

12 February 2009

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

SUBJECT: Comments in Response to the Notice of Preparation of an Environmental Impact Report for the Proposed Intermodal Container Transfer Facility Expansion and Modernization Project

Dear Mr. Joumbat:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the scope of the proposed Environmental Impact Report (EIR) for the above-mentioned project. We have reviewed the Notice of Preparation and Initial Study (NOP/IS), and offer the following comments:

1. The NOP/IS discusses potential impacts related to air quality, noise and transportation, focusing mainly upon impacts to the neighborhoods immediately surrounding the current ICTF site. We understand that among the goals of this project are “[providing] additional near-dock rail capacity and container throughput by increasing operation efficiencies consistent with the Ports’ Rail Master Plan Study and minimizing surface transportation congestion and/or delays” and “[continuing] to promote the direct transfer of cargo from port to rail with minimal surface transportation congestion and/or delays.” The City of Rancho Palos Verdes is supportive of these goals since many residents on the east side of our City have experienced increased air quality, noise and traffic impacts as a result of expansion projects in the Port of Los Angeles over the past few years. We respectfully suggest that the analysis of the air quality, noise and transportation impacts of the ICTF project should be expanded to assess the regional environmental effects—presumably positive—that this project would have upon residents on the Palos Verdes Peninsula and in the communities of San Pedro, Harbor City and Wilmington in the City of Los Angeles.
2. The NOP/IS notes that the analysis of project alternatives (as mandated by CEQA) is expected to include “a reduced capacity alternative, alternative locations for the facility, including the use of on-dock and inland Port facilities,

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alternative transportation system technology, and alternative technology delivery systems from the [Ports] to the [ICTF].” With respect to the identification of alternative locations for the facility, the City of Rancho Palos Verdes respectfully suggests that any alternative that places all or a portion of the ICTF in closer proximity to the Port of Los Angeles and its surrounding communities—including the City of Rancho Palos Verdes—should be excluded from consideration as infeasible on the basis of being inconsistent with the primary goals of this project.

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