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January 28, 2009

Dr. Ralph Appy  
Director of Environmental Management  
Los Angeles Harbor Department  
425 South Palos Verdes Street  
San Pedro, CA 90731

**Re: DEIS/DEIR for the Wilmington Waterfront Development Project (ADP#050927-164)**

Dear Mr. Appy:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS)/Draft Environmental Impact Report (DEIR) for the Wilmington Waterfront Development Project. One of the main objectives of the coordination between POLA and DCP has been to ensure a consistent and cohesive connection between the waterfront and adjacent community. This is an important project for the Port of Los Angeles and the Wilmington Community and holds much promise for continuing positive changes along the waterfront. The Department of City Planning (DCP) submits a few suggested clarifications for your consideration.

Clarifications/Comments

1. **Executive Summary:** Page ES-2, lines 7-13, Avalon Development District (Areas A and B) is written as a combined list of proposed project elements for both Areas A and B. The proposed project elements should be separated to correspond with either Area A or B to clarify their location and boundary.
2. Page ES-5, lines 1-27, Proposed Planning/Land Use Changes, as part of the proposed General Plan Amendment to downgrade Avalon Boulevard between A Street and Water Street from a Collector Street to a Local Street, the street vacation is not listed and should be listed as part of the proposed action. In an effort to maintain consistency throughout the document the street vacation should be discussed in concert with the General Plan Amendment (street downgrade) and be included among all the requested entitlements.
3. Page ES-8, Proposed Project Setting, lines 37-38, Surrounding Uses, states "while the proposed project site lies partially within the Wilmington-Harbor City Community Plan...", a more accurate description would state that most of the proposed project lies within the existing boundary of the Wilmington-Harbor City Community Plan.

4. Page ES-10, line 1, Surrounding Uses, states "the nearest residential area is within 5 miles of the proposed project." A more accurate description would state the nearest residential area including both single- family and multiple-family is within 1 mile of the proposed project.
5. Page ES-12, lines 22-24, Proposed Project Elements, change language to read: "jurisdictional boundary adjustments are proposed (instead of required) for the Port Element of the City's General Plan, Wilmington Harbor-City Community Plan (WHC CP), and the Port Master Plan," since the jurisdictional boundary adjustments are not technically required for the proposed project to proceed.
6. Page ES-13, Table ES-1: Elements of the Proposed Project, indicates that the Avalon Development District [Area A] is proposing the construction and operation of a maximum of 75,000 square feet of light industrial development (oriented toward green technology businesses) in Phase I (2009-2015). However, DCP is scheduled to begin the New Community Plan Program for Wilmington-Harbor City in late 2009, we have asked that language be modified to reflect the uncertainty of changes to land use patterns in Avalon Development District Area A, as a result of the comprehensive analysis from the new community plan process. To maintain consistency, Area A Phase I should have similar language to Area A Phase II, which says "Potentially construct and operate...," when referring to the 75,000 sf of light industrial development (oriented toward green technology businesses). In prior discussions, DCP and the Port agreed to the language used in the Land Use section, page 3.8-38, lines 13-15, which says "The proposed project could include the development of this area north of Harry Bridges Boulevard (Area A) with up to 150,000 square feet of light industrial uses as currently zoned in Area A."
7. The Introduction, Project Description, and Land Use sections use the same language and tables for the above comments and should be clarified throughout the document.

Sincerely,



Betsy Weisman  
Principal Planner, West Coastal Division  
Department of City Planning

BW:jp:ma

Cc: Dave Mathewson: Jan Green Rebstock