

3 December 2008

U.S. Army Corps of Engineers, Los Angeles Dist.
Regulatory Division, Ventura Field Office
ATTN: Dr. Spencer D. MacNeil
2151 Alessandro Dr., Ste. 110
Ventura, CA 93001

Los Angeles Harbor Department
% Dr. Ralph G. Appy
425 S. Palos Verdes St.
San Pedro, CA 90731

SUBJECT: Comments on the Notice of Availability/Notice of Completion (NOA/ NOC) for a Draft EIS/EIR for the San Pedro Waterfront Project

Dear Dr. MacNeil and Dr. Appy:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the Draft Environmental Impact Study/Environmental Impact Report (DEIS/EIR) for the above-mentioned project. We have reviewed the DEIR and attended the public hearing held on October 27, 2008, and we share many of the concerns about the proposed project that were expressed by Los Angeles City Councilwoman Janice Hahn and other speakers, to wit:

1. The Ports o' Call area is in dire need of renovation and rehabilitation. However, in so doing, existing visitor-serving businesses should not be disrupted or displaced, to the maximum extent practicable. The Ports o' Call Restaurant and other long-established visitor-serving businesses are a part of the San Pedro waterfront community. The City of Rancho Palos Verdes would be disappointed to see these local landmarks eliminated and replaced by generic, mass-market restaurants and shops that are not reflective of the character and history of San Pedro. We also agree with Councilwoman Hahn's comment that prime, waterfront real estate should not be devoted to parking structures.
2. The cruise ship industry is clearly a major economic driver in the waterfront area, and the success of this industry can have positive effects upon the larger regional economy of the communities surrounding the Port of Los Angeles. However, we are concerned that the proposal to construct a second cruise ship terminal in the Outer Harbor is not the most efficient and environmentally-sensitive means of accommodating the future growth of this industry. The City of Rancho Palos Verdes believes that expanding and consolidating the existing cruise ship facilities in the Inner Harbor—as depicted in Project Alternative 4—

would eliminate the need for redundant parking and passenger-processing facilities at two (2) separate locations, as is currently proposed. Eliminating the proposed second cruise ship terminal at Kaiser Point would also minimize aesthetic impacts upon Cabrillo Beach, and avoid maritime safety and security conflicts with the West Channel marina.

3. Several speakers at the October 27th hearing requested the consideration of a "Sustainable Waterfront Plan" as an alternative to the proposed project. Such a plan could provide improved pedestrian, vehicular and transit linkages between the waterfront area and other portions of San Pedro; could provide greater environmental benefits to the community in terms of habitat restoration, improved air quality and greater energy efficiency; and could be less expensive and quicker to implement than the proposed project. As such, the City of Rancho Palos Verdes supports the analysis and inclusion of a "Sustainable Waterfront Plan" alternative in the DEIS/EIR, as suggested by the L.A. Waterfront Working Group and other speakers at the October 27th hearing.

Again, thank you for the opportunity to comment upon this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5228 or via e-mail at kitf@rpv.com.

Sincerely,



Kit Fox, AICP
Associate Planner

cc: Mayor Clark and City Council
Carolyn Lehr, City Manager
Joel Rojas, Director of Planning, Building and Code Enforcement