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Dr. Spencer D. MacNeil  
U.S. Army Corps of Engineers, Los Angeles District, Regulatory Brach (USACE)  
2151 Alessandro Drive, Suite 110  
Ventura, CA 93001

Dr. Ralph Appy  
Los Angeles Harbor Department (LAHD)  
425 South Palos Verdes Street  
San Pedro, CA 90731

Sent via email: [ceqacomment@portla.org](mailto:ceqacomment@portla.org)

Subject: Comments to the Draft Environmental Impact Report  
Proposed Wilmington Waterfront Development Project

Dear Dr. MacNeil and Dr. Appy:

On behalf of the Community Redevelopment Agency of the City of Los Angeles (CRA/LA), I am pleased to submit our comments regarding the Draft Environmental Impact Report (DEIR) for the proposed Wilmington Waterfront Development Project (Project). The Project has the potential to be a catalytic development for the entire Wilmington community by achieving the Port of Los Angeles' objective of "enhancing the livability and economic viability of the Los Angeles Harbor", an objective that is closely aligned with the CRA/LA Los Angeles Harbor Industrial Center Redevelopment Plan. Below you will find our comments to the DEIR, which are meant to further our mutual revitalization efforts in the Wilmington Community.

#### **Project Description:**

- The Project Site and Surrounding Uses Sections in the DEIR do not fully describe the physical and social surroundings of the project, such as the proximity of the Project to residential neighborhoods and the Avalon commercial corridor, which is downtown Wilmington's "Main Street". Although the location of the Wilmington Industrial Park on the northeast corner of the Project is called out, there is no mention that this is a CRA/LA Project Area. These sections should be revised to include a better contextual analysis in order to fully assess potential impacts to residents, businesses, and the CRA/LA Project Area.

### **Impacts to Aesthetics:**

- Renderings of the Observation Tower have continued to evolve through the Port of Los Angeles' (POLA) efforts to engage the community in the design process. Because of this, the renderings are at a conceptual stage. Since the construction of a 200 foot high observation tower at the waterfront could have an aesthetic impact to our adjacent Project Area, the CRA/LA recommends that POLA also involve CRA/LA Staff and our Wilmington Industrial Park Advisory Committee on the final design of the Observation Tower.
- It is unclear whether the Project includes street improvements on both sides of C Street along Avalon Development District A. One-sided improvements along C Street from Lagoon to Broad Avenue would create an unfinished appearance that could have an aesthetic impact to our adjacent Project Area. Therefore, CRA/LA recommends that landscape and streetscape improvements be included on both sides of C Street and undertaken in such a manner to minimize potential construction impacts to our Project Area.

### **Impacts to Traffic:**

- The realignment of Broad Avenue in conjunction with the proposed street vacation of Avalon Boulevard, south of A Street, could have traffic and circulation impacts to our adjacent Project Area. There are few project details regarding the proposed realignment of Broad Avenue, but in the Executive Summary this element is determined to have been analyzed at a Project-level. Therefore, CRA/LA recommends that these Project elements, particularly the realignment of Broad Avenue, be changed to Programmatic-level analysis in the DEIR, requiring additional site-specific environmental review at the time of implementation. In addition, POLA should closely work with CRA/LA staff to ensure that these Project elements have minimal impact on our adjacent Project Area especially during construction.
- The realignment of Broad Avenue could also impact pedestrian circulation and safety from our Project Area to the proposed Wilmington Waterfront Development Project. Consequently, CRA/LA recommends that additional environmental review of the realignment of Broad Avenue is conducted and mitigation measures that reduce vehicular/pedestrian conflicts at the corners of Broad Avenue and Harry Bridges Boulevard and Broad and C Street are incorporated.

### **Impacts to Land Use:**

- It is our understanding that the Department of City Planning plans to begin the New Community Plan Program for Wilmington-Harbor City, which would include the area listed as Avalon Development District A in the DEIR. This Community Plan process could result in land use changes that would impact the proposed use of this area for green technology business. Therefore, language changes in the DEIR should be incorporated that indicate the possible use of this area for green technology businesses.

Thank you for the opportunity to review the DEIR for the Wilmington Waterfront Development Project and the CRA/LA looks forward to our continued partnership in the redevelopment and revitalization of the Wilmington community. Please provide the CRA/LA staff with five (5) copies of the Final EIR/EIS, once it has been completed. Should you have any questions related to the CRA/LA and its redevelopment activities, you may contact me at 213-977-1744.

Sincerely,

A handwritten signature in blue ink that reads "Susan G. Totaro for".

Barron McCoy  
Regional Administrator (Harbor Region)

cc: Pauline Lewicki, Principal Planner  
Susan Totaro, Project Manager  
Megan Hunter, City Planner  
File  
Records