

Office of the
City Attorney

CITY OF
RIVERSIDE

February 24, 2009

Via Overnight Delivery

Sam Joumblat
Executive Director of the ICTF JPA
925 Harbor Plaza
Long Beach, CA 90802

Re: ***ICTF Modernization and Expansion Project NOP***
Our File No. 08-0567.2

Dear Mr. Joumblat;

On behalf of the City of Riverside, I thank you for the opportunity to review and comment on the Notice of Preparation for the ICTF Modernization and Expansion Project. The City of Riverside is uniquely situated from having 26 at-grade rail crossings, and suffering the impacts from those crossings.

The Project NOP estimates that it will double the number of trains serving the ports of Los Angeles and Long Beach. With only that information, Riverside can expect that the port-derived fraction of rail traffic travelling through the City - currently, approximately 75% of all rail traffic - will double. Riverside's rail traffic will thus increase from 128 trips per day to 224 per day. Not only will the trains bring many tons of air pollution and noise, while dividing an established community, but the trains will further paralyze traffic flow throughout the City. Stopped vehicles waiting for trains are an impact, as are the tons of pollutants caused by the needless burning of tons of fuel while waiting for the trains to pass.

A much more serious impact is the delay of emergency response vehicles due to train blockages. Police, fire, and medical responses are delayed an average of 3 minutes per train stoppage, with some delays over 20 minutes. Finally, increasing the number of trains will increase the number of rail/vehicle and rail/pedestrian collisions.

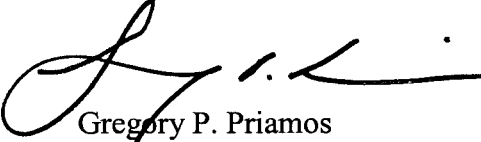


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Riverside respectfully submits that the EIR for this Project must address the direct, indirect, and cumulative impacts to Riverside of doubling the number of trains to and from the ports. Fortunately, mitigation is a simple matter of separating the rail and vehicle grades. Riverside has an active grade separation program which can assist with any grade separation mitigation measures, and we look forward to working with the JPA on this matter.

Thank you in advance for your efforts. If you have any questions, or if the City can be of any assistance in this matter, please do not hesitate to contact us directly.

Respectfully submitted,



Gregory P. Priamos
City Attorney

GPP/ALB

c: Dr. Geraldine Knatz, Executive Director, Port of Los Angeles
Richard D. Steinke, Executive Director, Port of Long Beach
Steve Adams, Councilmember
Andy Melendrez, Councilmember
Bradley J. Hudson, City Manager
Belinda J. Graham, Assistant City Manager
Tom Boyd, Deputy Public Works Director
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