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Dr. Ralph Appy
Director of Environmental Management
Los Angeles Harbor Department (LAHD)
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San Pedro, CA 90731

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Subject: Comments to the Draft Environmental Impact Report
 Proposed San Pedro Waterfront 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 San Pedro Waterfront Project Area (Project). The Port of Los Angeles' project objectives of increasing public access to the waterfront and providing connections between the waterfront area and the San Pedro Community are closely aligned with those of the CRA/LA Beacon Street and Pacific Corridor Redevelopment Project Areas. Below you will find our comments to the DEIR, which are meant to further these common objectives and enhance the ongoing revitalization efforts in San Pedro.

Project Description:

On the whole, the project description is complete. However, there are areas requiring more clarity and additional analysis.

- 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 residential uses directly west of the Project, within 600 feet (and as close as 400 feet). There is also no mention of the CRA/LA Pacific Corridor and Beacon Street Project Areas, which include the Downtown San Pedro commercial and business district immediately adjacent to the proposed project site. These sections should be revised to include adjacent residential uses and

the CRA/LA Project Areas in the Final EIR/EIS to provide a contextual analysis to better assess potential impacts to surrounding residents and businesses.

- It is unclear whether the two proposed parking structures located east on Harbor Boulevard, between Swinford Street and Santa Cruz Street, would be designated for terminal passengers and Waterfront employees only. The Final EIR/EIS should clarify this in the Project Description.
- Because the Project Description regarding the Ports O'Call redevelopment and expansion is vague, it is difficult to ascertain the potential impacts to the surrounding area, particularly the adjacent the CRA/LA Project Areas. A more complete description should be included in the Final EIR/EIS.
- The DEIR does not clearly state what the improvements or activities adjacent to the Ports O'Call or Town Plaza would be; nor does it state if the proposed project has allocated short term guest slips for waterborne visitors. Clear and descriptive language should be included in the Final EIR/EIS that clarify these activities and improvements.
- The CRA/LA should be listed in the Final EIR/EIS as one of the affected agencies, especially because some of the proposed mitigation measures are located within our Project Areas.

In recognition of the project objectives of "increasing public access to the waterfront and providing connections between the waterfront and San Pedro community", the CRA/LA offers the following comments to ensure that the project truly serves as a linkage to the community and does not have the unintended consequences of isolating the waterfront. Our recommended mitigation measures are meant to reduce potential barriers and enhance the interconnectivity between the San Pedro Community and the waterfront.

Impacts to Aesthetics:

- The DEIR includes in its Project Description the development of two parking structures of almost 4,000 spaces at the corner of Swinford and Santa Cruz Streets to accommodate the growing cruise ship industry. However, little detail is provided on the layout and design of these structures. Because the presence of these two structures would have unavoidable and unmitigated aesthetic impacts, obscuring pedestrian visual connections and view corridors from the CRA/LA Project Areas to the waterfront, the CRA/LA recommends that POLA design and construct the parking structures in accordance with Alternative II of the SWWN Harbor Boulevard Seamless Study completed in October 2008. Moreover, it is recommended that the CRA/LA and Los Angeles City Planning Department review and approve the plans for the proposed parking structures before POLA begins the permitting process to minimize the aesthetic impacts to our adjacent Project Areas.
- Like the two parking structures located east on Harbor Boulevard, the Bluff parking structure layout and design has not been fully developed. While the proposal of the Bluff parking structure with its garden roof-top pedestrian connections could be an important community asset, the aesthetic impacts are unclear without a fleshed out design. Therefore, it is recommended that the CRA/LA and Los Angeles City Planning

Department also review and approve the plans for the proposed Bluff parking structure before POLA begins the permitting process.

- The Project Description should be clarified to explicitly state that landscape and streetscape improvements would cover the entirety of Harbor Boulevard from Swinford Street through 22nd Street.
- Understandably, POLA has committed to upgrades to eastern side of Harbor Boulevard, which is located within its boundaries. However, one-sided improvements on Harbor Boulevard would create an aesthetic impact that would disconnect the waterfront from the San Pedro community, which is in conflict with the project objective of connecting the waterfront to the San Pedro Community. To further strengthen the connection between the waterfront to San Pedro the CRA/LA recommends the extension of landscape and streetscape improvements to the western side of Harbor Boulevard. These improvements should be coordinated and undertaken in such a manner to minimize potential construction impacts.

Impacts to Mobility:

Mobility includes all forms of transport - foot, bike, car, bus, or trolley. Facilitating circulation between Downtown San Pedro and the waterfront is a key to increasing access and providing interconnectivity. In review of the DEIR, the CRA/LA identified nine (9) intersections within our Project Areas that would be impacted by the proposed project.

Trolley

- To reduce the number of trips generated to the Port and mitigate traffic congestion and vehicular/pedestrian conflicts, POLA should devise a subsequent plan for the extension of the Red Car into the Downtown San Pedro area as a mitigation measure. The expansion of the Red Car also would further the project objectives of "increasing public access and providing connections from San Pedro to the waterfront".

Vehicular:

- The CRA/LA recommends that the Waterfront Project closely coordinate the implementation of the traffic mitigation measures with the Los Angeles Department of Transportation and the CRA/LA.

Bicycle

- The CRA/LA recommends the incorporation of mitigation measures that ensure that the state standards for bicycle facilities are retained and or improved if bicycle lanes on Harbor Boulevard are relocated.

Pedestrian:

The DEIR indicates, on page ES-18 in the Executive Summary that pedestrian connections would be devised in accordance to the Harbor Boulevard Seamless Study (SMWM 2008); those connections would be provided at Swinford, O'Farrell, 1st, 3rd, 5th, 6th, 7th, and 13th (pedestrian bridge), and 22nd Streets, with through vehicular access to the Project area via 1st, 3rd, 5th, and 7th Streets. The DEIR language suggests that development of landmarks included at these pedestrian crossings should be developed, but does not specify the implementing Agency.

Moreover, the reconfiguration of Harbor Boulevard and Gaffey Street to add another vehicular lane would create greater pedestrian and visual barriers that are not fully addressed by the DEIR nor its mitigations measures. Since one of the objectives of the Waterfront Project and the CRA/LA is to create greater accessibility to the waterfront, the CRA/LA offers the following recommendations:

- Include mitigation measures that reduce vehicular/pedestrian conflicts and improve pedestrian safety between the waterfront and the larger San Pedro Community:
 - Signalized (designated for pedestrian crossing) crosswalks for the safe pedestrian only passage over Harbor Boulevard and Gaffey Street.
 - Create wide crosswalks with unique paving to differentiate from the roadway on both Harbor Boulevard and Gaffey Street.
 - Provide sufficient pedestrian and roadway lighting to ensure the safety of the pedestrians on Harbor Boulevard and Gaffey Street.
 - Create pedestrian crossings and paths connecting 8th, 9th, 10th, 11th, and 12th Streets to Harbor Boulevard through Beacon Street, and include signalized (designated for pedestrian crossing) crosswalks at 8th, 9th, 10th, 11th, and 12th Streets crossing at Harbor Boulevard onto the garden roof-top Bluff parking structure.
- Include as a mitigation measure directional signage for pedestrian access from 8th, 9th, 10th, 11th, and 12th Streets to the proposed garden roof-top of the Bluff parking.

Cumulative Impacts:

The DEIR as explained above does not provide a full context of the surrounding area and perhaps because of this omission does not completely address potential cumulative impacts. A more thorough analysis of cumulative impacts should be included in the Final EIR/EIS. Because of the immediate proximity of the Waterfront Project to the Beacon Street and Pacific Corridor Project Areas, the Project could result in physical changes to the environment that impacts the revitalization efforts of the CRA/LA particularly during the construction phases.

- The Final EIR/EIS should more fully evaluate potential economic impacts on Downtown San Pedro during the construction phase of the Project and incorporate mitigation measures to remediate these impacts prior to the issuance of any Requests for Proposals.
- The Final EIR/EIS should more fully evaluate the potential economic impacts on Downtown San Pedro once the construction phases have been completed. While the Project will likely enhance revitalization efforts, it could create unintended barriers to business activity in Downtown San Pedro such as the loss of nearby free parking, addition of vehicular traffic, and obstruction of view corridors. Therefore, CRA/LA recommends that POLA incorporate mitigation measures to remediate these impacts prior to the issuance of any Requests for Proposals. As part of these mitigation

measures, POLA should devise and fund a marketing plan to promote Downtown San Pedro and its businesses at Ports O'Call in collaboration with CRA/LA.

- The Waterfront Project proposes removal of free parking on the project site, and as mitigation measures the removal of street parking on Harbor Boulevard and Gaffey Street. The first action would create a spill over of parking onto the neighborhood streets and Downtown San Pedro, negatively impacting the overall community; and the second action would create a hardship on residents and business owners, reducing parking on the whole. Therefore, the CRA/LA recommends as a mitigation measure the designation of off-site parking structure(s) that would serve both the Waterfront Project and the impacted Downtown and neighborhoods.

I am grateful for the opportunity to review the DEIR for the San Pedro Waterfront Project and look forward to our continued partnership in the redevelopment and revitalization of the San Pedro 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,



Barron McCoy
Regional Administrator - LA Harbor Region

cc: Pauline Lewicki, CRA/LA Principal Planner
Robert Manford, Phd., CRA/LA Senior Environmental Planner
Susan Totaro, CRA/LA Project Manager
Megan Hunter, CRA/LA City Planner
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