handled the equivalent of 2.8 million 20-foot containers last year, trade

EXHIBIT NO. 14
APPLICATION NO.

5-96-182

Report

York Times



Jim Wilson/The New York Times

closing and the plans are for its International style buildings, whose architects included Paul Revere Williams, for a new terminal. Workers recently moved furniture from the administration building with an elaborate terrazzo floor.

valued at \$82 billion.

The city's plan is to immediately level everything on the site, not just the Williams buildings, but also the \$50 million worth of structures put up in the last decade, including apartment buildings and a medical center. The more than 100 acres of blacktop would then be leased to the China Ocean Shipping Company, which is owned by the Chinese Government.

The city has said that the company is threatening to move if the additional space is not provided. A company official confirmed that it had been wooed aggressively by the Port of Los Angeles and would take the best deal offered.

"I don't think it's any secret that there's a lot of competition from other ports for these jobs," said Jim Hankla, the city manager. "We don't intend to lose them."

The focus of concern is not the whole naval station, but a 90-acre

portion known as the Roosevelt Base that was rushed to completion in 1942, after the Japanese attack on Pearl Harbor. It contains 11 buildings, among them offices and a huge gymnasium, designed by Mr. Williams and another architect, Adrian Wilson.

The base is still in excellent condition, with trimmed lawns, clipped rosebushes and huge ficus and olive trees. One complaint is that destruction of the base would eliminate the habitat for numerous birds, including herons. Ms. Fink said she had rescued perhaps a hundred baby herons that had fallen from nests.

Mr. Williams, who died in 1980, is well known for many local landmarks, including the Los Angeles County Courthouse, a Jetsons-like structure at the Los Angeles airport and homes for celebrities.

The city has said that it will try to preserve the memory of the base

buildings by producing a documentary film, ordering some drawings and salvaging some artifacts. The audience at the hearing on Wednesday heckled city officials mercilessly when they described the plan.

The Long Beach port commission, which is proposing to build the new terminal, has made its own peace offering. It said it would donate \$2 million toward construction of soccer fields near downtown to make up for the destruction of the recreational offerings at the base, which some residents had proposed turning into a public park. At the hearing, protesters shouted "payoff!" when the offer was mentioned.

"People are looking at the price they are being asked to pay for those jobs, and they think it's too high," Mr. Devereaux said. "People want to be proud of their community, you know."

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APPLICATION NO.

5-96-182

