Group 5 Organizations

1. South Coast Interfaith Council
2. South Coast Interfaith Council
3. Grand Vision Foundation
4. Los Angeles Maritime Institute
5. Port Community Advisory Committee Air Quality Subcommittee
6. Pacific Harbor Line
7. Wilson Meany Sullivan
8. Lomita Chamber of Commerce
9. Port Community Advisory Committee Light, Aesthetics, and Noise Subcommittee
10. Princess Cruises
11. LA INC The Visitors and Convention Bureau
12. U.S. Merchant Marine Veterans World War II
Dr. Ralph G. Appy
Director of Environmental Management
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731

Re: San Pedro Waterfront Project

Dear Dr. Appy:

The South Coast Interfaith Council, www.scinterfaith.org, is attentive to the well-being and quality of life of people within its constituency, roughly in the southern part of Los Angeles County. SCIC’s Social Concerns Committee commends the port for its support of the Bridge to Breakwater Master Development Plan and its related projects. The San Pedro Waterfront Project is especially significant as an effort to enhance the lives of local residents and to draw visitors from throughout California and far beyond. San Pedro is a naturally scenic and rejuvenating area with a rich cultural heritage.

We urge that careful attention be given to alternative plans that have been put forth and that the final Environmental Impact Report/Statement go beyond merely giving written responses and actually incorporate the best and most thoughtful recommendations. This may require one or more special public workshops or study sessions. We are especially impressed with the professional quality and sensitivity to community and environmental concerns of the Sustainable Waterfront Plan.

We urge that every effort be made to ensure that the Waterfront Project add to the social cohesion of the San Pedro community, especially for its poorer residents. In this regard it is important to not mar the view from Cabrillo Beach by siting a cruise ship terminal at Kaiser Point and to not over-gentrify Ports O’Call Village. Social cohesion and a spirit of community would also be enhanced by a pedestrian thoroughfare and land bridge from downtown to Ports O’Call and by Red Car service from downtown to the waterfront.

Climate change is a challenge to which attention must be given. Accordingly, it is vitally important that the Waterfront Project encourage walking and bicycling as modes of getting from place to place and as forms of recreation.
We endorse the Sustainable Waterfront Plan's recommendation to enhance links to existing open space, specifically Leland Park, Peck Park, Bandini Canyon, Royal Palm Beach, White Point, Point Fermin, Sunken city, Angels Gate Park, Cabrillo Beach and the Harbor View Trail. Greenhouse gas emissions can be reduced by locating all berths, particularly cruise ship berths, at the inner harbor, thus reducing distances large numbers of cars, buses, and trucks must travel and relieving congestion.

It is of course essential that the ports of Los Angeles and Long Beach follow through with their Clean Air Action Plan. We applaud you for your progressive Clean Trucks Program and hope that similarly inspired programs can be instituted to give special protection to school children and the elderly.

This letter is also being sent by e-mail with attachments related to the Sustainable Waterfront Plan.

Cordially,

Carl Farrington
Chair, Social Concerns Committee
From: Carl Farrington  
To: Ceqacommits;  
Subject: San Pedro Waterfront Project  
Date: Friday, December 05, 2008 9:14:34 PM  
Attachments: SustainableWaterfrontPlan.pdf  
Goals of community Isabelle100808-1-1.doc

---

South Coast Interfaith Council  
759 Linden Avenue  
Long Beach, CA 90813  
scic@charterinternet.com  
December 5, 2008

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

Re: San Pedro Waterfront Project

Dear Dr. Appy:

The South Coast Interfaith Council, www.scinterfaith.org, is attentive to the well-being and quality of life of people within its constituency, roughly in the southern part of Los Angeles County. SCIC’s Social Concerns Committee commends the port for its support of the Bridge to Breakwater Master Development Plan and its related projects. The San Pedro Waterfront Project is especially significant as an effort to enhance the lives of local residents and to draw visitors from throughout California and far beyond. San Pedro is a naturally scenic and rejuvenating area with a rich cultural heritage.

We urge that careful attention be given to alternative plans that have been put forth and that the final Environmental Impact Report/Statement go beyond merely giving written responses and actually incorporate the best and most thoughtful recommendations. This may require one or more special public workshops or study sessions. We are especially impressed with the professional quality and sensitivity to community and environmental concerns of the Sustainable Waterfront Plan.

We urge that every effort be made to ensure that the Waterfront Project add to the
social cohesion of the San Pedro community, especially for its poorer residents. In this regard it is important to not mar the view from Cabrillo Beach by siting a cruise ship terminal at Kaiser Point and to not over-gentrify Ports O Call Village. Social cohesion and a spirit of community would also be enhanced by a pedestrian thoroughfare and land bridge from downtown to Ports O Call and by Red Car service from downtown to the waterfront.

Climate change is a challenge to which attention must be given. Accordingly, it is vitally important that the Waterfront Project encourage walking and bicycling as modes of getting from place to place and as forms of recreation. We endorse the Sustainable Waterfront Plan’s recommendation to enhance links to existing open space, specifically Leland Park, Peck Park, Bandini Canyon, Royal Palm Beach, White Point, Point Fermin, Sunken city, Angels Gate Park, Cabrillo Beach and the Harbor View Trail. Greenhouse gas emissions can be reduced by locating all berths, particularly cruise ship berths, at the inner harbor, thus reducing distances large numbers of cars, buses, and trucks must travel and relieving congestion.

It is of course essential that the ports of Los Angeles and Long Beach follow through with their Clean Air Action Plan. We applaud you for your progressive Clean Trucks Program and hope that similarly inspired programs can be instituted to give special protection to school children and the elderly.

This letter is also being sent by U.S. mail without attachments related to the Sustainable Waterfront Plan.

Cordially,

Carl Farrington
Chair, Social Concerns Committee
San Pedro
Sustainable Waterfront Plan
Goals of the Community of San Pedro

1. All berths to be located at the inner harbor.
2. Provide linkages to downtown and community.
3. Provide links to and protection of existing open space.
4. Expand salt water marsh habitat.
5. Ports O Call - Develop/enhance 150,000 SF of commercial space, a conference center, open space and a promenade in POC.
6. Create diversity of parking options to discourage traffic/pollution and encourage pedestrian activity downtown.
7. Create a plan that reflects the Port's sustainability goals.
1. All berths to be located at the inner harbor.
2. Provide linkages to downtown and community.

Create pedestrian links to downtown.

Run Red Car from waterfront to downtown.
Build land bridges between downtown and Ports O Call.

Create pedestrian oriented design.
3. Provide links to and protection of existing open space.

Incorporate California Coastal Trail.
Enhance links to existing open space.
4. Expand salt water marsh habitat.
5. Ports O Call - Develop/enhance 150,000 SF of commercial space, a conference center, open space and a promenade in POC.

Commit to "commons" area between shops.
Do not widen Harbor Blvd. Maintain scenic designation.
6. Create diversity of parking options to discourage traffic/pollution and encourage pedestrian activity downtown.
Create sustainable shared parking for downtown and waterfront.
7. Create a plan that reflects the Port’s sustainability goals.

- Provide bicycle friendly streets.
- Reduce heat island effect.
Integrate solar. Integrate green site planning. Integrate green street infrastructure.
Plan for the entire waterfront.
1. All berths to be located at the inner harbor.
   a. Set aside Cabrillo Beach/Outer Harbor area for recreational/educational uses that preclude cruise service.
   b. Maintain all berths as shared berths, with no terminals dedicated to one vender.
   c. Create some agreement that a limited temporary berth at existing Kaiser Point location may continue with restrictions.
   d. No new terminal or parking at Berth 46.

2. Provide linkages to downtown and community.
   a. Create pedestrian-oriented design, from bridge to breakwater and to downtown.
   b. Incorporate/enhance regional transportation, such as express and Amtrak buses to L.A., L.B., Wilmington and other regional destinations, in order to reduce car trips to waterfront, beaches and off-site parking areas.
   c. Run the Red Car line extensively all along the waterfront with stops from Cabrillo Beach to Dock One, to Kaiser Point, to the north harbor cruise ship terminal and through downtown.
   d. Build land bridges between downtown and Ports of Call, including roof gardens and pedestrian walkways on the parking structures and east-west connecting walkways.
   e. Create pedestrian links to downtown, both physical and economic, to provide access to the water and POC.
   f. Maintain the scenic 2-way designation of Harbor Boulevard, preserving views and view corridors. Maintain four-lane access.

3. Provide links to and protection of existing open space.
   a. Enhance link to Bandini Canyon, Leland Park and Peck Park.
   b. Incorporate links to Harbor View Trail.
   c. Incorporate/complete California Coastal Trail through San Pedro Waterfront, including pedestrians, jogging, skating & bicyclists lanes.
   d. Enhance Coastal Trail links to Royal Palm Beach, White Point nature Conservancy, Angles Gates and Point Fermin Park.
   e. Create a promenade from the Bridge to the Breakwater along the waterfront.
   f. Create a second pedestrian walkway on the landside of Ports of Call.
   g. Create an Outer Harbor Park along the east edge of Kaiser Point.

4. Expand salt water marsh habitat.
   a. Expand by 10 acres the tidal pool and salt marsh at Salinas de San Pedro.

5. Plan/Develop Ports O Call
   a. Develop/enhance 150,000 SF of commercial space, a conference center, open space and a promenade in POC.
   b. Commit to extensive "commons" area between shops.

6. Create diversity of parking options
   a. Encourage pedestrian activity downtown, discourage traffic/pollution.
   b. Create shared parking facilities for downtown & waterfront.
   c. Minimize parking and roadways in tidelands, waterfront and beach areas.
   d. Create off-site parking, not just in downtown, but possibly between San Pedro & Wilmington for full day and longer use.
   e. Move parking, especially long-term parking, away from the waterfront by under-grounding day-trip visitor parking along Harbor Boulevard, and building parking structures for cruise ship passengers along John S. Gibson Boulevard and on Terminal Island.
   f. Create no parking structures on the waterfront that block view corridors.

7. Create a plan that reflects the Port's sustainability goals.
   a. Require amping of all cruise ships.
   b. Plan the entire waterfront, including Westways, Warehouse One, Fruit Terminal and Boy Scout Camp.
   d. Incorporate sustainable infrastructure and development such as green streets, bicycle streets, urban runoff treatment, constructed wetlands and LEED buildings.
   e. Create a waterfront business plan to describe the economic development goals, determine the mix of commercial, retail and educational/cultural uses development and enhance downtown businesses.
   f. Create a steering committee comprised of a variety of business, neighborhood and environmental stakeholders to meet with the port and their designated planning consultant.
San Pedro Waterfront Sustainability Plan

Broad Goals of the Community of San Pedro

October 2008 Presentation

PCAC Subcommittee

To develop a consensus project that reflects community, chamber, environmental and business agreement while supporting the sustainable development goals of the council district and the Port. This consensus plan would minimize opposition allowing for expedited project review, approval and construction.

1. All berths to be located at the inner harbor.
2. Provide linkages to downtown and community.
3. Provide links to and protection of existing open space.
4. Expand salt water marsh habitat.
5. Plan/Develop Ports O Call
6. Create diversity of parking options to discourage traffic/pollution and encourage pedestrian activity downtown.
7. Create a plan that reflects the Port's sustainability goals.
December 7, 2008

Dr. Spencer D. MacNeil
U.S. Army Corps of Engineers, Los Angeles District
Regulatory Division, Ventura Field Office
2151 Alessandro Drive, Suite 110
Ventura, California 93001

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

Subject: 2008 Waterfront Project Draft EIS/EIR

Dear Dr. MacNeil and Dr. Appy:

The Grand Vision Foundation (GVF) is a non-profit community and civic organization whose mission is to preserve and promote the Warner Grand Theatre, an historical landmark listed on the National Register of Historic Places. Since its inception in 1995, GVF has been guided by the goal of energizing downtown San Pedro (Downtown) through a revival of arts and culture. In 1996, the then-closed and derelict Theatre was purchased by the City of Los Angeles for the expressed purpose of enhancing tourism and revitalization in Downtown. GVF’s main accomplishments have been to restore the Theatre’s marquee, neon blade sign, seats, stage rigging, technical equipment and more. Due to these efforts, the Theatre is now regularly programmed and open to the public.

GVF recommends a preservationist approach to waterfront development which builds on existing assets. San Pedro’s waterfront development should incorporate Downtown’s rich fabric of historic buildings, view corridors and street grid at every opportunity.

The proposed project does not contribute to a revitalized Downtown commercial and entertainment district and, instead, curiously, passes downtown by. This is in direct opposition to the original intent of waterfront development — which was to revitalize Downtown. GVF contends that the lack of an economic impact study of the effects of the proposed project on Downtown renders the EIR incomplete.

GVF agrees with the position of the San Pedro Chamber of Commerce, the Pacific Corridor Community Advisory Committee and the Central San Pedro Neighborhood Council in opposing the Proposed Project. Like these groups, our priority is for all improvements to be completed adjacent to Downtown first. Specific issues of concern are raised in Attachment #1.

We support Alternative Development Scenario 4, with the following modifications:

1) Shared Parking West of Harbor. We support linking the waterfront with downtown San Pedro by providing parking structures at one or more of the parking opportunity sites recommended by the City of Los Angeles CRA study authored by SMVM in 2006. It is our belief that the optimal site would be at a corner of 6th St. and Pacific Avenue, which was identified by the CRA in 2006 as the "portal" to historic Downtown. This would maximize visitors' exposure to the full length of the historic district. Please seek precedents where waterfront development extends beyond Port-controlled properties.
2) San Pedro should be linked to the waterfront by the extension of the red car line, or some other attractive and consistent people mover, to encourage a seamless connection between activities at the waterfront and in Downtown. This transportation hub should remain at 6th Street, and the route should incorporate 5th Street, Pacific Avenue and 7th Streets.

3) The historic street connection from 6th Street to the Ferry Building and Ports of Call Village should be maintained. A pedestrian walkway should be created next to both sides of 6th Street between Harbor Blvd and Sampson Way. This is a key linkage to downtown San Pedro and maintains our urban street grid. While GVF supports the new street access to Sampson Way from 7th Street, the proposed new intersection at 7th Street and Harbor Blvd to Sampson is unwieldy, dangerous and difficult to access to and from the Maritime Museum, Acapulco Restaurant and the Ports of Call Village. Instead, we support a traditional 90-degree intersection.

4) Preserve, restore, improve and celebrate the waterfront’s historic assets, including Ports of Call Village and the Fish Market, which, like the Warner Grand Theatre, are a source of community pride and collective nostalgia. Explain why the proposed project preserves Acapulco Restaurant and demolishes Ports of Call Village, and what criteria were used to make this decision.

5) Plaza and park development, especially the proposed “town square” at the Maritime Museum, needs further research and design; a plaza of such large scale is cause for concern. This is a critical location as it is both the entrance to the waterfront and the exit to Downtown. It is where the “seam” must become “seamless”, despite the presence of a railroad track.

The proposed “town square” is large and without flow or focus. It risks becoming a no-man’s land. According to current urban design thinking, successful plazas are activated by a sense of procession through different stages of space, with visual and physical focal points. Successful plazas are also scaled to size that give users a sense of security and comfort, while presenting vistas that hold the visitor’s attention.

We suggest developing two parks on either side of 6th Street (which we recommend preserving) as it continues from Harbor Blvd to Sampson Way. On the north side, extend the John S. Gibson Park to the current temporary LAMI site to incorporate and celebrate San Pedro’s historical monuments. Integrate the existing park with whatever new plaza area is added instead of surrounding the park with landscaping. On the south side, with Harbor Blvd (or the railroad tracks) to the west and Sampson Way to the east, a new park/plaza space should focus on a contemporary water feature, landscaping, art, and street furniture. This space could also serve to shield pedestrians from traffic movement to the south.

We urge the Mayor, Port of Los Angeles Harbor Commissioners and staff to implement our comments and recommendations. The waterfront redevelopment project should stay true to its original purpose of revitalizing Downtown and capitalizing on existing strengths. Instead, the proposed project seeks to fundamentally alter our street grid and change the historic flow from west-east to north-south. It emphasizes separation and barriers rather than a “seamless interface.” A successful project must go beyond artificial government zones in order to serve and enhance the community or it will become an underutilized through-way to a new cruise terminal.

Sincerely,

[Signature]

Liz Schindler Johnson
President & Executive Director
Grand Vision Foundation
SAN PEDRO WATERFRONT PROJECT

Draft Environmental Impact Statement/Environmental Impact (DEIS) Report

DEIS report notes that "(t) throughout history, the community of San Pedro and the Port have been closely linked and mutually interdependent. However the physical connection between the downtown San Pedro and the waterfront is lacking due to a number of visual and physical barriers that inhabit access to the water's edge." (see page ES -13). The DIES proposed improvement are designed to meet three purposes:

(1) Redevelop the San Pedro Waterfront area for increased public access and to provide connections between the waterfront area and the San Pedro community. As noted in the report “the State Lands Commission and the Public Trust Doctrine place responsibility on the Port that emphasizes public access.” (page ES-13).

(2) Reinforce the existing weak connections between Downtown and Ports O'Call so that the two can perform to their potential. (see page ES-13 para #3).

(3) Provide for the cruise industry growth in passenger volume for the next two decades by improving the Harbor Channel Waterway and landside infrastructure to serve the new larger ships.

The proposed projects include: (see table ES-2, page ES 16)

(1) Cruise berths expansion and additions, from existing two 1000 linear foot and one occasional 3rd berth to four permanent berths (three 1,250 feet linear feet and one 1,000 foot linear berths), Construction of two new 100,000 square feet terminals in Outer Harbor, increasing the parking for cruise ships from existing 3,560 to 6,000, creating new three (about 7-acre area) water cuts (for tug boats and other existing vessels) to improve navigation on Harbor Channel.

(2) Promenade and open space projects include the 30-foot wide promenade along the western edge of Harbor Channel, three parks (3-acre within Ports O'Call – location not specified, 6-acre park in Outer Harbor and one 18-acre “Central Park”, Pedestrian crossings at 8 locations and vehicular access at 6 locations across Harbor Boulevard between 1st and 22nd Street, and other public works projects including interactive water feature near 7th Street.

(3) Ports O'Call redevelopment projects includes addition of 150,000 square feet new development, 976 surface parking spaces dedicated to Pots O'Call and Downtown Harbor, removal of rail yard adjacent to bluff site near Port O'Call and construction of a four level parking structure with 1,652 parking spaces on the site. Also proposed are three new structures of 10,000 square feet each to house two boat display offices and tug boat offices, construction of a 17,600 Rail maintenance facility and other similar public works projects described in summary on table ES-2.

(4) Transportation improvements proposed include a street widening, Sampson Way between 7th and 22nd Street from the existing two lane to a four lane street, modification of Harbor Boulevard and 6th street intersection, "eliminating access to Sampson Way from Harbor Boulevard at 6th Street", landscape improvement to Harbor Boulevard on west side, a new 152-parking surface lot to serve 7th Street Harbor and adjacent area and waterfront, red car extension to Cabrillo Beach and Outer Harbor.

Reading the project descriptions as provided in EIR Executive Summary (Figure ES-4 and Table ES-2 and the EIS report Land Use and Transportation Sections) it seems that the waterfront development focus is on one of the three stated project purposes, i.e., the cruise industry growth. The cruise operations estimated growth over a twenty year period is 100 %, from a 1,150,548 passengers in 2006 to 2,257,335 passengers in 2037 (table ES-4 page ES-28).
It is not clear how the two other two stated purposes, namely providing increased public access and connections between the waterfront area and the San Pedro and reinforcing the existing weak connections between Downtown and Ports O'Call are addressed. Based on the outlined mitigation monitoring measures (see pages 3.11-155 through 168) it seems that the existing connections between the waterfront and Downtown San Pedro are weakened more and the environmental quality of the San Pedro Peninsula is degraded by increased traffic and poor air quality.

IMPACTS:

The report Impact Statement LU-3: "The proposed Project would not physically disrupt, divide, or isolate existing neighborhoods, communities, or land uses" is not supported by information in the report.

As noted on Table ES-10 page 54 the proposed project operations would increase auto traffic volumes and degrade the intersections capacity. The mitigation measures proposed that include modifying about a dozen intersections within the Downtown area to increase traffic carrying capacity, prohibiting weekday peak parking on Gaffey Street to add a traffic lane, and, prohibit parking on Harbor Boulevard to provide three lanes of traffic in each direction would have adverse effects on the environment. There will be no free parking on the Waterfront ("parking would no longer be free along the waterfront" page SE-31) and street parking is prohibited. This will create hardship and would not "enhance vehicular and pedestrian linkages to connect the communities to the Port" page 3.8-27.

As part of traffic study 36 intersections in the Downtown San Pedro area bounded by Gaffey (W). Front (N) Harbor Boulevard (E) and 22nd Street and two intersections at Western and 9th and 25th Streets were analyzed. Of the 36 intersections analyzed, 31 have traffic signals. As per the traffic study 32 of the 36 study intersections are at present operating at acceptable level of service. The four intersections with unacceptable level of service are Gaffey at 6th and 1st Streets, and, Summerland Avenue and Harbor Boulevard at 3rd Street.

For purposes of traffic study the traffic capacity (Level Of Service LOS) at intersections are categorized in six levels. LOS "A" being the best and "F" being worst. Service level D (number 4 in the 6 levels) or less is deemed acceptable. For signalized intersections level A is defined as where "No vehicle waits longer than one red light and no approach phase is fully used. At level D "delays may be substantial during portions of rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backup. Level E means waiting vehicles through several signal cycles and level F means tremendous delays. For non signal intersections level A means average delay is less then ten seconds per vehicle and for level F the delay per vehicle is 50 seconds or more. See Table 3.11-1 on page 3.11-13 and 3.11-14. As per the traffic study the traffic counts estimate for trip generation shows a "Net increase in trip over base line" in 2015 at 18,350 weekday daily and in 2037 at 22,679 trips.

The traffic study conclusion is that the proposed project would result in reduce the intersection capacity of 14 intersections to level D or worst (see Table 3.11-7 page 3.11-35) without mitigation. Applying the proposed mitigation measures (see page 3.11-37) would mitigate identified impacts on six of the 16 identified intersections in 2037.

The study also concludes that proposed project operations would increase traffic volumes and degrade LOS along neighborhood streets within the proposed project vicinity and that residual impacts "would be significant and unavoidable." (see page 3.11-45). "No feasible mitigation is identified to address these impacts." (page 3.11-168)

CUMULATIVE IMPACTS of the Water front project would
(1) Reduce traffic carrying capacity of most intersections in the Downtown San Pedro (2) eliminate street parking on two major streets (3) Degrade traffic capacity of neighborhood streets and, thus also (4) severely limit the future growth potential (building capacity) of the entire San Pedro Peninsula. Therefore,

2
the EIS report statement that "The proposed Project would not result in cumulative considerable impacts (after applicable mitigation) for Land Use Planning and Transportation." (page ES-69) is questionable.

The environmental effects on low income and minority populations would also be disproportionate. As stated in the DEIS "Impact AQ-4: Proposed project operations would result in offsite ambient air pollution concentrations that exceed a SCAQMD threshold of significance in Table 3.3-16. Significant and unavoidable." (page 8 of 72)

As noted in the report "The State of California CEQA Guidelines require an EIR to discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." No housing is proposed.

Also, as noted on Table ES-11 page 5 of 42, during the community outreach process it was suggested that "For reinforcing and facilitating linkages between the downtown San Pedro and its waterfront, areas for proposed land assembly consideration as joint development opportunity sites along the Harbor Boulevard should be studied that will provide physical and economic links, and provide public access to the waterfront." The EIS report has not identified any joint development opportunity sites.

RECOMMENDED MITIGATION MEASURES:

(1) The threshold standard for proposed land uses and related programs must encourage transit use to limit automobile trip generations within the San Pedro Peninsula.

To achieve this threshold following alternatives are recommended for consideration:
Provide and limit cruise terminal related long term parking along Front Street adjacent to Harbor Freeway exit ramps (north of Swinford Street and south of Channel Street) and connect the proposed parking via the red car and water taxi service with the inner and outer harbor terminals. In addition, provide a new service drive adjoining and parallel to the proposed promenade to give automobile access to the waterfront. This service drive within the Port land would restore some of the land street right-of-way land that existed within the 400 acre project area and was abandoned as right-of-way use by the Port.

The promenade service drive together with the cruise terminal parking, the red car rail and water taxi service off street parking at appropriate locations would serve as a multi-model integrated regional and local vehicular and pedestrian access to and within the waterfront. This measure would be in keeping with "Southern California Association of Governments (SCAG) Growth Management Policy #.12 (page 3.8-5) Encourage existing or proposed local jurisdictions’ programs aimed at designing land use which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.

(2) The threshold standard for proposed intersection improvement should be to limit impacts to maintain the current level of traffic capacity of intersection within the San Pedro Peninsula.

To improve carrying capacity at the impacted street intersections on Harbor Boulevard, Gaffey Street and other impacted intersections, the Port should purchase adjacent blighted and underutilized property to add additional lanes AND also provide land for redevelopment, for mixed use joint development including public open space and as relocation resources for any displaced housing and business. This measure is in keeping with recommendation (Table ES-11 page 5 of 42) made during the community outreach process to reinforce and facilitate linkages between the downtown San Pedro and its waterfront.

(3) Identify projects to reinforce and facilitate physical, economic and social linkages between the downtown San Pedro and its waterfront.

One of the redevelopment opportunity sites for mixed use development, including housing can be the vacated rail yard area adjacent to Port O'Call bluff area. This land area can be deemed as POLA surplus land after the rail use is abandoned and thus could be a prime redevelopment site for a mixed use project including housing to be developed in cooperation with the CRA and LAHA. A catalytic project at this site
would be in keeping with the State of California CEQA Guidelines, as noted in the DEIS, that require an EIR to discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

(4) The threshold standard for proposed air quality should be to limit off-site air pollution to current levels within the San Pedro Peninsula

As a mitigation measure Port should increase land area devoted to open space as landscape area along waterfront and also tree planting along streets and private property within San Pedro community. As noted in the DEIS “Impact AQ-4: Proposed project operations would result in offsite ambient air pollution concentrations that exceed a SCAQMD threshold of significance in Table 3.3-16. Significant and unavoidable.” (Page 8 of 72). Hence, to limit the adverse environmental effects of projected air pollution a substantial increase in open space and tree cover in and around Port area is essential. The Port of Los Angeles is composed of 43 miles of Waterfront and 7,500 acres of land and water, the proposed San Pedro Waterfront project is approximately 400 acres adjacent to the San Pedro Community. The percentage of land area devoted to tree cover and unpaved ground cover should be in keeping with the requirements to bring the air quality to thresholds that do not exceed acceptable levels.

To improve land utilization and bring the land uses in keeping in conformance with the proposed improvements the following land use changes are recommended: Land uses (page 3.3-8). West Bank Planning Area 2: Replace land use designations: General Cargo, Liquid Bulk, Industrial and Other and with Commercial, Recreational and Institutional land use designations. West Turning Basin Planning Area 3: Remove the General Cargo land use designation and designate instead Recreational land use.

Some observations that need to be explained:

- The Port of Los Angeles is composed of 43 miles of Waterfront and 7,500 acres of land and water, the proposed San Pedro Waterfront project is approximately 400 acres adjacent to the San Pedro Community. The only public park proposed on the waters edge is in the Outer Harbor on left over land sandwiched between Cabrillo Marina and Outer Harbor Cruise Buildings?

- Waterfront Promenade in the Inner Harbor area is build along Harbor Boulevard, separated from the Cruise Terminal area for security reasons. Along the Outer Harbor Area the proposed Promenade runs through the terminals.

- Waterfront Taxi stops (ES-6a) are not connected or coordinated with off street parking. The historic Ferry landing at the base of 6th Street is ignored. The historic ferry location at sixth and Harbor could be the iconic location for the ferry/water taxi system.

- As an alternative to isolated number of smaller buildings as proposed, a landmark multistory building could serve as a landmark for the waterfront.

- Millions to be spent on creating room for housing recently decommissions boats but no plans to renovate and enlarge an existing historic landmark building and showcase the historic educational material stored in the 6th Street Maritime Museum. Programs associated with the museum provided “as many as 5,000 youth-sailing days to schools and youth organizations”. Yet, “No changes to existing operations are anticipated under the proposed Project.” Page ES-34

- Town square (0.79 acre) with fronting on LA Maritime Museum “with 3-parking spaces for disabled visitors”. Between 4th Street and 10th Street no automobile access to Waterfront. (Page ES-38). The town square has no “town” activity generators (buildings/uses that attract activity). The proposed improvements destroy the historic context of the Ferry Building. This could be the place to re-house the historic ferry landing (water taxi service) and add space for stored exhibits of the Ferry building.
San Pedro Waterfront Project—Downtown Harbor—Comments

The Los Angeles Maritime Institute, TopSail Youth Program
Berth 84, Foot of Sixth Street, San Pedro, CA 90731
310-833-6055  Fax 310-548-2055  www.lamitopsail.org
Berthing and Facilities Considerations

Thank you for the opportunity to speak into the design process. It is the hope of the Los Angeles Maritime Institute that a continuing dialogue between all parties can produce an end result that is aesthetic as well as functional and be a real asset to the Port of Los Angeles and San Pedro: continuing to highlight the educational, environmental, cultural, and recreational aspects of LAMI TopSail.

LAMI’S DESIGN CONSIDERATIONS:
- Safe and easy access for school groups to board (up to 60 students/teachers) for day sails and overnight voyages (students will be carrying their sleeping bags and duffels for overnight voyages)
- Turn around and parking for school busses
- Secure parking for school busses, vehicles for sailing groups-group leaders, volunteers, crew, and service-repair people (including some overnight parking)
- Secure storage of vessel equipment, supplies, and small boats/kayaks on dock or with easy access to dock.
- Safe access for public tours, tall ship, naval, & historic vessel visits, and festival events
- Classrooms, offices and workshops with close, convenient access to Vessels (See Appendix A)
- Crane on dock, truck accessible, with adequate reach to load heavy objects, food and supplies, to the deck of docked vessels.
- Vessel security, lockable gates and the ability to open some sections of dock to the public and visiting vessels while keeping others secure.
- Dockside pump-out stations for holding tanks w/ sewer connection
- Dockside potable water hook ups to replenish vessel tanks
- Dockside fire hoses and hydrants
- Dockside safety equipment
- Shore power, 30 & 50 amp for LAMI vessels greater amperage for visiting Class “A” tall ships, naval, & historic vessels
- Adequate room to maneuver single screw sailing vessels with significant windage and deep draft. (See Appendix B)
- Adequate pilings, dock structure, cleats/bollards, and boarding space to accommodate visiting Class “A” tall ships, naval, & historic vessels on floating docks (i.e. USCG Barque Eagle, displacement 1,784 long tons)
- Near by, easy, access to recycling and trash dumpsters to keep the area “green”
- Night lighting of tall ship rigs for security and aesthetic/theatrical presentation
- TopSail Youth Center must be adjacent to Vessels
# APPENDIX A

## Los Angeles Maritime Institute TopSail Center Facility Needs

<table>
<thead>
<tr>
<th>TopSail Youth Center</th>
<th>Estimated Square Footage</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Meeting rooms:</strong></td>
<td>Total footage = 1500</td>
</tr>
<tr>
<td>Classroom for 60 w/ bookshelves and media capabilities</td>
<td></td>
</tr>
<tr>
<td>Boardroom and small group meeting area for 15+</td>
<td></td>
</tr>
<tr>
<td><strong>Offices:</strong></td>
<td>Total footage = 2000</td>
</tr>
<tr>
<td>President / Director</td>
<td></td>
</tr>
<tr>
<td>Executive Director</td>
<td></td>
</tr>
<tr>
<td>Program Administrator</td>
<td></td>
</tr>
<tr>
<td>Clerk/Reception/Phones</td>
<td></td>
</tr>
<tr>
<td>Volunteers and Crew Coordinator</td>
<td></td>
</tr>
<tr>
<td>Volunteers and Crew Preparation Room</td>
<td></td>
</tr>
<tr>
<td>Captains and Mates / Instructional Ship’s Business</td>
<td></td>
</tr>
<tr>
<td>Captains and Mates / Operational Ship’s Business</td>
<td></td>
</tr>
<tr>
<td>Fund Development</td>
<td></td>
</tr>
<tr>
<td>Boatswain (maintenance coordinator)</td>
<td></td>
</tr>
<tr>
<td>Projects</td>
<td></td>
</tr>
<tr>
<td><strong>Food areas:</strong></td>
<td>Total footage = 425</td>
</tr>
<tr>
<td>Kitchen</td>
<td></td>
</tr>
<tr>
<td>Dining area</td>
<td></td>
</tr>
<tr>
<td><strong>Maintenance area:</strong></td>
<td>Total footage = 1950</td>
</tr>
<tr>
<td>Workshop with band saw, table saw, jointer, drill press, etc.</td>
<td></td>
</tr>
<tr>
<td>Tool room plus materials and supplies</td>
<td></td>
</tr>
<tr>
<td>Maintenance work areas with space for:</td>
<td></td>
</tr>
<tr>
<td>Small boat construction and repair</td>
<td></td>
</tr>
<tr>
<td>Spar and rigging loft</td>
<td></td>
</tr>
<tr>
<td><strong>Facilities:</strong></td>
<td>Total footage = 300</td>
</tr>
<tr>
<td>Men’s restroom with showers</td>
<td></td>
</tr>
<tr>
<td>Women’s restroom with showers</td>
<td></td>
</tr>
<tr>
<td>Laundry room with washer and dryer</td>
<td></td>
</tr>
<tr>
<td><strong>Storage rooms:</strong></td>
<td>Total footage = 1455</td>
</tr>
<tr>
<td>Vessel shore-side storage, seasonal equipment etc.</td>
<td></td>
</tr>
<tr>
<td>Instructional materials and archives</td>
<td></td>
</tr>
<tr>
<td>Merchandise</td>
<td></td>
</tr>
<tr>
<td>Lockers for volunteers, interns and crew personal items</td>
<td></td>
</tr>
<tr>
<td>Active files and safe</td>
<td></td>
</tr>
<tr>
<td>Classroom closet</td>
<td></td>
</tr>
<tr>
<td>Custodial and water heater</td>
<td></td>
</tr>
<tr>
<td>Electrical and phone panels</td>
<td></td>
</tr>
<tr>
<td><strong>Total building floor space and enclosed outdoor work yard:</strong> = 7630</td>
<td></td>
</tr>
</tbody>
</table>

**Parking:** Typical use (Varies) 70 spaces (includes staff, voyaging crew, school groups-leaders, meetings, classes and volunteers)
APPENDIX B
Berthing for sail training vessels/tall ships requires special consideration and further study.

Each of the projected new harbor elements presents different circumstances, whether LAMI vessels or visiting tall ships are in the new North Harbor, Downtown Harbor or by the Ports O’ Call Promenade, along the main channel. The SPWP diagrams and drawings of the Downtown Harbor show ships berthed alongside the pier, perpendicular to the channel/current and/or inside a basin with limited maneuvering space.

Unlike the tugs and the fireboat, the LAMI sailing ships are deep-keeled, single screw and low-powered, with lofty spars and significant windage even without sails set. As you know, vessels with these characteristics, used with youth education programs, require floating docks with heavy cleats like we have now.

At this time at Berth 78 with the dock parallel to the main channel, our captains are often able to sail off and onto the dock, maneuvering with the current and a prevailing cross wind. The Downtown Harbor presents different circumstances: maneuvering into the prevailing wind and with cross-currents; other considerations include having to deal with backing situations, different angles of approach, underwater effects from large cruise/commercial ships and other boat traffic restrictions.

Here are our LAMI Vessel specs:

Square topsail schooner Swift of Ipswich, built 1938, Ipswich, MA
(Berth 84, behind the LA Maritime Museum…currently in restoration)
- Spared length: 90’
- Length Water Line: 62’
- Draft: 10’
- Beam: 18’
- Displacement: 65 LT
- Rig Height: 74’
- Hull: Wood
- Power: Single-screw, Diesel

Twin Brigantines Irving Johnson and Exy Johnson, built 2002, San Pedro, CA
(Currently ‘temporarily’ at Berth 78)
- Spared length: 111’
- Length Water Line: 72’6”
- Draft: 11’
- Beam: 21’ 9”
- Displacement: 130 LT
- Rig Height: 87’8”
- Hull: Wood
- Power: Single-screw, 315HP Diesel
All,

Please see attached comment letter document, revised only to correct Header to Air Quality Subcommittee with text same as previously submitted and as pasted below. Thank you.

--

Richard Havenick

----- havenick@cox.net wrote:

> (Submitted 12/08/08 through Air Quality Subcommittee of the Port Community Advisory Committee; Richard Havenick, 3707 Parker Street, San Pedro, CA 90731)
> 
> > Dear Dr. Appy and Dr. MacNeil,
> 
> > We hereby submit our comments regarding the Subject EIR/EIS and the respective Proposed Project with the GENERAL RECOMMENDATIONS and SPECIFIC COMMENTS listed below.
> 
> > GENERAL RECOMMENDATIONS
> 
> > The resulting Final Project Description should be designed such that declaration of Overriding Considerations for Significant and Unavoidable Environmental Impacts is not necessary and for Project impacts that remain significant, the Port shall implement emission reduction measures elsewhere such that port-wide emissions do not increase.
> 
> > SPECIFIC COMMENTS
> 
> > 1. As the EIR/EIS clearly demonstrates that significant impacts can largely be reduced, saving countless lives, through revision to exclude the Cruise Terminal at South Harbor, the Air Quality Subcommittee is opposed to construction and operation of the proposed Cruise Terminal in the Outer Harbor.
> 
> > 2. The Proposed Project would be constructed in the location already identified as a Federal non-attainment area for Air Quality, would result in
significant and unavoidable impacts which cannot be mitigated, and would increase the inhumane exposure of thousands of residents to toxic air emissions known to cause cancer, multiple heart and respiratory illnesses, and death.

> 3. The Proposed Project would increase greenhouse gas emissions by several orders of magnitude beyond that for Alternative 4, which excludes the outer Harbor Cruise Terminal.

> 4. All project descriptions require revision to include immediate implementation of Alternative Maritime Emission Control System (AMECS) either in combination with or in place of AMP.

> 5. The increased capability for reduction in ship emissions applicable to the ships planned for the outer harbor berths creates an Environmental Justice inequality wherein the community in close proximity to the inner harbor berths would suffer more greatly than persons in close proximity to the outer harbor berths. From a public health standpoint as well as an Environmental Justice standpoint, operations at the inner harbor berths should be held to the same emission reduction standards as the outer harbor berths. Moreover, splitting the ship emissions associated with expanded cruise operations between two separate locations that are in such close proximity creates a statistical outcome that understands the impacts caused by the resulting emissions.

> 6. The following mitigation measures applicable to the Proposed Project and Alternatives for both inner and outer harbor require revision as stated:

> a. The MM-AQ-9 should require 100% Alternative Maritime Power (AMP) for Cruise Vessels immediately on start of Project operations. Reference current phase-in stated as, “30% in 2009 and 80% in 2013;” and, “97% in 2013 and thereafter” at Outer Harbor.

> b. The MM AQ-3 should require 100% compliance to USEPA 2007 emission standards for on-road trucks during construction phase. Reference current requirement stated as, “January 1, 2009 to December 31, 2011, shall comply with EPA 2004.”

> c. The MM AQ-15 should require 100% compliance to USEPA 2007 emission standards for on-road trucks during construction phase. Reference MM AQ-15 currently stated as, “20% in 2009, 40% in 2012, and 80% in 2015 and thereafter.”

> d. All Project measures applicable to Low Sulfur Fuel (LSF) in Cruise Vessels require revision to require every possible effort to ensure use of 0.2 percent maximum sulfur content fuel immediately on start of Project operations without exemptions for technical difficulties (e.g., mono tank). Refer to MM AQ-10, “Inner Harbor – 30% in 2009 and 90% in 2013 and thereafter;” and, “Outer Harbor – 90% in 2013.”

> e. All uses planned for LNG-Powered Shuttle Busses require change to
implement electric-powered buses. Reference MM QA-14, LNG-Powered Shuttle Busses.

> f. The MM AQ-18 requires the following revisions:
> i. Require full EPA Tier 2 compliance at start of Project operations until implementation of Tier 3. Currently stated phase-in of Tier 2 is 30% in 2010 and 100% in 2014.
> ii. Require full EPA Tier 3 compliance in year 2015. Currently stated phase-in of Tier 3 is 20% in 2015, 50% in 2018, and 100% in 2020.
> g. The MM AQ-21 must require EPA Tier 2 compliance at 100% in 2010 rather than as currently stated, 30% in 2010 and 100% in 2014.
> h. The MM AQ-22 should state the basis of periodic review such as once yearly and no less frequently than every five years. Currently stated measure includes no timing requirement for review.
> i. The MM QA-23 should be revised to include no less than two additional review cycles between the years of 2022 and 2037.

> 7. The following Impacts applicable to the Proposed Project require revision as stated:
> a. Significant understatement in AQ-9 regarding cumulative impacts that would result from the Proposed Project requires correction and clarification. The statement under the section, Impact AQ-9, page 3.2-124, “In actuality, an appreciable impact on global climate change would occur only when the proposed project GHG emissions combine with GHG emissions from other man-made activities on a global scale” demonstrates a fundamental misapplication in consideration of cumulative impacts. Reasonable minds would agree that pollution from Port operations exists within the environment of regional pollution and that the communities closest to the Port and to goods transport are affected most significantly. The Port has the responsibility to reduce impacts on project-specific basis without relief for application of the concept that pollution results on a global scale and as such, project-specific pollution is more acceptable.
> b. Likely significant under estimation for on road vehicle emissions in AQ-3 results from the Port’s mistaken calculation of pollution resulting from transport of people to and from the Outer Harbor Cruise terminal as follows:
> i. The corrected total number of shuttle buses required in optimal circumstances (maximum participation in shuttle bus option) is a quantity of 640 shuttle trips per day on the days of arrivals/departures. Note the following numeric elements: two ships; 4,000 people per ship; one arrival and one departure per ship; and, 25 persons per shuttle bus.
> ii. A significant quantity of Cruise Ship passengers will chose private transport (e.g., taxi, limousine, friend, etc.) to the Outer Harbor, resulting in significant increase in on-road vehicle emissions, not included in the Port’s calculation.

> We look forward to release of the Final EIR/EIS with incorporation of our
recommendations as we seek mutually to benefit from improved air quality.

> Richard Havenick
> Chair, Air Quality Subcommittee
> Port Community Advisory Committee
> (for the Port of Los Angeles)
> Dear Dr. Appy and Dr. MacNeil,
> --
> Richard Havenick
Dr. Spencer D. MacNeil  
U.S. Army Corps of Engineers  
Los Angeles District  
Regulatory Division, Ventura Field Office  
2151 Alessandro Drive, Suite 110  
Ventura, CA 93001

Dr. Ralph Appy  
Director Environmental Management Division  
425 S. Palos Verdes Street  
San Pedro, CA 90731

Subject: Comments Submittal for the Draft Supplemental EIR/EIS for the San Pedro Waterfront Project

Dear Dr. Appy and Dr. MacNeil,

We hereby submit our comments regarding the Subject EIR/EIS and the respective Proposed Project with the GENERAL RECOMMENDATIONS and SPECIFIC COMMENTS listed below.

GENERAL RECOMMENDATIONS

The resulting Final Project Description should be designed such that declaration of Overriding Considerations for Significant and Unavoidable Environmental Impacts is not necessary and for Project impacts that remain significant, the Port shall implement emission reduction measures elsewhere such that port-wide emissions do not increase.

SPECIFIC COMMENTS

1. As the EIR/EIS clearly demonstrates that significant impacts can largely be reduced, saving countless lives, through revision to exclude the Cruise Terminal at South Harbor, the Air Quality Subcommittee is opposed to construction and operation of the proposed Cruise Terminal in the Outer Harbor.

2. The Proposed Project would be constructed in the location already identified as a Federal non-attainment area for Air Quality, would result in significant and unavoidable impacts which cannot be mitigated, and would increase the inhumane exposure of thousands of residents to toxic air emissions known to cause cancer, multiple heart and respiratory illnesses, and death.

3. The Proposed Project would increase greenhouse gas emissions by several orders of magnitude beyond that for Alternative 4, which excludes the outer Harbor Cruise Terminal.

4. All project descriptions require revision to include immediate implementation of Alternative Maritime Emission Control System (AMECS) either in combination with or in place of AMP.
5. The increased capability for reduction in ship emissions applicable to the ships planned for the outer harbor berths creates an Environmental Justice inequality wherein the community in close proximity to the inner harbor berths would suffer more greatly than persons in close proximity to the outer harbor berths. From a public health standpoint as well as an Environmental Justice standpoint, operations at the inner harbor berths should be held to the same emission reduction standards as the outer harbor berths. Moreover, splitting the ship emissions associated with expanded cruise operations between two separate locations that are in such close proximity creates a statistical outcome that understands the impacts caused by the resulting emissions.

6. The following mitigation measures applicable to the Proposed Project and Alternatives for both inner and outer harbor require revision as stated:
   a. The MM-AQ-9 should require 100% Alternative Maritime Power (AMP) for Cruise Vessels immediately on start of Project operations. Reference current phase-in stated as, “30% in 2009 and 80% in 2013;” and, “97% in 2013 and thereafter” at Outer Harbor.
   b. The MM AQ-3 should require 100% compliance to USEPA 2007 emission standards for on-road trucks during construction phase. Reference current requirement stated as, “January 1, 2009 to December 31, 2011, shall comply with EPA 2004.”
   c. The MM AQ-15 should require 100% compliance to USEPA 2007 emission standards for on-road trucks during construction phase. Reference MM AQ-15 currently stated as, “20% in 2009, 40% in 2012, and 80% in 2015 and thereafter.”
   d. All Project measures applicable to Low Sulfur Fuel (LSF) in Cruise Vessels require revision to require every possible effort to ensure use of 0.2 percent maximum sulfur content fuel immediately on start of Project operations without exemptions for technical difficulties (e.g., mono tank). Refer to MM AQ-10, “Inner Harbor – 30% in 2009 and 90% in 2013 and thereafter;” and, “Outer Harbor – 90% in 2013.”
   e. All uses planned for LNG-Powered Shuttle Busses require change to implement electric-powered busses. Reference MM QA-14, LNG-Powered Shuttle Busses.
   f. The MM AQ-18 requires the following revisions:
      i. Require full EPA Tier 2 compliance at start of Project operations until implementation of Tier 3. Currently stated phase-in of Tier 2 is 30% in 2010 and 100% in 2014.
      ii. Require full EPA Tier 3 compliance in year 2015. Currently stated phase-in of Tier 3 is 20% in 2015, 50% in 2018, and 100% in 2020.
   g. The MM AQ-21 must require EPA Tier 2 compliance at 100% in 2010 rather than as currently stated, 30% in 2010 and 100% in 2014.
   h. The MM AQ-22 should state the basis of periodic review such as once yearly and no less frequently than every five years. Currently stated measure includes no timing requirement for review.
   i. The MM QA-23 should be revised to include no less than two additional review cycles between the years of 2022 and 2037.

7. The following Impacts applicable to the Proposed Project require revision as stated:
   a. Significant understatement in AQ-9 regarding cumulative impacts that would result from the Proposed Project requires correction and clarification. The statement under the section, Impact AQ-9, page 3.2-124, “In actuality, an appreciable impact on global climate change would occur only when the proposed project GHG emissions combine with GHG emissions from other man-made activities on a global scale” demonstrates a fundamental misapplication in consideration of cumulative impacts. Reasonable minds would agree that pollution from Port operations exists within the environment of regional pollution and that the communities closest to the Port and to goods transport are affected most significantly. The Port has the responsibility to reduce impacts on project-specific basis without relief for application of the concept that pollution results on a global scale and as such, project-specific pollution is more acceptable.
b. Likely significant under estimation for on road vehicle emissions in AQ-3 results from the Port’s mistaken calculation of pollution resulting from transport of people to and from the Outer Harbor Cruise terminal as follows:
   i. The corrected total number of shuttle buses required in optimal circumstances (maximum participation in shuttle bus option) is a quantity of 640 shuttle trips per day on the days of arrivals/departures. Note the following numeric elements: two ships; 4,000 people per ship; one arrival and one departure per ship; and, 25 persons per shuttle bus.
   ii. A significant quantity of Cruise Ship passengers will chose private transport (e.g., taxi, limousine, friend, etc.) to the Outer Harbor, resulting in significant increase in on-road vehicle emissions, not included in the Port’s calculation.

We look forward to release of the Final EIR/EIS with incorporation of our recommendations as we seek mutually to benefit from improved air quality.

Richard Havenick  
Chair, Air Quality Subcommittee  
Port Community Advisory Committee  
(for the Port of Los Angeles)
December 8, 2008

Dr. Spencer D. MacNeil  
U.S. Army Corps of Engineers  
Los Angeles District  
Regulatory Division, Ventura Field Office  
2151 Alessandro Drive, Suite 110  
Ventura, CA  93001

Dr. Ralph Appy  
Director Environmental Management Division  
425 S. Palos Verdes Street  
San Pedro, CA  90731

Subject: Comments Submittal for the Draft Supplemental EIR/EIS for the San Pedro Waterfront Project

Dear Dr. Appy and Dr. MacNeil,

We hereby submit our comments regarding the Subject EIR/EIS and the respective Proposed Project with the GENERAL RECOMMENDATIONS and SPECIFIC COMMENTS listed below.

GENERAL RECOMMENDATIONS

The resulting Final Project Description should be designed such that declaration of Overriding Considerations for Significant and Unavoidable Environmental Impacts is not necessary and for Project impacts that remain significant, the Port shall implement emission reduction measures elsewhere such that port-wide emissions do not increase.

SPECIFIC COMMENTS

1. As the EIR/EIS clearly demonstrates that significant impacts can largely be reduced, saving countless lives, through revision to exclude the Cruise Terminal at South Harbor, the Air Quality Subcommittee is opposed to construction and operation of the proposed Cruise Terminal in the Outer Harbor.

2. The Proposed Project would be constructed in the location already identified as a Federal non-attainment area for Air Quality, would result in significant and unavoidable impacts which cannot be mitigated, and would increase the inhumane exposure of thousands of residents to toxic air emissions known to cause cancer, multiple heart and respiratory illnesses, and death.

3. The Proposed Project would increase greenhouse gas emissions by several orders of magnitude beyond that for Alternative 4, which excludes the outer Harbor Cruise Terminal.

4. All project descriptions require revision to include immediate implementation of Alternative Maritime Emission Control System (AMECS) either in combination with or in place of AMP.
5. The increased capability for reduction in ship emissions applicable to the ships planned for the outer harbor berths creates an Environmental Justice inequality wherein the community in close proximity to the inner harbor berths would suffer more greatly than persons in close proximity to the outer harbor berths. From a public health standpoint as well as an Environmental Justice standpoint, operations at the inner harbor berths should be held to the same emission reduction standards as the outer harbor berths. Moreover, splitting the ship emissions associated with expanded cruise operations between two separate locations that are in such close proximity creates a statistical outcome that understands the impacts caused by the resulting emissions.

6. The following mitigation measures applicable to the Proposed Project and Alternatives for both inner and outer harbor require revision as stated:
   a. The MM-AQ-9 should require 100% Alternative Maritime Power (AMP) for Cruise Vessels immediately on start of Project operations. Reference current phase-in stated as, “30% in 2009 and 80% in 2013;” and, “97% in 2013 and thereafter” at Outer Harbor.
   b. The MM AQ-3 should require 100% compliance to USEPA 2007 emission standards for on-road trucks during construction phase. Reference current requirement stated as, “January 1, 2009 to December 31, 2011, shall comply with EPA 2004.”
   c. The MM AQ-15 should require 100% compliance to USEPA 2007 emission standards for on-road trucks during construction phase. Reference MM AQ-15 currently stated as, “20% in 2009, 40% in 2012, and 80% in 2015 and thereafter.”
   d. All Project measures applicable to Low Sulfur Fuel (LSF) in Cruise Vessels require revision to require every possible effort to ensure use of 0.2 percent maximum sulfur content fuel immediately on start of Project operations without exemptions for technical difficulties (e.g., mono tank). Refer to MM AQ-10, “Inner Harbor – 30% in 2009 and 90% in 2013 and thereafter;” and, “Outer Harbor – 90% in 2013.”
   e. All uses planned for LNG-Powered Shuttle Busses require change to implement electric-powered busses. Reference MM QA-14, LNG-Powered Shuttle Busses.
   f. The MM AQ-18 requires the following revisions:
      i. Require full EPA Tier 2 compliance at start of Project operations until implementation of Tier 3. Currently stated phase-in of Tier 2 is 30% in 2010 and 100% in 2014.
      ii. Require full EPA Tier 3 compliance in year 2015. Currently stated phase-in of Tier 3 is 20% in 2015, 50% in 2018, and 100% in 2020.
   g. The MM AQ-21 must require EPA Tier 2 compliance at 100% in 2010 rather than as currently stated, 30% in 2010 and 100% in 2014.
   h. The MM AQ-22 should state the basis of periodic review such as once yearly and no less frequently than every five years. Currently stated measure includes no timing requirement for review.
   i. The MM QA-23 should be revised to include no less than two additional review cycles between the years of 2022 and 2037.

7. The following Impacts applicable to the Proposed Project require revision as stated:
   a. Significant understatement in AQ-9 regarding cumulative impacts that would result from the Proposed Project requires correction and clarification. The statement under the section, Impact AQ-9, page 3.2-124, “In actuality, an appreciable impact on global climate change would occur only when the proposed project GHG emissions combine with GHG emissions from other man-made activities on a global scale” demonstrates a fundamental misapplication in consideration of cumulative impacts. Reasonable minds would agree that pollution from Port operations exists within the environment of regional pollution and that the communities closest to the Port and to goods transport are affected most significantly. The Port has the responsibility to reduce impacts on project-specific basis without relief for application of the concept that pollution results on a global scale and as such, project-specific pollution is more acceptable.
b. Likely significant under estimation for on road vehicle emissions in AQ-3 results from the Port’s mistaken calculation of pollution resulting from transport of people to and from the Outer Harbor Cruise terminal as follows:
   i. The corrected total number of shuttle buses required in optimal circumstances (maximum participation in shuttle bus option) is a quantity of 640 shuttle trips per day on the days of arrivals/departures. Note the following numeric elements: two ships; 4,000 people per ship; one arrival and one departure per ship; and, 25 persons per shuttle bus.
   ii. A significant quantity of Cruise Ship passengers will chose private transport (e.g., taxi, limousine, friend, etc.) to the Outer Harbor, resulting in significant increase in on-road vehicle emissions, not included in the Port’s calculation.

We look forward to release of the Final EIR/EIS with incorporation of our recommendations as we seek mutually to benefit from improved air quality.

Richard Havenick
Chair, Air Quality Subcommittee
Port Community Advisory Committee
(for the Port of Los Angeles)
December 8, 2008

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

Dear Dr. Appy,

Pacific Harbor Line supports the San Pedro Waterfront Project, as described in the DEIR/DEIS. We believe that this project will bring many important benefits to the residents of San Pedro and to the local business community. We urge that this project move forward as soon as possible.

With regard to the business community, it’s particularly important that this project be constructed in a way that meets the needs of the cruise industry. It’s difficult to name another industry that has such a far-reaching effect on local businesses. Hotels, restaurants, retail establishments, service providers, provisioning vendors, and local labor all benefit significantly with every ship call made. We acknowledge that there is controversy about the proposed outer harbor cruise terminal. However, given current trends in ship construction it is vital that San Pedro be able to handle “Freedom class” vessels in order to remain competitive in the west coast cruise port market. Forcing a vessel of this size to back down the channel to the existing cruise terminals is not a competitive offering in this market, and constructing a terminal at Ports O’Call, while appealing in the abstract, seems infeasible for reasons of navigational safety. Meanwhile, the reduction in air pollution that results from a ship of that size using an outer harbor berth and having an inbound/outbound transit that is 30 - 45 minutes shorter than for an inner harbor berth is a compelling benefit for the outer harbor location. If constructed with the vehicular traffic and aesthetic mitigation strategies listed in the various outer harbor terminal alternatives, the outer harbor is the best location for new large ship facilities.

Thank you for considering our input on this important project.

Sincerely,

Andrew C. Fox
President
Please see attached our comment letter to the above referenced EIS/EIR. A hard copy is being sent via US Mail, postmarked today.

I may be reached at the following address:

Patrick Tooley
Vice President
Wilson Meany Sullivan
100 Wilshire Blvd.
Suite 940
Santa Monica, CA 90401
310-382-9000
December 8, 2008

Dr. Spencer D. MacNeil  
U.S. Army Corps of Engineers, Los Angeles District  
Regulatory Division, Ventura Field Office  
2151 Alessandro Drive, Suite 110  
Ventura, CA 93001

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


Dear Drs. MacNeil and Appy:

We have reviewed the Draft EIS/EIR for the above-captioned project and are excited about the redevelopment potential for the San Pedro Waterfront area and the attendant improvements to pedestrian and vehicular access to the waterfront. We also commend the Los Angeles Harbor Department and the City of Los Angeles for their stated commitment to sustainable design and green building within our community.

As you may know, Wilson Meany Sullivan ("WMS") is a privately owned real estate investment and development firm focused on urban infill locations in the Western United States. WMS brings more than 35 years of experience to its mixed-use, residential, retail and office developments, all of which reflect the company's commitment to integrity, innovation and quality. Collectively, WMS’s partners and professionals have developed over 10 million square feet, including some of the most innovative and distinctive properties in California.

Upon review of the Draft EIS/EIR, WMS supports the Proposed Project as set forth therein. WMS further notes that Alternative 3, the "reduced project" alternative, provides for less square footage to be developed with respect to visitor-serving commercial opportunities. Given the economies of scale and scope of entitlements for a larger redevelopment project, we question whether the reduced size in Alternative 3 is sufficient to meet the overall goals for the waterfront to the same degree as the Proposed Project. The efforts to revitalize the San Pedro Waterfront present a unique and important moment for long-term commercial development in the area, and considerations of how to best maximize all available resources and approvals should be central to the overall analysis.
Please do not hesitate to contact me should you have any questions about this matter.

Cordially,

Patrick B. Yooley
December 3, 2008

Dr. Spencer D. MacNeil
Senior Project Manager
U. S. Army Corps of Engineers, Los Angeles District
2151 Alessandro Drive, Suite 110
Ventura, CA 93001

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

Dear Sirs;

I hold office in both the South Bay Association of Chambers of Commerce (Treasurer) and the Lomita Chamber of Commerce (President). As such I have voted to endorse the Los Angeles Harbor Department's San Pedro Waterfront Project DEIR/DEIS.

This project proposes improvements to the San Pedro Waterfront and will provide jobs and new businesses to the entire region of the South Bay. Also included in the project are Open Spaces and Parks for the public to enjoy.

As a representative of both the South Bay Association of Chambers of Commerce and the Lomita Chamber of Commerce, I endorse the "San Pedro Waterfront Project" as proposed by the Los Angeles Harbor Department.

Sincerely,

George Kivett
President
Corps of Engineers and Port of LA,

Below and Attached are the comments on the San Pedro Waterfront Project from the Light, Aesthetics and Noise subcommittee. Because I was out of town, my email would not send them until I returned on Thursday. Please include them in the comments submitted by the deadline. They were approved in November.

peter warren,
chair of the LAN subcommittee.
The following motion was approved by the LAN Committee and is its comment on the Waterfront Plan for San Pedro.

Motion as approved:
Whereas, the Port plan for a Cruise Ship Terminal at Kaiser Point will introduce new and increased levels of traffic, noise and intrusive lighting to south San Pedro, and;

Whereas, industrial uses such as the cruise business should be kept contiguous, and;

Whereas, existing and future San Pedro business and job development will benefit by improving and expanding the cruise ship berths near downtown and modernizing the cruise terminal there, and;

Whereas, Ports O’ Call should also be expanded and modernized but not on a scale that would threaten existing business, and future development near and in downtown,

Whereas, the outer harbor berthing will proliferate noise, light, traffic and air quality impacts more than a single downtown alternative, and;

Whereas, the outer berthing options add up to 600 bus trips, and hundreds of car and truck trips a day through San Pedro to Kaiser Point with attendant noise, light, air pollution and traffic, and;

Whereas, the area south of 22nd Street should be a limited noise and light impact zone and should be developed for lower impact uses, and;

Whereas, this area should be dedicated to science, education, research, recreation, habitat preservation, people-friendly and compatible business uses.

Therefore, be it resolved that the Light Aesthetics and Noise Subcommittee supports the Sustainable Waterfront Plan and strongly opposes any permanent berthing of cruise ships in the outer harbor.

The recommendation was moved by Carrie Scoville, Second by Chuck Hart and passed with 2 Ayes, 0 Nays and 0 Abstentions.
Peter Warren stated that he had received a response to his comment letter that he wrote regarding the San Pedro Waterfront DEIR. He stated that the biggest deficiency in terms of following CEQA, was the failure to analyze the Sustainable Waterfront Plan, which was submitted to the Port as an alternative.

He inquired from the Subcommittee as to whether there was a need for a separate motion to address this issue. It was the sense of the Subcommittee that the San Pedro Coordinated Plan Subcommittee should consider such a motion.

- Pacific LA Marine Terminal, Pier 400 SEIR (Super Tanker)
  There was no action taken on this Item.

G. Plans for Lighting Retrofits at Berths 118-131, Kinder Morgan and West Basin Container Terminal/Yang Ming Facilities – Discussion was postponed, as there were no Port staff members in attendance. Dr. Appy communicated that he would be traveling and unable to attend, but that he would send another staff member in his stead.

H. Agenda Items for Next Meeting: December 8, 2008
   - The Glare and Noise Study
   - Plans for Lighting Retrofits at Berths 118-131, Kinder Morgan and West Basin Container Terminal/Yang Ming Facilities
   - Update on the Metrics for Noise and Light Levels
   - Update on Getting Consultants for the Subcommittee

I. Adjournment: 5:45 PM

Peter Warren, Chair
Light, Aesthetics, and Noise Subcommittee

Debra Babcock-Doherty, PCAC Executive Assistant
The following motion was approved by the LAN Committee and is its comment on the Waterfront Plan for San Pedro.

Motion as approved:

Whereas, the Port plan for a Cruise Ship Terminal at Kaiser Point will introduce new and increased levels of traffic, noise and intrusive lighting to south San Pedro, and;

Whereas, industrial uses such as the cruise business should be kept contiguous, and;

Whereas, existing and future San Pedro business and job development will benefit by improving and expanding the cruise ship berths near downtown and modernizing the cruise terminal there, and;

Whereas, Ports O’ Call should also be expanded and modernized but not on a scale that would threaten existing business, and future development near and in downtown,

Whereas, the outer harbor berthing will proliferate noise, light, traffic and air quality impacts more than a single downtown alternative, and;
Whereas, the outer berthing options add up to 600 bus trips, and hundreds of car and truck trips a day through San Pedro to Kaiser Point with attendant noise, light, air pollution and traffic, and;

Whereas, the area south of 22nd Street should be a limited noise and light impact zone and should be developed for lower impact uses, and;

Whereas, this area should be dedicated to science, education, research, recreation, habitat preservation, people-friendly and compatible business uses.

Therefore, be it resolved that the Light Aesthetics and Noise Subcommittee supports the Sustainable Waterfront Plan and strongly opposes any permanent berthing of cruise ships in the outer harbor.

The recommendation was moved by Carrie Scoville, Second by Chuck Hart and passed with 2 Ayes, 0 Nays and 0 Abstentions.

Peter Warren stated that he had received a response to his comment letter that he wrote regarding the San Pedro Waterfront DEIR. He stated that the biggest deficiency in terms of following CEQA, was the failure to analyze the Sustainable Waterfront Plan, which was submitted to the Port as an alternative.

He inquired from the Subcommittee as to whether there was a need for a separate motion to address this issue. It was the sense of the Subcommittee that the San Pedro Coordinated Plan Subcommittee should consider such a motion.

- Pacific LA Marine Terminal, Pier 400 SEIR (Super Tanker)

There was no action taken on this Item.
G. Plans for Lighting Retrofits at Berths 118-131, Kinder Morgan and West Basin Container Terminal/Yang Ming Facilities – Discussion was postponed, as there were no Port staff members in attendance. Dr. Appy communicated that he would be traveling and unable to attend, but that he would send another staff member in his stead.

H. Agenda Items for Next Meeting: December 8, 2008
   • The Glare and Noise Study
   • Plans for Lighting Retrofits at Berths 118-131, Kinder Morgan and West Basin Container Terminal/Yang Ming Facilities
   • Update on the Metrics for Noise and Light Levels
   • Update on Getting Consultants for the Subcommittee

I. Adjournment: 5:45 PM

Peter Warren, Chair
Light, Aesthetics, and Noise Subcommittee

Debra Babcock-Doherty, PCAC Executive Assistant
We support the idea of building the greenest cruise terminal possible and reiterate our support in working with the port to help design cruise terminals that meet the needs of the passengers, community and the Port. The cruise industry needs to develop terminals that work for the ships calling today and for the ships calling in the future. In addition, we understand the desire to have the public interact with the waterfront and park areas near the cruise terminal while also maintaining a safe and secure operation for our ships. In addition, the waterside security zone and the affect it has on small boats in the harbor is important to note. Princess Cruises fully cooperates with the security regulations put forth by the Coast Guard; but we do want to work with the concerned parties to utilize all the options available to creating a secure environment for our ships and our passengers. Of note is the “floating barrier” concept discussed in the EIR, this is the type of alternative that creates a good secure location while also addressing the need of the small boat community.

We are excited about the prospects of revitalizing the waterfront and are encouraged by the steps the Port has taken to move this project to the next level.

Bruce Krumrine
Vice President Shore Operations Princess Cruises
Dr. Spencer D. MacNeil
U.S. Army Corps of Engineers, Los Angeles District
Regulatory Division, Ventura Field Office
2151 Alessandro Drive, Suite 110
Ventura, California 93001

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

Re: San Pedro Waterfront Project EIR

As a customer of the Port of Los Angeles, we have a significant stake in the future of the Port. We are supportive of the waterfront project that seeks to enhance the visitor serving portions of the Port. Our customer and our crew members have a direct relationship with the waterfront businesses and the businesses adjacent to the waterfront such as hotels, shopping, and transportation. In addition, the ships utilize harbor area suppliers for much of the ships' operations plus employing local labor for our shore side operations.

Princess Cruises welcomes the opportunity to comment on the San Pedro Waterfront EIR. Princess Cruises is in support of the San Pedro Waterfront Project and the goal of sustainable development that will bring people, prosperity and revitalization to the waterfront of the Port of Los Angeles.

While the proposed project meets most of our needs, alternative number 2 with the parking for cruise passengers at both the inner harbor and at the new outer harbor development is our preferred option. We feel this is the best solution for efficient and cost effective operations and would be the best solution for our customers.
November 11, 2008

Dr. Spencer D. MacNeil
U.S. Army Corps of Engineers, Los Angeles District
Regulatory Division, Ventura Field Office
2151 Alessandro Drive, Suite 110
Ventura, California 93001

Dear Dr. MacNeil:

As an organization that is dedicated to promoting tourism and travel to Los Angeles, LA INC. The Los Angeles Visitors and Convention Bureau, supports initiatives that will position LA as a premier cruise center. The Port of LA is vital to the City’s economic fabric and serves as the gateway to Southern California. It is home to one of the nation’s largest cruise passenger complexes and will welcome 1.2 million people in 2008.

The success of the LA cruise industry contributes largely to the local economy. It has created 1,277 local jobs and generates $5.7 million in state and local tax revenue. Cruise passengers that come through the Port of LA spend an average of $15.9 million each year in the Harbor area alone, and spend $44.7 million in the LA region each year on shopping, dining and hotel stays. 2007 saw cruise line companies spending an average of $65.1 million in the Harbor area.

Enhancing the Port for the cruise line industry will attract more international and domestic travelers and visitors who will be able to experience Los Angeles as a premier destination. As LA INC. dedicates itself to promoting Los Angeles to the world, the Port aids us in that effort by attracting cruise-line travelers to a world-class cruise port. During these current economic times, the cruise industry is one of the more stable and growing segments of the tourism industry. Improving it will only allow San Pedro to continue its image as a regional attraction and generate more revenue into the local economy.

Respectfully,

Mark Liberman
President and CEO
LA INC. The Visitors and Convention Bureau
Dr. Spencer D. MacNeil  
US Army Corps of Engineers  
Los Angeles District  
Regulatory Division  
Ventura Field Office 2151 Alessandro Dr, Suite 110  
Ventura, Ca. 90731

Subject: Port of Los Angeles, San Pedro  
Waterfront Project Draft EIS/EIR

Dear Dr. MacNeil:

Our organization obtained a copy of the subject EIS/EIR and have the following comments. The proposal locates the SS Lane Victory in the North Harbor water cut (Figure 2F) which establishes its position to be very narrow with limited access to the vessel. With this plan, it is impossible to have a tug come alongside the ship to tow it out for a voyage. The ship requires two tugs at the end of a voyage.

The plan indicates approximately 16 car parking spaces. For the SS Lane Victory to remain economically viable, we need significantly more parking space. During our summer cruises, we take aboard approximately 700 passengers each voyage. They require parking spaces. We have movie or TV shoots, their equipment requires space. We are a training platform for the Harbor and Los Angeles Police and Fire departments, police dogs are trained for drug interdiction Homeland Security uses us for training also. Each of these activities require parking space for their vehicles Boy Scouts and Sea Cadets are quartered aboard for week end training and they require dock space for their gear prior to boarding.

We appreciate the opportunity to comment on this project.

Sincerely,

Donald Knight  
President  
Merchant Marine Veterans WW11.

A non-profit tax exempt 501-C-3 corporation • Serving Merchant Marine Veterans from W.W. II, Korea, Vietnam  
S.S. Lane Victory • Berth 94, San Pedro, California  
P.O. Box 629, San Pedro, California 90733-0629 • Ph. (310) 519-9545 • Fax (310) 519-0265