

From: [GreenRebstock, Jan](#)
To: [Chad Beckstrom; Rachel Struglia;](#)
Subject: FW: Waterfront DEIR - DCP comments
Date: Tuesday, December 09, 2008 9:54:04 AM
Attachments: [Pola DEIR DCP comments 12.8.08.pdf](#)

From: Conni Pallini [mailto:Conni.Pallini-Tipton@lacity.org]
Sent: Monday, December 08, 2008 5:36 PM
To: GreenRebstock, Jan; Cham, Michael
Subject: Waterfront DEIR - DCP comments

Hi Jan and Michael,
wanted to send along a copy of the comments DCP submitted on the Waterfront EIR. Feel free to give me a call if you have any questions. Thought you all did a great job on a really complicated project.

Conni

Conni Pallini-Tipton, AICP
Department of City Planning
City of Los Angeles
213.978.1196 | 213.978.1226 fax
conni.pallini-tipton@lacity.org

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
AND
6262 VAN NUYS BLVD., SUITE 351
VAN NUYS, CA 91401

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EVA YUAN-MCDANIEL
DEPUTY DIRECTOR
(213) 978-1273

FAX: (213) 978-1275

INFORMATION
(213) 978-1270

www.planning.lacity.org

December 8, 2008

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 San Pedro Waterfront Project (ADP#041122-208)

Dear Mr. Appy:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS)/Draft Environmental Impact Report (DEIR) for the San Pedro Waterfront Project. This is an important project for the Port of Los Angeles and the San Pedro Community and holds much promise for continuing positive changes along the waterfront. The Department of City Planning (DCP) submits a few clarifications your consideration.

Clarifications/Comments

1. **Project Description:** Page 2-3, Project Site and Surrounding Uses does not include a description of the residential uses directly west of the project site from Swinford to 22nd Streets, and similarly excludes mention of the Downtown San Pedro commercial and business district. It is necessary to include these in the description of surrounding uses for context in the analysis of impacts to surrounding residents and businesses. Aesthetics, Land Use and Planning, and Socioeconomic and Environmental Quality sections should included analysis of potential impacts to these uses.
2. Page 2-39, lines 30-33, indicates "landscaping and hardscape improvements are proposed along the east side and west side of Harbor Boulevards south of 7th Street, as well as in the median of Harbor Boulevard starting at the Swinford Street intersection, and would extend south to 22nd Street." Alternative 1 on Page 2-48 describes the transportation improvements on both sides of Harbor to be the same as for the proposed project, yet describes the landscaping and hardscape improvements as "starting at the Swinford Street intersection, south to 22nd Street." The project description should be corrected to reflect the improvements as described in Alternative 1, which is the preference of the Harbor Boulevard Seamless Study and parties involved in the study.

3. Improvements are planned for both sides of Harbor Boulevard, which are subject to both the San Pedro Community Plan and the Port of Los Angeles Plan. Coordination of the Harbor Seam has been ongoing and as such it should be stated clearly that design improvements will be developed and approved by several City Departments, including but not limited to DCP and the CRA/LA.
4. **Land Use and Planning:** Page 3.8-1, lines 18-21, states “the entire project site is contained within the Port of Los Angeles Plan area”. (Page 7-70 lines 30-34 and Page 7-31 lines 7-11 similarly mischaracterize the project area.) As reflected in both the San Pedro Community Plan Land Use map and the Port of Los Angeles Plan map a more accurate description would state that the project includes components that are located within the San Pedro Community Plan area: the west side of Harbor Boulevard from Swinford to 22nd Street; and along both sides of Harbor Boulevard between 3rd and 7th Streets (see Figure 1 attached). This area in particular is designated Open Space and Light Manufacturing and zoned OS-1 and [Q]M-2. Project improvements may require plan amendments or zone changes for the San Pedro Community Plan area.
 - a. Additionally mitigation measures (TC-6-9, 12, 13) are proposed along Gaffey, Miner, and 22nd Streets, which are all wholly within the San Pedro Community Plan. All mitigation measures affecting Harbor, Gaffey, Miner and 22nd Streets need to be consistent with Community plan street designations and/or require amendments. Such changes must be coordinated with DCP and LADOT.
 - b. The project description should include figures depicting the San Pedro Community Plan land use designations and zoning categories.
5. Impact LU-3, lines 18-23 on Page 3.8-27, the discussion of impacts describes the project as resulting in “less impact to the community than was originally planned”, this statement may be confusing as to what is being analyzed; this section could be revised to discuss the current project only. It further describes that Harbor Boulevard will be maintained as 2 lanes in each direction. However the mitigation measures to minimize the impact of this project component reconfigures Harbor Boulevard to 3 lanes from Swinford Avenue to 5th Street. The statement of impact is unclear. Physical connectivity between the waterfront and the community is of vital importance. If Harbor Boulevard is ultimately to be 3 lanes in each direction, design must deter high speeds and ensure pedestrian safety. Mitigation measures should be included in the EIR/EIS to address design, aesthetics, and pedestrian and bicycle safety.
 - a. Mitigation measures must also address potential relocation of the existing bicycle lanes on Harbor Boulevard and ensure that state standards of bicycle facilities are retained or improved.
6. Table 3.8-2, on Page 7 of 10, the Consistency Analysis for the San Pedro Coastal Specific Plan Purpose 8 states that “building heights have been limited (to 2 stories) to maintain view corridors consistent with the street grid pattern (i.e. World Cruise Center parking structures, SP Railyard bluff parking structures).” Parking structures are described as 4 story structures in other locations. The traffic study dated May 8, 2008 describes the structures as “2 story (3 level structures)”. View corridors are a very important asset to maintain between the Port Plan Area and the San Pedro Community Plan. Smaller, lower and stepped back structures are preferred to 4 story structures. The description of the project and the analysis of the impacts should be consistent throughout the document.

7. Table 3.8-2, on Page 7 of 10, the Consistency Analysis for SCAG 3.03 states the Project is not considered a growth inducing land use because it would not cause a significant increase employment" [sic]. The project anticipates more than doubling the existing square feet of commercial uses and adding a conference center. Employment generation is generally viewed upon favorably, however, this project must adequately address and plan for potential impacts, specifically traffic and trips generated by new employees.
8. **Aesthetics.** Page 3.1-11 lines 34-38, should be corrected to reflect the last San Pedro Community Plan Update was completed on March 17, 1999. Also the impacts discussion of the proposed inner harbor parking structures should state that DCP and CRA/LA will be involved in the design and approval to incorporate landscape features, architecture and building materials, and structure lighting to minimize aesthetic impacts to the community.
9. **Socioeconomics and Environmental Quality.** The proposed project includes up to 375,000 square feet of commercial and conference center uses at Ports O'Call. Prior to a Request for Qualifications for a developer for Ports O'Call being issued, a market study for the entire Ports O'Call and Downtown San Pedro should be done to address the economic viability of this development in relation to the existing business district. A mutual goal of both the Waterfront Project and San Pedro Community Plan is to promote commercial districts that complement and support the uses within each.

Other Considerations

One of the main objectives of the coordination between POLA, DCP and the CRA/LA has been to ensure a consistent and cohesive connection between the waterfront and adjacent community. An additional component that should be included in the project description and analysis is the trolley extension through Downtown San Pedro. A loop extension has been proposed as a result of the Harbor Seam Study that would travel from Harbor Boulevard west to 5th, south on Pacific and east on 7th Street. This component should be included or proposed for another phase of development of the Waterfront Project.

No mention of short term guest slips are made in the project description for improvements adjacent to Ports O'Call or Town Plaza. The proposed project should include planned guest slips for waterborne visitors from other marinas and neighboring harbors so that access to Ports O'Call and Downtown San Pedro is available.

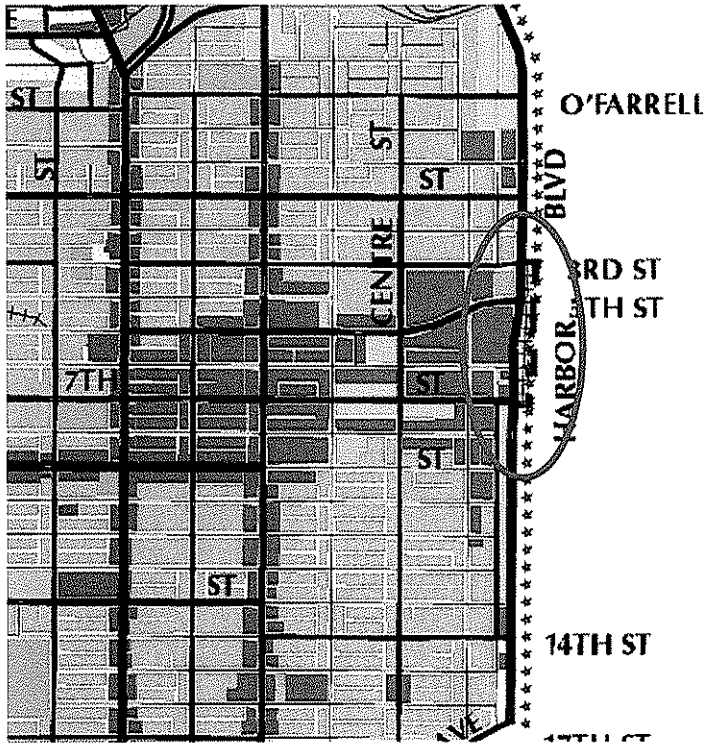
Sincerely,



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

BW:cpt

Figure 1 Project Components within the San Pedro Community Plan Area



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ZIMAS - Zoning Information and Map Access...

RESULTS

PROPERTY INFORMATION

DATA TABS: Planning and Zoning Information

Item Name	Value
Special Notes	None
Zoning	OS-1
Zoning Information (ZI)	ZI-646 Beacon Street Redevelopment Project
Zoning Information (ZI)	ZI-2139 Harbor State Enterprise Zone
General Plan Land Use	Open Space
Plan Footnote - Site Req.	See Plan Footnote
Additional Plan Footnotes	View San Pedro Footnote
Specific Plan Area	None
Historic Preservation Review	Yes
POD - Pedestrian Oriented Districts	None
CDO - Community Design Overlay	None
HIS - Neighborhood Stabilization Overlay	No
Streetscape	No
Sign District	No