



CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

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February 25, 2009

Sam A. Joumbat, Executive Director
Intermodal Container Transfer Facility Joint Powers Authority
P.O. Box 570
Long Beach, CA 90801-0570

SUBJECT: Initial Study/Notice of Preparation for an Environmental Impact Report for the Intermodal Container Transfer Facility Expansion and Modernization Project

Dear Mr. Joumbat:

The City of Long Beach offers the following comments on the Initial Study and Notice of Preparation (NOP) for the proposed Intermodal Container Transfer Facility Expansion and Modernization Project:

Project Visual Appearance

The project description should include a property maintenance program, particularly regarding bridges, overpasses and adjacent embankments. The current project visual environment is unfortunately characterized by structures that display peeling paint and graffiti, giving the project site an overall neglected and deteriorated appearance. An ongoing maintenance program should take into consideration the visual impacts of the project site to surrounding neighborhoods and include regularly scheduled trash and graffiti removal, embankment maintenance, and perimeter landscaping.

Light and Glare

The project would maintain continuous operations 24 hours, seven days a week with nighttime external and internal illumination. The NOP states that although the project would replace existing lighting fixtures with lower height hooded fixtures directed downward, there would be an increase in the number of lights and the illuminated area. Given the presence of residential land uses immediately to the east of the project site, the project could potentially have significant impacts to sensitive receptors in the surrounding residential areas. The Environmental Impact Report (EIR) should therefore provide the following:

- An analysis of potential light and glare impacts to properties in Long Beach, with particular emphasis on impacts to sensitive receptors such as residential neighborhoods, nearby schools, churches, shelters, and medical land uses
- Identification of possible mitigation measures, including glare shields, reduced number of lighting fixtures on the eastern portion of the project site, and reduced nighttime hours of operation

Air Quality / Greenhouse Gases

As stated in the NOP, project construction would produce a short-term increase in emissions and project operations could permanently adversely impact air quality, primarily through the increase in activity by mobile sources associated with the project. The project as proposed could result in an increase in toxic air contaminant emissions in the immediate site area during both construction and project operations.

The EIR air quality impact analysis should include the following:

- Construction-related air quality impacts from both off-road mobile sources (e.g., heavy duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, container truck trips)
- Operational air quality impacts from both on-site activities (e.g., container handling equipment) and off-site vehicular trips (e.g., worker vehicular trips, container truck trips)
- Average and maximum daily on-site operational emissions by pollutant type using current and proposed technologies
- Comparison of anticipated operational emissions between diesel powered and alternative non-diesel powered delivery systems
- A Human Health Risk Assessment on pollutant emission impacts to adjacent residents and sensitive receptors in Long Beach for both diesel and non-diesel powered systems
- Inclusion of all applicable mitigation measures as required by the South Coast Air Quality Management District
- Analysis of the potentially cumulatively considerable net increase in greenhouse gas emissions

Hazards and Hazardous Materials

The NOP states that at present it is not known whether hazardous materials are contained in the existing project site improvements. An existing 20,000 gallon above-ground diesel storage tank and a 1,000 gallon above-ground unleaded gasoline tank will be removed as part of project implementation, both having the potential for soil contamination. There also may be hazardous materials on the project site from past industrial land uses. The project is within one-quarter mile of several schools and residential neighborhoods in Long Beach.

The EIR hazards and hazardous materials analysis should include the following:

- Determination of whether any current or historic uses at the project site have resulted in the release of any hazardous wastes or substances in the project vicinity, particularly in relation to nearby residential areas in Long Beach
- Identification of any known or potentially contaminated areas within the project site
- A Human Health Risk Assessment on soil and groundwater contamination, with particular emphasis on impacts to residents and sensitive receptors in Long Beach
- Mitigation measures that are in full compliance with all notification and remediation procedures set forth by the California Department of Toxic Substance Control (DTSC) and the Regional Water Quality Control Board

Land Use

The NOP states that the project site is regulated by the Cities of Los Angeles and Carson. Based on the information provided in the NOP, no portion of the project site is located within the City of Long Beach. If any approvals or discretionary entitlements from the City of Long Beach are required for any part of project implementation, the EIR should fully disclose this requirement and discuss the project's compatibility with current Long Beach land use regulations.

Noise

The NOP acknowledges that noise from project activities could exceed local or applicable noise standards and potentially adversely impact the adjacent residential areas in the City of Long Beach. As stated in the NOP, the greatest concern regarding noise impacts are the residential portions of Long Beach adjacent to the eastern boundary of the ICTF.

The EIR noise impact analysis should include the following:

- Analysis of potential noise impacts associated with both project construction and operations, particularly in terms of potential impacts to residents and sensitive receptors in Long Beach
- Analysis of noise impacts to nearby residents due to nighttime project activity, including 24 hour truck and rail operations
- Identification of mitigation measures, including technological improvements on noise muffling equipment, strict adherence to exterior noise level limitations as set forth in Chapter 8.80 (Noise) of the Long Beach Municipal Code, and limiting nighttime hours of operation

Population and Housing

While the proposed project would not induce substantial population growth, there could be substantial displacement of people and housing units due to the negative environmental effects associated with air, noise, traffic and other adverse physical impacts generated by the proposed project. Therefore, the EIR should provide a population and housing impact analysis that includes the following:

- A thorough analysis on the project's economic and social effects on the surrounding physical environment in accordance with CEQA Guidelines Section 15131
- Discussion of the project's potential for physical deterioration to nearby residential neighborhoods and commercial areas through declining property values, causing a ripple effect of store closures, long term vacancies and urban decay in Long Beach neighborhoods
- Mitigation measures to lessen urban decay impacts to Long Beach, including limited operational capacity, alternative project locations, or a residential improvement program to fund upgrades such as window noise insulation

Public Services

The project could impact emergency service delivery and response times to nearby communities. Therefore, the EIR should provide a public services analysis that includes the following:

- Analysis of project impacts to police and fire service staff resources
- Analysis of project impacts on emergency service response routes and response times to nearby neighborhoods
- Analysis of project impacts to nearby schools, particularly in terms of local intersection levels of service

Transportation/Traffic

The project is anticipated to increase truck traffic on existing major traffic arteries, with operations producing an estimated increase in truck traffic of about 1.1 million one-way truck trips per year. This potential impact on volume-to-capacity ratios and level-of-service standards at local intersections could adversely affect nearby residential neighborhoods in Long Beach.

The EIR transportation/traffic impact analysis should examine the following factors:

- Identify all intersections and corridors potentially impacted by project truck travel patterns, particularly along the Willow Street, Santa Fe Avenue and Pacific Coast Highway corridors in Long Beach
- Provide Intersection Capacity Utilization (ICU) calculations for all nearby intersections within the City of Long Beach and Highway Capacity calculations for all State roadways in the project vicinity (e.g., Pacific Coast Highway)
- Account for the high percentage of project truck trips through the use of passenger car equivalents in order to provide a meaningful level of service analysis at both traffic signals and roadway segments
- Analyze project site entrance operations (capacity vs. anticipated demand) to determine the required on-site queuing capacity necessary to prevent impacts to the public street network

- Analyze on-site truck turning movements to determine if sufficient space is allocated for complex movements, including on-site U-turns
- Analyze potential impacts to emergency services response routes and response times to the project area and nearby areas
- Analyze alternative access routes to the project, including a direct connection with the Terminal Island Freeway

Parking

The NOP states that the project would not have any adverse parking impacts since it is not expected to result in an increase in workers during project construction or operations. However, other factors can influence parking impacts, including a reduction in the number or accessibility of parking spaces. The NOP does acknowledge that the project would increase traffic during the construction phase by an estimated 100 to 150 construction workers, plus additional trips to deliver construction materials. The EIR should include a Parking Impact Study to determine if any adverse parking impacts could occur at any phase of the project construction or operations. This Study should address parking impacts resulting from any potential loss of existing on-site parking spaces for trucks and trailers and any possible increase in worker and/or truck parking demands from project operations. This Study should also consider the need for a construction worker parking management plan.

Alternatives

CEQA requires EIRs to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic project objectives while avoiding or substantially lessening significant environmental impacts, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines Section 15126.6(f)(2)(A) states that in regard to alternative project locations, "(t)he key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." In addition, a reduced size project alternative should be included to determine if a smaller project could attain most of the project objectives while reducing environmental effects.

At a minimum, the EIR should include the following alternatives with sufficient information to allow meaningful evaluation, analysis, and comparison with the proposed project:

On-Dock Alternative Location

This Alternative would provide the greatest reduction in the most significant environmental impacts to nearby residential neighborhoods and other sensitive receptors in regard to air, noise, traffic, and nighttime lighting impacts as well as potentially reducing freeway traffic impacts.

Near-Dock Alternative Location

This Alternative would locate project activities close to the Ports but further from residential neighborhoods. Aerial maps of the surrounding area clearly show an

abundance of rail lines on nearby sites between Terminal Island and the proposed project site (as well as potential project areas along or near Alameda Street in the Carson area between Lomita Boulevard and the 405 freeway). An alternative near-dock facility in this area would lessen environmental impacts to residential areas and on the 710 freeway, although localized impacts in terms of air, noise, traffic and nighttime lighting could be significant.

Reduced Project Alternative

This Alternative would be a reduced scale version of the project at the same proposed location. As such, localized project impacts related to air, noise, and traffic would be proportionally reduced although nighttime lighting impacts could be similar to the project as proposed.

Mitigation Measures

Recommended mitigation measures include the following:

- Sustainability and Green Port improvements on at least the same level of commitment as the Port of Long Beach Green Port Policy and the San Pedro Bay Ports Clean Air Action Plan
- Design features to eliminate the use of diesel-powered railroad switch engines, diesel-powered yard hostling trucks, diesel-powered cranes, and other diesel and high polluting fuels from all truck and rail equipment operations
- Incorporate automatic idling reduction devices to all locomotives

All questions regarding this comment letter should be directed to me at (562) 570-6428 or Jill Griffiths, Advance Planning Officer, at (562) 570-6191.

Sincerely,



Craig Beck
Director of Development Services

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