

Group 2 Organizations

1. Pacific Corridor Community Advisory Committee
2. Pacific Corridor Community Advisory Committee
3. Pacific Corridor Community Advisory Committee
4. South Bay Association of Chambers of Commerce
5. Croatian American Club
6. Coalition for a Safe Environment
7. Long Beach Area Chamber of Commerce
8. Long Beach Area Chamber of Commerce
9. Northwest San Pedro Neighborhood Council
10. Marine Clerks Association Local 63

PACIFIC CORRIDOR COMMUNITY ADVISORY COMMITTEE
San Pedro Municipal Building, 638 South Beacon Street Suite 551
San Pedro, California
December 4, 2008

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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

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CHAIRPERSON**
Mary Jo Walker

SECRETARY
*Elizabeth
Schindler-Johnson*

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

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Phillip Trigas
Laureen Vivian*

Subject: 2008 Waterfront Project Draft EIS/EIR

Dear Dr. MacNeil and Dr. Appy:

The Pacific Corridor Community Advisory Committee (CAC) is responsible for advising the City of Los Angeles Community Redevelopment Agency (CRA) on projects that impact the redevelopment project areas. The Project Area encompasses the San Pedro Historic Business District and surrounding residential area adjacent to the LA Waterfront, generally west of Harbor Blvd, from Channel Street to 22nd Street and west to Gaffey Street.

The CAC opposes going forward with the Proposed Project and recommends moving forward with Alternative Development Scenario 4, with the Cruise Industry expanded adjacent to Downtown. The key is that the Waterfront should be focused on enhancing Downtown and the linkages to the Waterfront. The priority is for all improvements to be completed adjacent to Downtown first. Specific issues of concern are raised in Attachment #1. The CAC original concerns were spelled out in our official comment letter for the Notice of Preparation dated February 27, 2007 which is attachment 2 and we do not feel were appropriately studied.

Red Car Line Extension

The line's first expansion should be routed through Downtown San Pedro. At a minimum it should be routed west on 5th Street to Centre Street, south on Centre Street to 7th Street and east on 7th Street to return to the main line. This was promised to the community and should be of the highest priority.

Road Improvements

The CAC does not support realigning Harbor Boulevard, as disconnecting the 5th Street and 6th Street access to the Maritime Museum and Ports O' Call will create another barrier between Downtown and the Waterfront. The Port has not included any off Port mitigations for the severe traffic impacts that the Project will impose on the community. The Port should be responsible for mitigating all impacts in the community for increases in traffic or congestion.

Parking Structures

No parking structures should be built on the Waterfront. Any parking structures should be built for shared use with Downtown and linked by the Red Car through Downtown to the Waterfront. There has been no charge for parking on the Waterfront for 50 years, except for the cruise terminals. Charging for parking will act as a barrier to enhancing public access to the Waterfront.

Ports O' Call Development

Redevelopment of Ports O' Call is a major element of the San Pedro Waterfront Project and the CAC is very concerned that 375,000 of new retail & restaurants will detrimentally impact the Downtown. The DEIR fails to adequately assess the impact on Downtown does not provide any mitigation off Port property to remedy the impacts. As recommended by the Urban Land Institute and Councilwoman Janice Hahn, the historic landmark institutions that have been serving the community for almost fifty years - the San Pedro commercial fishing slips, Ports O' Call Restaurant and San Pedro Fish Market should be retained.

- I. Minimum threshold for mitigation should be maintaining the existing conditions of traffic and air quality.
- II. Fund should be allocated for acquisition and relocation of property at impacted intersections for traffic improvements and sites for new mixed use developments.

The CRA Community Advisory Committee's commitment to improve our Project Area is our highest priority. The San Pedro Waterfront Project, Alternative 4 with improvements and phasing of projects that enhance Downtown first will assist the community in these efforts.

Sincerely,



Mary Jo Walker, Vice Chairperson
CRA Pacific Corridor Community Advisory Committee

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 directions 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 in2037.

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, 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.

SP WF DT 10 December 2008

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San Pedro Municipal Building, 638 South Beacon Street Suite 551
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Dr. Ralph G. Appy
Director of Environmental Management
Port of Los Angeles, Harbor Division
425 South Palos Verdes Street
San Pedro, California 90731

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

Dear Messrs: Appy and MacNeil:

This letter is to acknowledge that the Pacific Corridor Community Advisory Committee (CAC) supports the Central San Pedro Neighborhood Council's responses to POLA's San Pedro Waterfront Project.

The members of the CAC have thoroughly reviewed and discusses the items outlined in the letter and agree with their recommendations.

Respectfully,

Mary Jo Walker, CAC Vice Chairperson



Central San Pedro Neighborhood Council



November 18, 2008

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

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

Subject: Response to POLA's San Pedro Waterfront Project

The Central San Pedro Neighborhood Council (CSPNC) was created by the City of Los Angeles to advocate for the interests of the stakeholders in downtown San Pedro. Since our inception in 2002, we have consistently supported the redevelopment of the waterfront to serve residents, local business interests, and all who have a stake in the Los Angeles waterfront. We see this redevelopment as being essential to improving the quality of life for residents, the local economy, and providing good stewardship of our precious waterfront resources.

Upon review of the San Pedro Waterfront Project DEIR released in September of 2008, we have come to the conclusion that the Port's Alternative 4 with certain modifications best meets the goals of our stakeholders. As decided by official action of CSPNC on November 18, 2008, we strongly support moving forward with Alternative 4, and provide the following additional comments to clarify the conditions of our support:

1. All passenger terminals serving the cruise industry should remain concentrated in the downtown area. The Port needs to make a significant investment in the downtown cruise terminal complex as this is situated at the visitor entrance to our waterfront and should be a significant architectural landmark. The existing Berth 93 terminal building is in great need of renovation, and the expansive parking lots fronting it are an eyesore. The renovation or reconstruction of the existing terminal buildings along with the construction of needed ancillary structures should occur in the near future to stimulate waterfront redevelopment and to generate interest among other potential investors. The development of pedestrian-level uses that take advantage of the plaza at the new Swinford water feature should also be a priority. Although the creation of a new North Harbor is appealing, this should not be allowed to take away from the acreage needed to establish an attractive and functional world-class cruise passenger terminal.

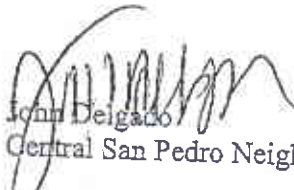
2. We agree with other community organizations that find large parking lots on the east side of Harbor Boulevard to be both a waste of prime waterfront property and a barrier to our connection with the waterfront. Off-site structured parking should be built as needed west of Harbor Boulevard in such a manner as to be available for the joint use of cruise passengers and other downtown visitors. We urge the Port to consider providing multi-level structured parking at the site of the Boys and Girls Club surface parking lot, at the Caltrans' Beacon Street parking lot (either in partnership with Caltrans or by purchasing this lot from them), or at one of the Community Redevelopment Agency's downtown opportunity sites. We also support the development of parking structures along the rail yard bluff as proposed by the Port. Any prime parking retained on the cruise terminal complex should be architecturally integrated with redeveloped terminal buildings to be attractive and to retain views of the waterfront.
3. We are especially enthusiastic about the construction of the waterfront promenade, the proposed Downtown Harbor, the 7th Street Harbor, the 7th Street Pier, the Town Square fronting the Maritime Museum, and the pedestrian bridge linking the community at 13th and Beacon Streets to the waterfront. The completion of these projects will do much to generate waterfront excitement and link the community to the waterfront, and should be made a high priority for early completion.
4. The proposed reconfiguration of the connection between Harbor Blvd and Sampson Street, eliminating the 6th Street connection in favor of a streamlined, freeway-like intersection designed to move large quantities of private vehicular traffic from Harbor Boulevard onto the primary waterfront thoroughfare, is a poor plan that neglects its role in providing a key linkage to downtown San Pedro. This intersection, over 300 feet long, would be less safe and not function as well, traffic-wise, as a tried and true compact 90-degree intersection. More importantly, it squanders an unnecessarily large area for roadbed, does not respect our urban-grid formula, and severs a vital connection between downtown and the waterfront. We ask the Port to go back to the drawing board and connect Harbor Boulevard and Sampson Way with a 7th Street extension.
5. We wholeheartedly support the Port's efforts to redevelop and repurpose the Ports O'Call property in order to maximize the benefits which should accrue to this central parcel of waterfront property. Firstly, we ask that redevelopment focus on providing additional regional attractions which do not compete with our downtown economy or cause negative impacts on our stakeholders. While determining how to best meet this goal, we feel it essential in terms of sustainability that the existing key tenants of Ports O'Call who are successful in terms of the numbers of visitors and local customers they serve should be supported with the improvements they need to continue to be successful. We note that the current DEIR simply specifies a certain number of square feet of new development, but we ask the Port to be wary of a generic, developer-created plan that provides standard commercial opportunities without the investment of vision that should be dedicated to a prime waterfront resource. Both urban planning experts and the community should be consulted as to what the highest and best use of this property might be prior to seeking developer proposals for a new master plan. Finally, as we must recommend the elimination of the North Harbor watercut in order to optimize the Downtown Cruise Terminal, we

suggest that "tugboats, visiting historic and naval vessels, and the SS Lane Victory" be located in either the Downtown Harbor or along the Ports O'Call waterfront in order to keep these essential services and attractions prominently positioned along our waterfront.

6. With respect to the proposed conference center in Ports O'Call, we ask that the Port do all that is possible to place this needed facility at a waterfront location that is integrated into a visionary master plan for waterfront redevelopment. We note that these large facilities have the potential to create a zone of relative inactivity when sited within a regional tourist-serving attraction. A water-view location closer to downtown with integrated parking facilities is most desirable. We ask the Port to consider locating it atop the proposed bluff-fronting parking structures.
7. Finally, we have these concerns about three major elements that were NOT included in the DEIR:
 - a) The Port should meet its commitment to linking downtown to the waterfront by extending the Red Car line or providing some other attractive form of public transport that connects downtown to the 6th Street Red Car station.
 - b) The City of Los Angeles Community Redevelopment Agency has been advocating for linkages between downtown and the waterfront that include a partnership between their organization and POLA for the creation of a joint use parking structure on one of their downtown opportunity sites. Providing downtown parking options for cruise passengers would encourage these visitors to enjoy San Pedro before being shuttled off to the cruise terminal.
 - c) The much discussed Maritime and Marine Science Research Center should be included in the Port's master planning for the waterfront, as this single institution alone has a tremendous potential for positive impact on our economy and the long-term sustainability of the region.

We hope that the Port of Los Angeles will take these comments from the official City of Los Angeles-sanctioned representatives of the stakeholders of downtown San Pedro to heart, and incorporate them into their plans for a truly great waterfront for the City of Los Angeles.

Sincerely,


John Deigato
Central San Pedro Neighborhood Council President

cc: Dr. Geraldine Knatz, POLA Executive Director, P.O. Box 151, San Pedro, CA 90733-0151
Mr. S. David Freeman, President, Los Angeles Harbor Commission;
Mayor Antonio Villaraigosa, 200 North Spring Street, Room 303, Los Angeles, CA 90012
Hon. Janice Hahn, 638 S. Beacon St., Suite 552, San Pedro, CA 90731
Camellia Townsend, San Pedro Chamber of Commerce, 390 West 7th Street, San Pedro, CA 90731
CSPNC Boardmembers

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San Pedro Municipal Building, 638 South Beacon Street Suite 551
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Dr. Spencer D. MacNeil
U. S. Army Corps of Engineers,
Los Angeles District
Regulatory Division, Suite 110
Ventura, California 93001

Dear Messrs: Appy and MacNeil:

This letter is to acknowledge that the Pacific Corridor Community Advisory Committee (CAC) supports the Letter of Support sent to you from the San Pedro Peninsula Chamber of Commerce, in responses to POLA's San Pedro Waterfront Project.

The members of the CAC have thoroughly reviewed and discusses the items outlined in the letter and agree with their recommendations.

Respectfully,

Mary Jo Walker, CAC Vice Chairperson



December 2, 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
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731

Dear Dr. MacNeil and Dr. Appy:

The San Pedro Chamber of Commerce has, for over ten years, been the leading advocate for redevelopment of the waterfront and expansion of the cruise industry. Ever since John Papadakis proposed the "Grand Promenade" from the bridge to the breakwater, it has been viewed as the backbone of a revitalized downtown San Pedro, when linked to the waterfront with ribs consisting of pedestrian and public transportation bridges.

The Chamber's mission is to make San Pedro an economically, environmentally, and socially sustainable community. That means we look for any new developments to:

1. Enhance our current economic assets, while adding new ones.
2. Create or attract new jobs with good wages and career growth opportunities.
3. Enhance our current environmental assets, mitigate past environmental problems, and add new assets.
4. Create new educational and recreational resources.

These principles have been applied to our evaluation of the 2008 Waterfront Project Draft EIS/ EIR. After review by the Chamber's Waterfront Subcommittee, Economic Policy Committee; and with input from significant community organizations; the Board of Directors recommends and strongly supports moving forward with **Alternative Development Scenario 4, with minor modifications.**

As preface to the comments that follow, we would like to emphasize that, a.) none of the following comments should be construed to indicate that we advocate or support re-circulating the Draft EIS/EIR, b.) as waterfront development proceeds, all Downtown elements should be included in the first phase, and c.) we have made it a priority to incorporate the comments of other significant community organizations.





Elements supported as stated in Alternative 4:

1. Waterfront promenade
2. Inner Harbor Cruise Berths
3. No Outer Harbor Cruise Passenger parking
4. New Harbors
 - a. Downtown Harbor with Los Angeles Maritime Institute Facilities
 - b. 7th St. Pier
5. Conference Center
6. Three New Waterfront Parks
7. SS Lane Victory
8. Red Car Maintenance Facility and Museum
9. Ralph J. Scott Fire Boat Museum
10. Catalina Express

Elements supported with modifications:

1. Parking Structures:

- a. The one new Inner Harbor Cruise Passenger Parking Structure should include ground floor restaurants and retail to enhance the pedestrian experience adjacent to the Gateway Fountain.
- b. Any additional parking structures should be located for shared use between the downtown and waterfront districts.

2. Ports O' Call Development

Redevelopment of Ports O' Call is a major element of the San Pedro Waterfront Project and the Chamber recommends:

- a. Emphasis be placed on connecting Ports O' Call to the downtown through a seamless connection, including extension of the Red Car into downtown (see below).
- b. As recommended by the Urban Land Institute and Councilwoman Janice Hahn, the historic landmark institutions that have been serving the community for almost fifty years - the San Pedro commercial fishing slips, Ports O' Call Restaurant and San Pedro Fish Market - should be retained.
- c. 50,000 square feet of new development be added to the current 150,000 square feet at Ports O' Call.

3. Red Car Line Extension

The line's **first** expansion should be routed through Downtown San Pedro. At a minimum it should be routed west on 5th Street to Centre Street, south on Centre Street to 7th Street and east on 7th Street to return to the main line. This was promised to the community and should be of the highest priority.





4. Road Improvements

The Chamber does not support realigning Harbor Boulevard, as disconnecting the 5th Street and 6th Street access to the Maritime Museum and Ports O' Call will create another barrier between Downtown and the Waterfront. The Chamber does support the Town Square and Fountain elements of the project. The only roadway improvement that the Chamber supports is the extension of 7th Street due east to Sampson Way at the foot of the proposed 7th Street Pier.

Additions to Alternative 4

Three major elements advocated by the Chamber and entered into the record at the EIR Scoping Hearing and not included in the DEIR should be studied.

1. Marine Science Research Institute

This should have been included in the DEIR, beginning with adaptive reuse of the warehouses at Berth 58-60.

2. Clean-up of the Westways site

This should be a high priority with the Port.

3. Outer Harbor Cruise Berth

The Port should continue to plan for the availability of an occasional-use berth at Kaiser Point while the inner harbor terminal remains the focus of passenger processing activities.

The Chamber appreciates the Port of Los Angeles' continued commitment to moving forward on the San Pedro Waterfront Project and looks with the Port to continue making progress on vital project.

forward to working
this exciting and

Sincerely,

John Ek
Chairperson, Board of Directors

Camilla Townsend
President/CEO





SOUTH BAY ASSOCIATION OF CHAMBERS OF COMMERCE

Serving 16 Chambers of Commerce and over 53,000 Businesses in Southern California

3400 Torrance Blvd, Suite 100
Torrance, California 90503
www.SBACC.com

December 3, 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

Subject: San Pedro Waterfront Project

Dear Dr. Spencer D. MacNeil and Dr. Ralph G. Appy:

The South Bay Association of Chambers of Commerce (SBACC) supports the proposed San Pedro Waterfront Project provided that local concerns regarding traffic, parking, and downtown San Pedro business access and exposure as well as regional transit solutions such as the Harbor Subdivision line that the Los Angeles County Metropolitan Transportation Authority (Metro) has under study are considered in the final plan.

We believe that the proposed project is vital to the area's business community and local economy. The proposed project is estimated to create over 1,000 new jobs and much more as the cruise ship industry is expected to expand. With more jobs coming on line in the San Pedro area, this can only be a positive start to an already slumping economy in both our area and statewide.

The SBACC also sees the need for a transportation related solution in and around the proposed project. By considering Metro's Harbor Subdivision line and coordinating efforts with Metro to ensure reliable methods of transportation to the waterfront, we believe this will enhance the overall project. As the area begins to flourish after completion, the need for reliable transportation to and from the proposed waterfront will be crucial to the continued growth of the project. The surrounding community, along with local businesses, will need to depend on this transportation solution as way to continue to attract visitors and tourism to the waterfront as proposed in the current project.

We strongly believe the San Pedro Waterfront Project is long overdue and by approving the proposed draft EIR/EIS will be a step in the right direction which will benefit all involved.

Sincerely,



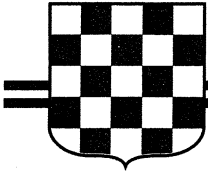
Helen Duncan
2008 Chair

CC:

State Senator Alan Lowenthal 916-327-9113
State Senator Jenny Oropeza 916-323-6056
Assembly Member Bonnie Lowenthal 916-319-2154
Assembly Member Warren T. Furutani 916-319-2155
Assembly Member Ted Lieu 916-319-2053

Assembly Member Curren D. Price Jr. 916-319-2151





Croatian American Club

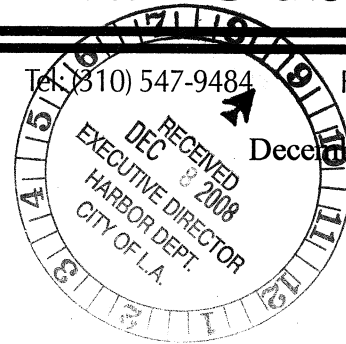
631 West Ninth Street

San Pedro, CA 90731

Tel: (310) 547-9484

Fax: (310) 547-3625

San Pedro Waterfront Project



December 1, 2008

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

Dear Dr. Appy:

Our Board of Directors has received and reviewed the EIR package in regards to the San Pedro Waterfront. We have evaluated the alternatives and have seen other proposed plans and overwhelming support the Port of LA's Proposed Project. The Proposed Project is the best option amongst all that we have examined.

Croatians began immigrating to Los Angeles in great numbers at the end of the 19th century. On San Pedro's bluffs, we found a landscape that resembled the sun-kissed islands and inlets of the Dalmatian Coast. And in the waters off the harbor, we fished as we had for generations in the crystal blue waves of the Adriatic Sea. Today there are reportedly over 40,000 people of Croatian ancestry who make the harbor area their home. The Croatian American club has been established for people of Croatian descent to gather and socialize. Our organization is very active in the San Pedro community and annually we hold a picnic in front of our clubhouse where we entertain over 10,000 visitors.

We are proud people, proud of our heritage and proud of our surroundings. Two most noted Croatian-Americans who made huge contributions to the harbor area are former California assemblyman Vincent Thomas who was instrumental in getting a bridge built in our port and Martin J. Bogdanovich who founded Star-Kist Tuna. Unfortunately, throughout the years the fishing industry has left us and with this many of our jobs have gone.

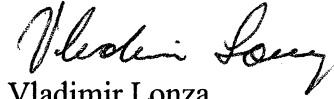
We strongly support the Port's proposed plan for countless reasons like the creation of new jobs and the revitalization of our depressed waterfront area. Ports O' Call used to be a destination but it is no longer. We support the idea of getting a developer to redevelop the whole Port O' Call area which in turn will bring new and exciting businesses.

We also need a world class cruise ship terminal in the outer harbor that can accommodate the larger ships. We would love to see an operator like Disney at this new facility. We believe that many people would drive on Harbor Boulevard to the outer harbor and see what San Pedro has to offer. We are concerned that the existing facility would not accommodate the newer ships and we could lose what's left of our cruise ship industry. We need these jobs!

We support the continuous promenade to Cabrillo beach, the new harbors, the downtown square, the red car extension and everything else that has been proposed.

Our board members have seen many presentations throughout the years in regards to redeveloping the San Pedro Waterfront. Many board members including myself have attended public meetings and have made comments. All for not! Many of us attended the fountain ground breaking ceremony where well over 5,000 people attended. We are tired of talking – the Port has a great plan and must start building it now while many of us are still alive to enjoy it.

Sincerely,



Vladimir Lonza
President

CC Los Angeles City Mayor Antonio Villaraigosa
CC Dr. Geraldine Knatz
CC S. David Freeman
CC Joe Radisich

From: Appy, Ralph
Sent: Monday, December 08, 2008 6:29 PM
To: GreenRebstock, Jan
Subject: FW: San Pedro Waterfront Project DEIR/DEIS Public Comments

From: Jesse Marquez [mailto:jnmarquez@prodigy.net]
Sent: Monday, December 08, 2008 5:05 PM
To: Appy, Ralph
Cc: spencer.d.macneil@usace.army.mil
Subject: San Pedro Waterfront Project DEIR/DEIS Public Comments

Respectfully Submitted

Jesse N. Marquez
Executive Director
Coalition For A Safe Environment
P.O. Box 1918
WilMington, CA 90748
310-834-1128

Coalition For A Safe Environment

P.O. Box 1918, Wilmington, California 90748
wilmingtoncoalition @ prodigy.net 310-834-1128

December 10, 2008

Port of Los Angeles (POLA)
Los Angeles Harbor Department
Ralph G. Appy, Ph.D., Director
Environmental Management Division
425 S. Palos Verde St., San Pedro, CA 90733-0151
rappy@portla.org
310-732-3497 R. Appy
310-732-3949 Jan Green Rebstock
310-547-4643 Fax

U.S. Army Corps of Engineers (USACOE)
Los Angeles District, Regulatory Division
ATTN: Spencer D. MacNeil, D.Env.
915 Wilshire Blvd.
Los Angeles, CA 90017
spencer.d.macneil@usace.army.mil
805-585-2149 S. MacNeil Office
213-452-3920 Public Affairs Office

Re: San Pedro Waterfront Project
Draft Environmental Impact Report (DEIR)/
Draft Environmental Impact Statement (DEIS) For
Corps File Number 2003-01029-SDM
SCH No. 2005061041
ADP No. 041122-208

Su: Public Comments

The Coalition For A Safe Environment (CFASE) wishes to submit the following public comments to the Port of Los Angeles Board of Harbor Commissioners (POLA BOHC), City of Los Angeles (COLA) and U.S. Army Corp of Engineers (USACOE).

The Coalition For A Safe Environment is an Environmental Justice Community based non-profit organization with members in Long Beach and 25 cities in California.

We find the proposed San Pedro Waterfront Project Draft Environmental Impact Report (DEIR)/ Draft Environmental Impact Statement (DEIS) to be deficient because:

1. The Section 4 Cumulative Analysis failed to include the following other local new & future construction projects:
 - a. Los Angeles Harbor College Expansion Project - Wilmington
 - b. LA Unified School District New Elementary School - Wilmington
 - c. Warren E & P New 500 Oil Well Drilling Project - Wilmington
 - d. Machado Lake Expansion & Restoration Project - Wilmington

- e. New LNG Truck Fuel Station - Wilmington
 - f. LA County Sanitation Dept. New Outfall Pipe Construction Project - Carson
 - g. New Retail Mall Project - Carson
 - h. LA Unified School District New Elementary & High School Project - Carson
 - i. Port of Long Beach New Oil Exploration & Oil Well Drilling Project
2. The Section 4 Cumulative Analysis identified categories of sensitive receptors but failed to provide an estimation of the number of sensitive receptors:
 - a. In order for the public to have an understanding of the magnitude of impacted sensitive receptor children and adults.
 - b. In order for the Port to know exactly what number of sensitive receptors will be negatively impacted and what type of mitigation is required.
 - c. In order for the port to estimate necessary mitigation financial resources.
 3. The Section 4 Cumulative Analysis of lighting impacts comes to the conclusion that all lighting impacts have been mitigated, the lighting plan already makes maximum use of measures and that no further mitigation is feasible which is only the opinion of the port and its consultants. There was no analysis performed to determine:
 - a. What lighting was not necessary after normal business hours.
 - b. What lighted signage was not necessary after normal business hours.
 - c. What lighting could be dimmed after normal business hours.
 - d. Could electric lighting posts be lower than standard practice.
 - e. Could florescent glow in the dark signage replace some electric lighted signage.
 - f. Could the Port replace nearby residents window curtains and shades with darker curtains and shades.
 4. The Section 4 Cumulative Analysis concludes that after the Port proposed mitigation for air quality impacts during construction that there would remain significant air quality impacts and that these emissions would exceed CEQA and NEPA baseline emissions of every toxic emissions category. The DEIR/DEIS fails to include numerous other potential mitigation measures:
 - a. Port could cease or limit construction during SCAQMD bad air quality warning days.
 - b. Port could coordinate with other area major construction projects to alternative heavy days or weeks of construction to limit air quality and public health impacts.
 - c. Port could cease or limit construction during windy days to prevent additional fugitive dust impacts. No maximum wind speed has been established.
 - d. Port did not consider what role new electric trucks, hybrid trucks and LNG trucks could play and what percentage could be phased in on project.
 - e. Port did not consider and estimate what local construction materials, parts and equipment suppliers could be incorporated into project to prevent or minimize long distance deliveries and support local harbor economy and businesses.
 - f. Port did not require or mandate what percentage of construction workers must use public transportation or live within 5 miles of the Port in order to minimize out of area long distance drivers air quality impacts and support local resident minimum or no driving requirement and hiring.
 - g. Port did not consider the use of large temporary tent structures with BACT to cover construction areas in order to limit fugitive dust and other toxic emissions released into the atmosphere.
 - h. Port did not require or mandate

5. The Section 4 Cumulative Analysis concludes that after the Port proposed mitigation for project air quality the green house gas (GHG) emission that even after mitigation the project would still produce cumulatively considerable and unavoidable contributions to global climate change under CEQA and there were no other feasible mitigation measures. The DEIR/DEIS fails to include numerous other potential mitigation measures:
 - A. The Port failed to consider and address the legal requirements of AB 32 Global Warming Solutions Act of 2006.
 - B. The Port could offset its construction and operational GHG emissions by investing in numerous potential mitigation measures on-port property an off-port property such as:
 - a. On-port Property:
 1. Purchase or lease the Advanced Control Technologies, Inc. - Advanced Marine Emissions Control System (AMECS) for cruise ships, container ships and oil/fuel/gas tanker ships.
 2. Purchase or lease the CleanAir Marine Power - Wittmar DFMV Cold Ironing System.
 3. Purchase or lease the Vycon, Inc. Regen Power System.
 4. Purchase the American MagLev Technologies - MagLev Container Transport System.
 - b. Off-port Property:
 1. Purchase and install solar power systems on top of public schools, recreational, senior care and child care facilities and hospitals.
 2. Purchase and replace old inefficient gas floor and wall heaters in residential homes and public schools for more efficient gas or electric heaters.
 3. Purchase and replace old inefficient water heaters in residential homes and public schools with solar water heaters or electric water heaters.
 4. Purchase and replace old inefficient refrigerators in residential homes and public schools with new efficient refrigerators.
 5. Offer a \$ 5,000 coupon for the replacement of an old inefficient fuel car for a newer more fuel efficient car or down payment for a new car for local harbor residents.
 6. Pay for the annual cost to repair leaking HFC's from older Port diesel trucks.
 7. Pay for the evacuation of HFC's from refrigeration units in reefer containers placed into storage in Wilmington.
6. The Section 4 Cumulative Analysis concludes that Biological Mitigation for marine mammals being impacted or killed is limited, was fully addressed, significant and unavoidable. The DEIR/DEIS fails to include numerous other potential mitigation measures:
 - a. To prevent accidental deaths to whales and mammals from being hit from ships at sea the ship lanes distance can be moved farther out to allow whales and mammals to follow the coastline undisturbed. Ships do not need close up coastal views.
 - b. Land based sound detectors could be installed to listen for passing whales and mammals and alert ships arriving and departing.

- c. Migrating whale season notification alert system to advise ships of whale season.
 - d. Ships to reduce speed to 10nm within 50nm of coastal shoreline and ports.
 - e. Prohibit ship ballast dumping and require 100% landside disposal. This will prevent the pollution, contamination and killing of whale food sources.
 - f. The Port has allowed coastal waters to be significantly polluted and contaminated from the Dominguez Channel Watershed, water runoff and public trash such as plastic bags which kills and contaminates whale and mammal food sources. The Port could install trash traps, water purification filter systems and ship water skimmers.
7. The Section 4 Cumulative Analysis concludes Biological Mitigation for fish, crustaceans and sea plant life being impacted or killed is limited, was fully addressed, significant and unavoidable. The DEIR/DEIS fails to include numerous other potential mitigation measures:
- a. Ship exhaust aerial atmospheric deposition in the form of particulate matter and VOC's contaminates and kills natural food sources in coastal and tidelands waters but is not mitigated. The Port has allowed coastal waters to be significantly polluted and contaminated from the Dominguez Channel Watershed, water runoff and public trash such as plastic bags which kills and contaminates whale and mammal food sources. The Port could install trash traps, water purification filter systems and ship water skimmers.
 - b. The Port can build fresh and salt water fisheries or sponsor an organization or company that can raise fish for replenishing the loss and depletion of sea life.
 - c. The Port can build additional seaweed and plant life reserves and bedrock islands to provide a breeding and safe area for sea life to survive. We do not support or want ships and other metal wreckage to be dumped and used for this purpose. We want natural materials such as rock to be used.
 - d. Prohibit ship ballast dumping and require 100% landside disposal. This will prevent the pollution, contamination and killing of aquatic life food sources and their habitats.
8. The Section 4 Cumulative Analysis concludes that Geological Mitigation for potential impacts on local harbor communities and the public being impacted or killed due to a tsunami or seiche is limited, was fully addressed, significant and unavoidable. The DEIR/DEIS fails to include numerous other potential mitigation measures:
- a. The Port could develop a public alarm system such as the old civil horn alarm system.
 - b. The Port could develop and distribute English and Spanish information on what the public can do in the event of tsunami or seiches.
 - c. The Port can coordinate with disaster agencies to be able to immediately distribute early warning notices and prepare to evacuate information to all Los Angeles area media outlets. In 2006 there was a warning that came out on Channel 7 asking the public to be prepared to evacuate due to a potential tsunami. Only one TV station and only two radio stations carried the warning. If you were not watching or listening to these stations you did not know of the warning.
9. The Section 4 Cumulative Analysis on Traffic concludes that there is no feasible mitigation to address local neighborhood and harbor community traffic. The DEIR/DEIS fails to include numerous other potential mitigation measures:

- a. The Port could post signs prohibiting neighborhood entry by construction workers and suppliers.
- b. The Port could post designated traffic and delivery routes.
- c. The Port could require contractor employee travel training classes.
- d. The Port could require that contractors hire a mandatory percentage of local residents to minimize out of area workers and long distance driving. Unions are fully capable of referring local resident workers and regularly accommodate special employer needs or requirements.
- e. The Port could require that contractors require that a mandatory percentage of workers use public transit transportation.

10. The Section 4 Cumulative Analysis on Traffic fails to address other public impacts such as:

- a. Degradation of public streets, highways, freeways and bridges where the public is paying for repair, maintenance and replacement of infrastructure. The Port can contribute funds to the city and state for these public incurred costs.
- b. The extra construction worker and supplier traffic requires additional city and CHP police enforcement that the Port does not serve, fund and mitigate.
- c. The extra construction worker and supplier traffic causes an increase in traffic accidents that involve and impact local residents that the Port does not fund and mitigate. These accidents:
 1. Cause temporary and permanent disabilities.
 2. Cause temporary and permanent loss of income.
 3. Cause increases in car insurance.
 4. Cause increases in health insurance.
 5. Cause increases in life and accidental insurance.
 6. Cause schools to lose funds due to missed school days by children.
 7. Cause local residents to get fired from jobs because they were late again.
- d. The extra traffic tickets impacts court staff time, police attendance time, local resident waiting time, new court house construction and police station construction costs.

11. The Section 4 Cumulative Analysis states that the increased water demands, waste water and solid waste generation would not exceed the capability and capacity of existing facilities now or in the near future. The DEIR/DEIS fails to acknowledge impacts and include numerous other potential mitigation measures:

- a. This project deprives the general public of its future servicing capability and capacity.
- b. The general public is stuck with the future maintenance, construction and expansion costs that the Port does not contribute too.
- c. The general public is stuck with land fill costs that the Port does not contribute too.
- d. The general public is stuck with the recycling program costs that the Port does not contribute too.
- e. The general public is stuck with the costs for future additional water supplies and infrastructure.
- f. The DEIR/DIES references that wastewater and storm water discharges would be regulated by NPDES permits and approved TMDL's. The Port has failed to

protect coastal waters, violates and allows violation of NPDES permits regularly and there are no TMDL's approved for the Port.

12. The Section 4 Cumulative Analysis states that the LADWP is responsible for maintaining sufficient capability to provide its customers ie. the Port. The DEIR/DEIS fails to acknowledge impacts and include numerous other potential mitigation measures:

- a. The Port construction project and operation will require additional power that was not incorporated in the planning of power needs for the city. This project will cause the public to incur future power plant and transmission lines building costs that the port does not contribute too.
- b. City of Los Angeles residents will incur increased power costs due to none residents coming to use the expanded project who do not pay the electric bill.
- c. The Port can invest in additional solar energy systems other then the 10MW its is already proposing to build.
- d. Purchase and install solar power systems on top of residential homes, public schools, recreational, senior care and child care facilities and hospitals.
- e. The Port and/or city can mandate a Port lessor utility tax or fee.

13. The Section 5 Environmental Justice states that air quality will have a disproportionately high and adverse impact on low-income and minority populations which is unacceptable and significantly unmitigated and grounds for non-approval and certification of the Final EIR/EIS. The DEIR/DEIS identifies that 55.3% of San Pedro's and 87.1% of Wilmington's population is low income and minority validating the significance of negative impacts on Environmental Justice communities and the majority of the San Pedro Waterfront Project area population. The DEIR/DEIS fails to acknowledge, identify, study and assess all negative impacts and include numerous other potential mitigation measures as were discussed in the Section 4 Cumulative Impact public comments.

14. The Section 5 Environmental Justice states that the Port will utilize special precautions of notifying each site within 30 days of their intent to begin construction near sensitive receptor sites only within 1,000 feet of construction which is not adequate. The DEIR/DEIS fails to acknowledge numerous other potential mitigation measures:

- a. Sensitive receptors sites must also include local harbor residences.
- b. Port can temporarily relocate residents and patients and pay for hotels, motels, other schools and care facilities and transportation expenses away from the Port construction.

15. The DEIR/DEIS states that there will be significant and unavoidable public health impacts which is unacceptable. The DEIR/DEIS fails to acknowledge numerous other potential mitigation measures:

- a. The Port can establish a Public Health Care Mitigation Trust Fund to fund local community clinics such as the Wilmington Community Clinic and San Pedro Harbor Free Clinic, and the Los Angeles County Harbor General Hospital.
- b. Public health care & treatment.
- c. Financial assistance to pay for health care at local clinics & county hospitals.
- d. Financial assistance to pay for health insurance.
- e. Financial assistance to pay for medical equipment.
- f. Financial assistance to pay for medical supplies.

- g. Financial assistance to pay for medical prescriptions.
- h. Financial assistance for funeral expenses.
- i. Financial assistance for short & long term convalescent care.
- j. Financial assistance for rehabilitation.
- k. Financial assistance for job retraining.
- l. Financial assistance for lost income.
- m. Financial assistance for special learning disability assistance.
- n. Funeral and burial services.

16. The DEIR/DEIS fails to acknowledge, address and mitigate the fact that there is an inadequate Port Public Emergency & Disaster Notification, Response or Long Term Care System. The Port has created no emergency funds pool, contracted no third party support services, contracted no relocation areas, contracted no food or water services etc.

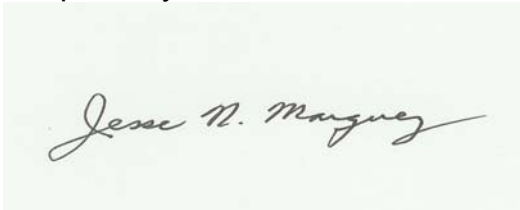
The Port has put every Harbor resident and Harbor Community in danger from its business operations. All planning that has been conducted has been to protect "Port Assets" not Harbor resident's lives and livelihoods. If there is a Port catastrophe"

- a. There are inadequate Port and City Police to protect and assist the public.
- b. There are inadequate Fire Department Personnel & Equipment to provide assistance.
- c. There are inadequate medical & hospital services & beds available.
- d. There is no relocation place for displaced families to go to.
- e. There are no emergency food & water resources for displaced families.

17. POLA responses that the Health Risk Assessment is adequate to address the public health impact issues raised is not acceptable. HRA's are not based on any local Public Health Survey or Public Health Baseline of the project area communities impacted. There is substantial health information that is not collected or known which will help determine appropriate public health mitigation.

Coalition For A Safe Environment Mission Statement is - To protect, promote, preserve and restore our Mother Earth's delicate ecology, environment, natural resources and wildlife. To attain Environmental Justice in international trade marine ports, goods movement transportation corridors, petroleum and energy industry communities.

Respectfully Submitted,



Jesse N. Marquez
Executive Director

Tom Politeo
Sierra Club - Harbor Vision Task Force



December 5, 2008

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

Dear Dr. Appy:

The Long Beach International Business Association, a committee of the Long Beach Chamber of Commerce supports the San Pedro Waterfront Project, proposed by the Port of Los Angeles because of the thousands of jobs that would be created by the project and the positive impact the increased economic activity would have on Long Beach Businesses.

Information on the project provided by the Port of Los Angeles shows the proposed project construction will provide one year of work to an estimated 7,363 individuals and help facilitate an additional 17,600 indirect jobs throughout the region. Over the five to seven year span of the construction period, the project is expected to create 7,363 direct jobs and 17,671 indirect construction related jobs, and 438 permanent jobs.

For these reasons, the Long Beach International Business Association supports the San Pedro Waterfront project.

Sincerely,

A handwritten signature in purple ink that reads "Jill A. Morgan".

Jill A. Morgan
President, International Business Association

cc: International Business Association Board of Directors



December 5, 2008

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

Dear Dr. Appy:

The Long Beach Chamber of Commerce supports the San Pedro Waterfront Project proposed by the Port of Los Angeles because of the thousands of jobs that would be created by the project and the positive impact the increased economic activity would have on businesses in the region, including the City of Long Beach.

Information on the project provided by the Port of Los Angeles shows the proposed project construction will provide one year of work to an estimated 7,363 individuals and help facilitate an additional 17,600 indirect jobs throughout the region. Over the five to seven year span of the construction period, the project is expected to create 7,363 direct jobs and 17,671 indirect construction related jobs, and 438 permanent jobs.

In addition, the new cruise terminal development portion of the project is estimated to bring in an additional \$30.8 million in cruise passenger spending that would include spending on hotels, dining and retail. The draft EIS/EIR estimates that the future economic impact of the cruise industry in the region will rise to 3,157 jobs in the region by 2037, an increase of 645 jobs over present employment. For these reasons, the Long Beach International Business Association supports the Port of Los Angeles San Pedro Waterfront Project.

Warmest Regards,

A handwritten signature in red ink, appearing to read "Randy Gordon", written over a circular red stamp.

Randy Gordon
President & CEO

cc: The Chamber's International Business Association Board of Directors

From: [Nicolay, Philip](#)
To: [Ceqacomment:](#)
Subject: Northwest San Pedro Neighborhood Council Comments to DEIR/
DEIS San Pedro Waterfront Project
Date: Monday, December 08, 2008 9:48:22 PM
Attachments: [NWSPNC San Pedro Waterfront DEIR Comment Letter.doc](#)

Attached are the comments to the San Pedro Waterfront Plan approved by the Northwest San Pedro Neighborhood Council (NWSPNC) on December 8th, 2008.

If you have any questions please contact Phil Nicolay.

Phil Nicolay
310-469-4474

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December 8, 2008

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

Dr. Ralph Appy
Port of Los Angeles
425 S. Palos Verdes Street
San Pedro, California 90733

**Subject: Comments to Draft Environmental Impact Statement/Environmental Impact
Report for San Pedro Waterfront Project
Dated September 2008**

Dr. MacNeil and Dr. Appy:

The Northwest San Pedro Neighborhood Council (NWSPNC) has consistently supported the redevelopment and improvement of the San Pedro Waterfront area from the bridge to the breakwater. We have provided comments to the Corp of Engineers and Port of Los Angeles on the Bridge to Breakwater project during the Notice of Preparation comment period for this project. Our members have participated in the development of the various project plans through attendance at scoping, PCAC, and the NOP public meetings. We have consistently provided comments about the development of the San Pedro Waterfront that have incorporated the following themes:

1. Waterfront development should enhance pedestrian and transportation linkages to downtown San Pedro.
2. Public access via walkways to and along the waterfront should be improved and extended to create a continuous promenade from the Vincent Thomas Bridge to the Federal Breakwater.
3. The scale and character of the development should be balanced between open space and commercial development in a manner that does not significantly alter the existing small town community fabric of San Pedro, and threaten redevelopment opportunities in downtown San Pedro.
4. The Port of Los Angeles No Net Increase policy should be applied to all project elements and construction.

It is in this context that the NWSPNC provides the following comments to the San Pedro Waterfront DEIR/DEIS dated September 2008.

1. The proposed project includes two new cruise ship berths at Kaiser Point (Outer Harbor), with a two story parking structure with an open space area on the roof and a multi-purpose building design that allows for community use when not needed for cruise operations. Its design should be world class. The primary need for the proposed cruise terminal is to support the next generation of larger cruise ships. According to the Port one of these newer larger cruise ships is scheduled to be home based at the Port of Los Angeles. These newer ships are too large to use the turning basin so they need to be backed into position at the current cruise terminal. Largely for traffic impact reasons, impact on adjacent water recreational uses, the desire to maintain substantial community access to the site, to draw passengers through the waterfront and near the downtown business area,

- to help support the development of other parts of the project, we are recommending the development and related infrastructure to support a single cruise berth only.
2. The creation of an Outer Harbor Park with limited commercial amenities in the proposed new terminal at Kaiser should be evaluated for multiple uses by the general public.
 3. The cruise terminal infrastructure at Kaiser Point area should be constructed and leased as joint use facility open for public use when not used for cruise operation. No exclusive use should be granted to a Cruise Line for the proposed cruise terminal.
 4. The proposed parking structure located at Kaiser Point should be scaled to serve one cruise ship terminal. The parking structure should include a park on the roof for improved view lines and passive recreation.
 5. The DEIR/DEIS discusses methods and procedures to ensure that recreational boaters in the West Channel area have access to the outer harbor when a cruise ship is berthed. We are concerned that future regulations will restrict or even close access to the West Channel while a cruise ship is berthed. Agreements with cruise lines calling on the Kaiser Point Berth should include provision to provide addition security and mitigations as need at Kaiser Point.
 6. The proposed project does not change the location of the boat launch at Cabrillo Beach. The current boat launch is safe and used by many recreational boaters. The Port does not recommend relocation of the boat launch for safety reasons such as launching small boats from vehicle trailers into deep water and the winds at other locations proposed. We do not recommend relocation of the Cabrillo Beach Boat Launch.
 7. The proposed project has multiple cruise terminals for passenger embarking and disembarking from the cruise ships. We recommend that a single check in and baggage screening are be evaluated at the Cruise Terminal located at Berths 90 to 93B.
 8. The project includes a promenade along the shore through the youth camp. We suggest the Port explore expanded uses for the area to include outdoor activities such as an urban waterfront camping experience. We support the proposed linkages, Red Car and promenade, extension to Cabrillo Beach.
 9. All cruise ships calling at the port should be required to utilize Alternative Marine Power (AMP). Should equivalents to AMP be considered, any difference between emission reductions from AMP and the proposed alternatives should be mitigated through emission reductions elsewhere in the Port.
 10. There is no discussion of the future use of the closed Westways Terminal. We urge the Port to expedite the demolition; remediation and redevelopment of the Westways Terminal. We recommend that the redevelopment plan and CEQA/NEPA evaluation be done concurrently with site demolition and remediation to reduce the time for site redevelopment and inclusion in the San Pedro Waterfront Project.
 11. The DEIR/DEIS should evaluate parking structures with roof tops near Sampson Way that are green (plants and grass) to provide activity space, viewing and access from Harbor Boulevard to the Ports of Call area.
 12. The DEIR/DEIS should consider how to link cruise ship passengers and guests to other San Pedro amenities and downtown. For example, passengers and guests using the surface and structured parking areas could be given vouchers for local restaurants and attractions as part of the parking fee. The DEIR/DEIS should include a discussion of the Red Car elements as they relate to linking

cruise ship passengers and guests to downtown and Cabrillo Beach and the Cabrillo Marine Aquarium.

13. The Port should work with the San Pedro Chamber of Commerce to establish a kiosk or greeting station at the cruise terminals to assist passengers with questions about San Pedro. This kiosk and greeting station should be incorporated into any lease agreement with a cruise ship in order to help passengers with shopping before boarding the cruise ship.
14. As part of the project construction and operation the Port needs to include a post-project validation system that implements new technologies to reduce air quality impacts as soon as possible and take advantage of advances in air pollution control technologies. In addition, a formal review should be done every year to evaluate the state of the emissions control industry and how new technologies and devices could be applied to proposed projects.
15. The project proposes significant changes to Harbor Boulevard in order to maintain and improve traffic flow. As part of the project operation the Port needs to include a post-project validation of the traffic projections. Should the actual traffic impacts be greater than expected and outlined in the DEIR/DEIS the Port should implement new traffic control measures to improve transportation within the projected area. A formal review of the traffic impacts should be done after each construction milestone has been completed.
16. Ports O'Call is presently 150,000 square feet (sf), of retail space, with approximately 80,000 sf being used currently. The proposed project would double the retail space within Ports O'Call, and additional 150,000 sf of retail space and a 75,000 sf conference center. The plan calls for the demolition and removal of the current retail establishments at Ports O'Call to allow for development of the waterfront promenade and new retail sites. We believe that the size of the development at Port O'Call should be determined by the proposed retail and commercial use, size of the proposed retail build-outs, and location of parking. We are concerned that Ports O'Call cannot be built out to 300,000 sf without an expansion of the planned parking. We also believe additional square footage cannot be supported if cruise ship parking is directed to the planned bluff-side parking. We support the Port's plan to redevelop Ports O'Call and extend the promenade along the waterfront in this area. However, given these concerns, we look forward to working closely with the Port as development plans for the Ports O'Call area are brought forward for review by the community. We also believe that the Master Plan for the proposed development in Ports O'Call be pedestrian centric rather than auto-centric, that most parking be located along the adjacent bluff, and that the development be built around a plaza(s), and landscaped open space consistent with a pedestrian-centric design.
17. An evaluation as to the collection of storm water for later usage for irrigation at Bloch Field and other open space within the San Pedro Waterfront Plan should be evaluated as part DEIR/DEIS.
18. The Port proposes modifying the Sixth and Harbor intersection to provide a smooth transition from Harbor Boulevard onto Sampson Way for access to Ports of Call and the proposed parking in the area. This traffic modification would change Harbor Blvd into a southbound one-way street southbound at Sixth Street. We support the realigned intersection to improve access to the waterfront in Port's O'Call and the parking area's proposed for the bluff area, while increasing the exposure of the waterfront and downtown business district to visitors. At the same time, in order to reduce the speedway effect of on Harbor Boulevard south of Sixth Street, we recommend traffic calming measures such as a landscaped median for the realigned Sampson Way.

19. As part of the EIR/EIS we request that the Port evaluate connecting the Bloch Field restrooms to the sanitary sewer.
20. As part of the EIR/EIS study we request that the Port evaluate remediation of soil and groundwater at Crescent and 22nd to allow for possible commercial/retail usage.
21. The Port of Los Angeles should move forward with extending the Red Car through downtown San Pedro as soon as possible.

Your consideration of these comments is appreciated.

Sincerely,

Approved December 8, 2008 by the Northwest San Pedro Neighborhood Council

Dan Dixon, President
Northwest San Pedro Neighborhood Council

Approved December 8, 2008 by the Northwest San Pedro Neighborhood Council

INTERNATIONAL
LONGSHORE &
WAREHOUSE UNION



MARINE CLERKS ASSOCIATION
LOCAL 63 LOS ANGELES and LONG BEACH HARBORS

350 WEST 5TH STREET, SUITE 200 SAN PEDRO, CALIFORNIA 90731

JAMES C. SPINOSA
PRESIDENT

December 5, 2008

Dr. Ralph Appy
Director of Environmental Management
Port of Los Angeles
425 So. Palos Verdes Street
San Pedro, California 90731

RECEIVED

DEC 10 2008

Regulatory Branch

Dear Dr. Appy:

A consortium comprising of Locals 13, 63, and 94 of the International Longshore and Warehouse Union (ILWU) proposes to construct and install a memorial – a monumental work of public art as a part of the proposed San Pedro Waterfront Redevelopment Plan.

The work will serve several purposes: it will be a memorial dedicated to the young people of the community in memory of the numerous longshore workers who lost their lives while working at the Ports of Los Angeles and Long Beach, and it will honor the dock workers who continue to facilitate the daily movement of goods through the ports along San Pedro Bay.

Equally as important, the memorial will honor past and future recipients of ILWU memorial scholarships, a fund established 21 years ago to provide college scholarships for local high school students.

The Union envisions the memorial as a focal point for either a passive or active park setting.

The ILWU believes that the proposed memorial is consistent with the California State Lands Commission Public Trust Doctrine in several ways

- The proposed memorial preserves open space and is intended to foster the public's understanding of and appreciation for the Port of Los Angeles and its relation to the community.
- The proposed memorial will have statewide impact.

The ILWU fully anticipates that when completed this work of public art will be a state landmark.

The Union expects it to be regarded as a classic, a destination of art lovers who live in or are visiting the Los Angeles area and for those from throughout California who wish to gain a greater appreciation for the importance of the work carried out of the port.

The ILWU memorial will use art, education, and community building to help mitigate the aesthetics of port operation. It will serve as a connecting point between port and community, a symbol of cooperation as both parties strive to achieve economic and environmental sustainability.

Rather than blocking or denying the visual reality of the Port, the memorial will give it a new aesthetic context, literally framing it in a series of shapes that will help people see it in a new way.

The ILWU memorial would not be a new idea to the San Pedro Waterfront Redevelopment plan. Groundbreaking for the ILWU public work of art was scheduled for June of 2007. However, a change in port administration put the planned project on hold.

Knoll Hill has been considered as a possible site for the ILWU memorial. However, the yet unsettled issue of Knoll Hill becoming a permanent home for a variety of athletic uses gives the Union little hope of utilizing that area.

As a consequence, the ILWU would like as an option to revisit the original site allocated by the Port (an area just south of Block Field) or any other appropriate site in the San Pedro Redevelopment Project area.

The Union is anxious to share its thoughts and enthusiasm for the memorial with all interested parties.

Should you have questions, please call me at (323) 265-8837.

Sincerely,



Domenick Miretti, Ph.D.

ILWU Memorial Project Coordinator

cc: ILWU Presidents

Joe Cortez, Local 13

James Spinosa, Local 63

Daniel Miranda, Local 94

Spencer MacHiel, U.S. Army Corps of Engineers

Joseph Radisich, Harbor Commissioner

David S. Freeman, Harbor Commissioner

ILWU Memorial Proposals

The proposed ILWU Memorial is to serve as a monument to the memory of the longshore workers lost on the waterfront. It is to be dedicated to the young people in the port communities of the Los Angeles, San Pedro, Wilmington and Long Beach, in order to create a common ground and unifying force for all ages to honor, and remind us of the real presence and cost of human life on the waterfront. The memorial will also honor the past ILWU college scholarship recipients and therefore serve as inspiration to younger generations for their future educational endeavors.

In Mineko Grimmer's two proposals we see monuments sited on a prominent hillside and in a park-like setting amidst the urban community where they survey the entire waterfront harbor and Pacific Ocean views. They encourage and invite visitors to be both introspective and uplifted by the spirit of such positive interaction between man and nature. The honest simplicity of Grimmer's materials are chosen from the physical structures and landscaping elements of the Port itself. The stone, steel and the disarticulated containers have been reconstructed in the proportions of the originals, but in new shapes and configurations.

The forms of the two proposals reflect on those of spiritual history. The proposal with the vertically oriented forms recall the picturesque ruins of 16th century abbey's in Briton and Wales while employing the organic suggestions of growth and renewal in nature. It invites the viewer to walk under and through the mammoth forms and consider the shapes, light and shadows within the structure, all the while sensing and seeing the presence of the Port.

The second proposal which is horizontally oriented, suggests a more solemn and meditative environment as if encountering the Eastern influence of the Pacific Rim. The open structures invite us to sit, rest and contemplate, while the parabolic curves of the roofs echo the cables of the Vincent Thomas Bridge and the broadly curved walls are reminiscent of the waves of the Pacific.

Simple, graceful, timeless. These adjectives describe the multiple and abstract readings of the proposals of Mineko Grimmer for the ILWU. Her designs wed art to nature, memorial to inspiration, and ameliorate urban stress with an aesthetic vision of a peaceful retreat that unites communities and reflects on poignant journeys and endless possibilities.

Mineko Grimmer is a Japanese-American artist living and working in Los Angeles. Her sculptures have been exhibited throughout the United States and Japan.

TIMELINE FOR ILWU MEMORIAL:

Concept Introduction: 19 th Annual Seafood Propeller Club Seafood Feast:	June 14, 2006
Ground Breaking Ceremonies: To coincide with 20th Anniversary of Seafood Feast	June 2007

