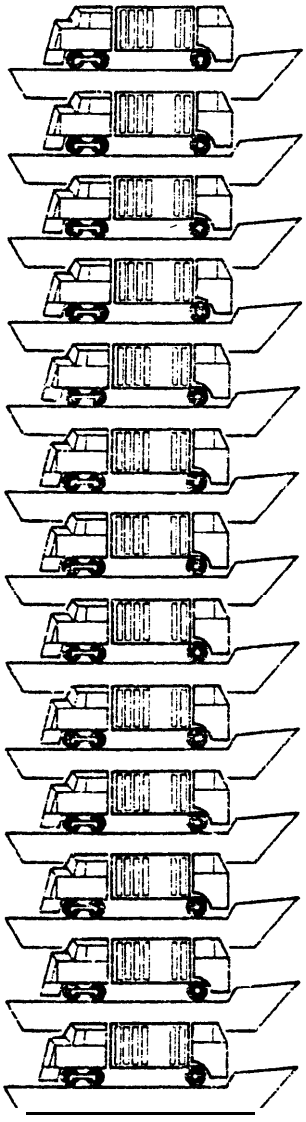
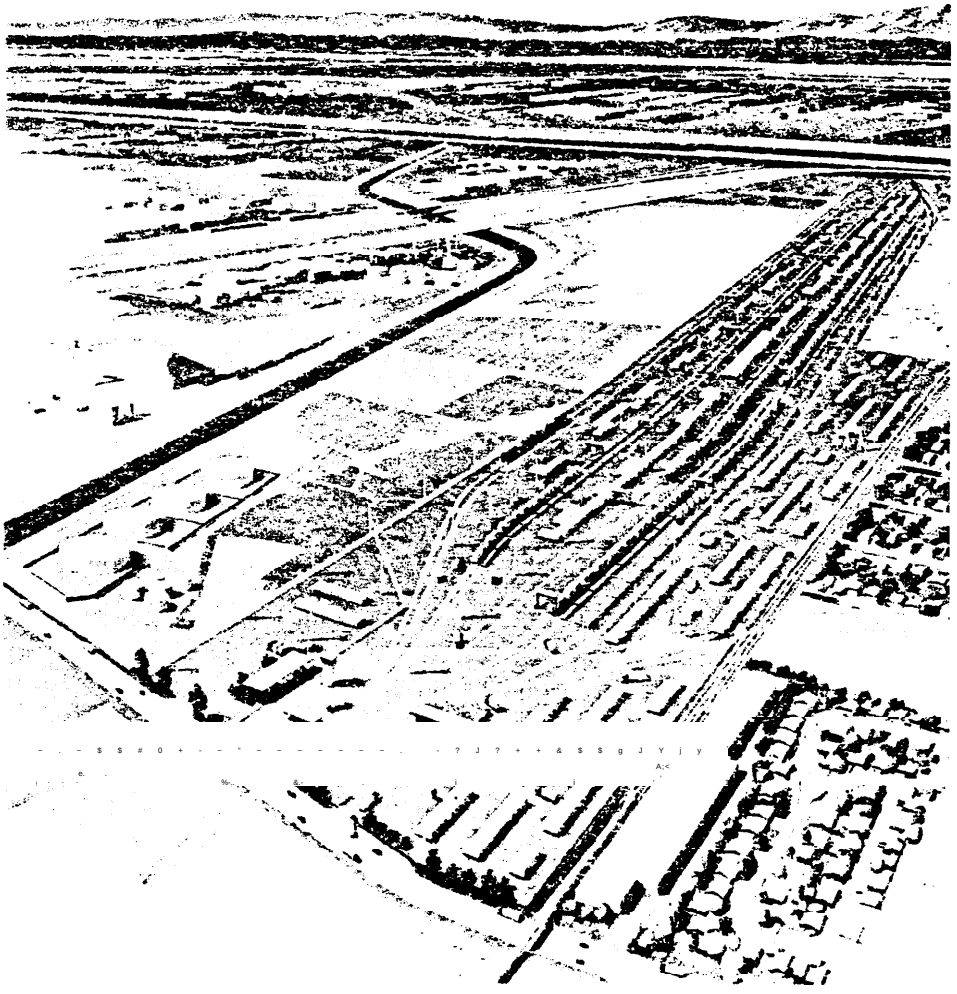
ICTF

INTERMODAL CONTAINER
TRANSFER FACILITY





Environmental Impact Rep

Final Oct., 1982

PREPARED BY: THE WRBGR ENVIRONMENTAL STAFF, LOS ANGELES HARBGR DEPAKiWiENT
THE PORT PLANNING STAFF, LONG BEACH HARBOR UETARTMENT

FINAL

ENVIRONMENTAL IMPACT REPORT

FOR THE

INTERMODAL CONTAINER TRANSFER FACILITY

State Clearinghouse No. 81100215

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October, 1982

This document combined with the Draft EIR for the Intermodal Container Transfer Facility (dated June, 1982) constitutes the Final EIR.

October 8, 1982

TO ALL CONCERNED PARTIES:

SUBJECT: FINAL ENVIRONMENTAL IMPACT REPORT - INTERMODAL CONTAINER TRANSFER FACILITY

This is to certify that the subject Environmental Impact Report has been prepared in compliance with the California Environmental Quality Act (CEQA) of 1970, with the State EIR Guidelines, and with the City of Los Angeles CEQA Guidelines promulgated thereunder.

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CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

SUMMARY SHEET

(Article IV - City CEQA Guidelines)

$ POSS1Bl.E IMPACTS (Check where a Yes is appropriate)

k-Significant Adverse Impact;witigation Measures Available; C-Unavoidable Adverse Impact	A	B	C
1. EARTH			
a. Change in topography or ground surface relief features?			
b. Increase in wind or water erosion?			
c. Unstable or hazardous geologic or oil conditions?			
2. AIR			
. Increased mobile or stationary air emissions or air quality?			X
b. Creation of objectionable odors?			
3. WATER			
. Change in absorption rates,.drainage patterns, or surface runoff?			X
b. Alteration to direction of any water course3			
. Reduction in amount of water available for public water supplies?			
d.Exposuretoflood hazards?.			
4. PLANT UFE			
. Reduction of the numbers of any unique or endangered species of plants?			
b. Reduction of existing mature trees?			
c. Change in diversity of species?			
5. ANIMAL LIFE			
. Reduction of the numbers of any unique or endangered species of animals?			
b. Introduction or increase of any new animals?			
. Impact on any existing animal habitat?			A - -
6. NOISE			
a Increase in existing noise levels?	X	X	X
b: Exposure of people to noise levels?		7 h	X
7. UGHT Will proposal produce light or glare?		X	X
8. LAND USE Alteration of the present or planned land use of the area?			X
9. NATURAL RESOURCES			
a *Increase* in consumption of any natural resource?		X	X
b. Depletion of any non-renewable natural resource?		X	X
10. POPULATION Any increase or alteration of the distribution, density of growth rate of the population?			
1. HOUSING Any increase in the demand for housing or reduction in existing housing?			
12. TRANSPORTATION/CIRCULATION			
a. Increase in traffic volume or change in circulation patterns?			X
b. Increase in parking demand (not met by onsite parking provided by the project)?			
c. Increased hazards to vehicles, bicyclists or pedestrians?			x
d. Impact on existing transportatfon systems?.		X	v
13. PUBLIC SERVICES			
. hrease in demand for fire, police or other governmental services? :			X
b. Impact on school or recreational services?.			
o. Increase in maintenance of public facilities including roads?			x
14. ENERGY			
a. Use of' additional amounts of fuel or energy?		X	X
b. increase in demand upon existing sources of *&rgy 'or &uired development of new sources of energy?		X	X
15. UTILITIES			
. Demand on water, gas, power or communication systems?			X
b. Impact on sewer or solid waste disposal?.			X
C. Impact on storm water drainage? .F			Y
16. SAFETY			
a. Creation of any health hazard?			
b. Potential risk of explosion or release of'dh&$& 'dt'&kon in event of accident?		X	X
17. AESTHETICS Will this project result in a diminishment or obstruction of a publicly available scenic vista, or in the creation of an offensive site visible to the public?			
8. CULTURAL RESOURCES Will this project impact or alter any archaeological, paleontological or historical site, structure, or object?			
3THER			
***i&out mitigation masuzm**			

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EXECUTIVE SUMMARY

PROJECT LOCATION

The proposed site of the Intermodal Container Transfer Facility (ICTF) in its ultimate development encompasses approximately 260 acres of land north of Sepulveda Boulevard. The site is bounded on the south by Sepulveda Boulevard/Willow Street, on the north by 223rd Street, on the east by the Los Angeles/Long Beach city limits, and on the west by Los Angeles/Carson city limits.

PROJECT OBJECTIVE AND DESCRIPTION

The Ports of Los Angeles and Long Beach jointly propose to construct the Intermodal Container Transfer Facility, in conjunction with the Southern Pacific Transportation Company. The ICTF will provide a closer, more centralized location for the transfer of marine-oriented containers from the container terminals to the rail transfer yards. Presently, these containers are trucked 22 to 28 miles from the Ports' area to downtown Los Angeles railyards. With the construction of the ICTF, marine containers which are transported by Southern Pacific rail line would be trucked only 4 to 6 miles.

The ICTF will be developed in three phases. However, the implementation of second and third phases is dependent on the container throughput demand and the economic feasibility to construct the subsequent phases. The major elements of each phase are summarized below.

Phase I (1983 - 1990):

- Facility improvements, including paving, utility installation, lighting, buildings and other site improvements.
- Grade separation of Alameda Street to provide rail access to the site.
- Improvements to Sepulveda Boulevard including truck access to the site.
- Eight railroad tracks (six working tracks and two return tracks).

Phase II (1991 - 1995):

- Two additional working tracks.
- Remote storage construction.

Phase III (1996 - 2000):

- Four additional working tracks.
- Additional remote storage construction.

In addition to the 137 acres of Port of Los Angeles property, project development will require the acquisition or lease of approximately 123 acres of additional adjacent land, including property within the City of Carson.

ENVIRONMENTAL IMPACTS AND MITIGATIONS

BENEFICIAL IMPACTS:

- Increased efficiency of container movement;
- Reduced truck-miles-traveled and truck travel time;
- Reduced fossil fuel consumption;
- Reduced air emissions in the Basin;
- Consolidation of truck travel;
- Improved safety through decreased truck-miles-traveled;
- Reduced road wear to the highways; and
- Reduced container transportation cost;
- Positive impacts to local economy.

ADVERSE IMPACTS AND MITIGATIONS:

For summary of Potential Impacts and Consideration of Mitigation Measures see the table on the following page.

ALTERNATIVES

Feasibility and technical studies examined the following alternatives:

- No project alternative:
- Alternative site locations;
- Direct rail access to the container terminals;
- Reduced development alternative;
- Facility access (rail and truck) alternatives; and
- Preferred alternative.

The proposed project was selected as the preferred alternative, because it. provided the most efficient and effective solution to an existing need, while minimizing the adverse impacts. No other site locations in close proximity to San Pedro Bay which meet the objectives of the ICTF are available. The beneficial impacts of increased container transport efficiency and reduced truck-miles-traveled (with the subsequent reductions in fuel consumption and air emissions) would be lost if the ICTF project were not implemented.

TABLE: SUMMARY Of POTENTIAL ADVERSE IMPACTS AND CONSIDERATION OF MITIGATION MEASURES

POTENTIAL ADVERSE IMPACTS	CONSIDERATIONS PROPOSED AS PART OF THE PROJECT THAT MITIGATE OR AVOW ADVERSE ENVIRONMENTAL IMPACTS	ECONOMIC, SOCIAL OR OTHER CONSIDERATIONS WHICH HAKE INFEASIBLE MITIGATIONS OR ALTERNATIVES	MITIGATIONS WHICH ARE WITHIN THE RESPONSIBILITY AND JURISDICTION OF ANOTHER PUBLIC AGENCY
A. Air Quality Impacts: construction and operation will result III insignificant Increases of primary air pollutant emissions.	Construction: Water spray will be used to control fugitive dust emissions. Constructlo; activity will be of temporary duration and phased throughout the ICTF development. Reduction of Intensive CON-struction activity on days of greatest air pollution potential as designated by the present SCAQMO program will be Implemented. long term air quality benefits will result from the net reduction In air pollutants generated from the decreased truck transport of containers. long term air quality benefits will result from increased container handling efficiency and use of container handling equipment which Incorporates state-of-the art air pollutant control technology.		Implementation of a mandatory state-wide or basin-wide Inspection and maintenance program for motor vehicles.
B. Water Quality Impacts: paving of the site will insignificantly increase storm titer runoff and decrease ground water recharge.	Storm drains will Incorporate oil and grease traps, where required. The waste discharge requirements of the California Regional Mater Quality Control Board (CRHQCB) will he met, If a CRtiyC8 penult is required. Stored containers carrying hazardous materials will be held in **a** segregated area such that water runoff from this area will **be** contained and isolated from the rest of the drainage system for the ICTF site.		

POTENTIAL ADVERSE IMPACTS	CONSIDERATIONS PROPOSED AS PART OF THE PROJECT THAT MITIGATE OR AVOID ADVERSE ENVIRONMENTAL IMPACTS	ECONOMIC, SOCIAL OR OTHER CONSIDERATIONS WHICH MAKE INFEASIBLE MITIGATIONS OR ALTERNATIVES	MITIGATIONS WHICH ARE WITHIN THE RESPONSIBILITY AND JURISDICTION OF ANOTHER PUBLIC AGENCY
C. Habitats and Biota Impacts: project construction and operation will eliminate a minimal amount of terrestrial habitats for fauna and flora (including agricultural crops) and may insignificantly impact adjacent marine communities.	The loss of terrestrial habitat is so minor that no mitigations are proposed. Landscape material to be planted will provide limited habitats for fauna. Marine communities in the adjacent Dominguez Channel will be protected by mitigations provided to control potential water quality impacts.		
D. Noise Impacts: project construction and operation will generate increased noise levels. With the mitigations proposed, the impacts to areas adjacent to the ICTF site will not be significant. Impacts of increased noise to certain residential areas along the rail corridors may be potentially significant.	Construction: Unless the noise barrier walls pose access problems, the walls will be installed in the initial phases of construction. In view of the probable use of noise barriers to be installed and the distances involved, noise produced by ICTF construction activity should not be substantially annoying to residential areas adjacent to the ICTF. Provisions of applicable noise ordinances regarding construction noise disturbances will be met. Operation of the ICTF Equipment: Noise barrier walls will be installed along the northeasterly portion of the ICTF site adjacent to the residential area east of Hesperian Avenue. Equipment noise specifications which may include the use of residential class silencers on the diesel engines and enclosure of the power plant on the bridge cranes and mufflers on the yard hostlers will be developed and implemented to achieve the standards of applicable noise ordinances, if required. Remote storage and stacking of containers will assist in noise attenuation. Noise measurements will be taken during the first three months of the ICTF operation to verify the effectiveness of the engineering design/mitigation measures and its implementation. If necessary,		

JOTENT IN. ADVERSE IMPACTS	CONSIDERATIONS PROPOSFD AS PART OF THE PROJECT TUAT HIIIGATE OR AVOIO ADVERSE ENVIRONHENTA!. JHPACTS	ECDNOtiK, SOCIAL DR OTUER CONSIDERATIDNS WIIICII HAKE INfEASIfIIE IIITIGATIONS OR AITERHATIVFS	HITIGATIONS WHICH ARE WITHIN TIIE RESPONSI8ILITY AND JURISDICTION OF A!@TIIER PUBLIC AGEHCV_
	rddltional feasible mitigation measures will be undertaken. Operation of ICTf Trains: Continuously welded-s will be installed for rail access-to the KTf site frun the Dolores Yard and for the tracks within the ICTF. Reduced train s eeds of less than 15 uph uifl be mtntalned ;chiie the trains are wlthin the To the extent feasible, the westerly return (turnaround) tracks will be used by the locomotives during nlghttlme hours to ralnimlze hnpacts to lhe resldentlal areas easterly of the ICTF. The ICTF 411 not be a rail classification yard, and normal operations will Involve only ainimal snitching activity. 140 nltlgatlons are proposed as part of the project to reduce potential noise frola ICTF trains along the Wlltnlrgton asd San Pedro Branches of the SPT Co. rail Ilne, although sections of tracks along these corridors will be itsproved and replaced cri th continuously welded track as part of the SPT Co. maintenance and reucwa1 program.		ICTF-related rail movements are under the jurisdiction of state and federal agencies and, therefore, noise produced by these lnovements Is not required to coluply with local land use llcies and regulations. rrains travelllng on Southern Paclflc's San Pedro and Yilullngton Branches and outside the Los Angeles Harbor Departneut boundaries and its jurisdictions. Noise froca railroad locoruotive aud rail car o eratlons Is regulated by the Rairroad Noise Emission Standards established by the fnvironaental Protectton Agency. fnforceuient of these standards is utrder the Jurisdiction of the federal Railroad AJluinistration. Holse fruu railroad bells, horns, and h)~istles is reyulated by the Californla Public Utilities Comlsslon.
E. Vibratiorl Imacts: ICTF rail operations ;Jill increase vibratiolb lo residential areas adjoining the ICTF and to r-csidential areas along the r-al I corridors. None of the future impact is considered slg~blticfint.	For vibratiou iiiitlgatlous, see ml tiga tion measures give,~ uodcr Ho i se: Operation of ICTF Trdius.		
F. light crnd Glare Impacts: iwwased levels of light drlti glare will result from the opcratiur, of the I(11E. Thca;e	The lCTF lighting system will la d&sJigned such that the potcutially annoying impdcts of Tight and glare will he Hlltigdtcd. Engineering		

POTFUT IA1 ADVERSE THPACTS	CONSIDERATIONS PROPOSED AS PART OF TUE PROJECT TUAT MITTGAIE OR AVOID ADVERSE ENVIRONMENTAL IMPACTS	ECOHOi4IC, SOCIAL OR OTUER CONSIDERATIONS UUICU MAKE INFEASIBLE NITIGATIONS OR ALTERNATIVES	HITtGATiONS WUICU ARE WITUIN TUF RESPONSIDTIITY MD JURISDTWTTDN OF ANOTUEP PURIIC AGENCY
increases wilrnot significantly impact adjacent areas.	deston features that will be incorporated include reduction in the number of lamps at the perimeter, tnward and downward focusing of lamps, and use of an automatically timed lighting systal to avoid unnecessary transmission of ltght.		
6. Safety hipacts: safety impacts lo adjacent areas may result from increased fire potenttal and* from the transport and handling of containers carrying hazardous materials. Crealer train and truck activity will increase the potential for train/vehtcle accidents. These potential impacts to safety and the risk of upset are not considered as stgntftcant.	On-site safely features wtli be incorporated into the final deslyn of the project to mitigate potential hazards: Fire protection measures includiny ingress/egress routes, fire lanes, fire flow capabilities, hydrants, sprinklers, and general fire equlp-ment whtch is in conformance with the Los Angeles Munictpal Code and the Los Angeles Fire Department Planning Dlvtsion. Segregation of stored contalners wI th hazardous materials la a spectfic area desIgned with special spill contaTmient and fire fighting capabtltties. Storage of flaauaahle fuels in a 10s Angeles fire Department-approved underground tank. General security measures to include perimeter fencing, lighting . and 24 hour surveillance. Approved emergency response plan. as required by the Slate of California Ucalth and 'Safety Code, Title 8. Off-site safety features will be incorpordled into the project to enhance rail and truck safety;		The transport and handling of hazardous materials in containers is regulated by the U.S. Department of Transnortation. The SPT Co. has developed a document Instructions for Handlinq Hazardous Materials which sets forth procedures as required by the Uizardous Materials Reyulattons of the U.S. Department of Transportation. SPT Co. em loyees are oryantzed and trained in tPe handling of hazardous materials. The State Public Utilties Corulssion (PUC) Is the public agency that has jurtsdiction for ensuring the public safety at at-grade rail crossings. The SPT Co. has agreed to work closely wi lh the PUC Ili resolving potential safety hazards at affected grade crossings. Additionally, the SPT Co. is currently cooperating with local ayencirs from the cities of 10s Angeles and Carson and the County of 10s Angeles to develop ml tigation measures for certain grade crossings which wilt be affected by the additional ICTF trains.

POTENTIAL ADVERSE IMPACTS	CONSIDERATIONS PROPOSED AS PART OF THE PROJECT THAT MITIGATE OR AVOID ADVERSE ENVIRONMENTAL IMPACTS	ECONOMIC, SOCIAL OR OTHER CONSIDERATIONS WHICH MAKE INFEASIBLE MITIGATIONS OR ALTERNATIVES	MITIGATIONS WHICH ARE WITHIN THE RESPONSIBILITY AND JURISDICTION OF ANOTHER PUBLIC AGENCY
	Specialized education and coordination of railroad employees into hazardous material teams. Trucks transporting containers with hazardous materials will conform to the special transportation provisions of the U.S. Department of Transportation.		
H. Socioeconomic Impacts: potential adverse impacts on land values of surrounding residential areas and impacts to property owners/tenants on land to be acquired for the ICTF development may occur. These impacts are not considered significant.	In cases where land required for the ICTF development is to be purchased, the fair market values of the land will be established through the use of independent land appraisers, and negotiated agreements will be reached. Potential impacts to affected residential land values will be reduced by mitigations developed to reduce increased noise levels from ICTF trains.		Agreements between tenants and owners of the property to be acquired for the ICTF development are beyond the jurisdictional control of the Ports. Because the majority of these tenant agreements include a 30-day revocable notice by either party, no mitigation measures are considered necessary. Although Macmillan Ring-Free Oil Company has a long term lease with Watson Land Company, Macmillan Oil Co. has not proceeded with construction of its proposed refinery expansion onto the required land parcel. Resolution between Macmillan Oil Co. and Watson Land Co. regarding this land parcel will be required.
I. Land Use Impacts: project implementation will result in changes to existing land uses with an intensification of industrial land use. Potentially adverse impacts of land use compatibility between the ICTF and adjacent residential areas were identified, but are not considered significant.	Potential impacts of land use compatibility will not result in significant effects to the residential areas adjacent to the ICTF due to mitigation measures that will be incorporated into the project. These mitigations include installation of noise barrier walls, landscaping, heavy ballast/sub-ballast for rail support, security fencing, etc.		Future developments in the area surrounding the ICTF will continue to be governed by local city zoning ordinances and specific land use plans.
J. Transportation and Circulation Impacts: construction and operation impacts to the traffic circulation and flow on the local street system and vehicular traffic delay at at-grade rail crossings along the affected rail corridor will result from increased ICTF-generated truck and rail activity. Impacts to traffic flow and circulation are not significant; however potentially significant	Construction: Construction impacts to the existing traffic flow and circulation pattern will be temporary. It is anticipated that the ICTF development will occur in three phases over a 13-17 year time span. Specific construction activities will be implemented in stages to minimize traffic disruption and delay. Specific engineering features such as provision of		

POTENTIAL ADVERSE IHPACTS	CONSIDERAllONS PROPOSED AS PART of TIL PROJECT TIIAT HITIGATE OR AVOID ADVERSE ENVIRONHENTAI. Il1PACTS	ECDNoMIC, SOCIAL OR DTUEA CDNSIOERATIONS UUICll HAKE INfEASIllLF HITIGATIONS OR ALTERNATIVES	HITIGAllONS UlIICll ARE WITUIN THE RESPONSI8ILITY AND JURISDICTIOR OF ANOTIIER PUlllC AGENCY
im acts on vehrcular traffic $,ja; at fail crossings may	teelporary detour lanesmbe developed in the flnal speclfl-catlons so that through traffic flow and access are maintained.		
	Operation: The impact on the existing street system of additlonal trucks-to/from the KTF will not be significant, and the calculated levels of service at major Intersections In the viclnlty of the ICTF were the same with or wlthout the ICTF project. To facilitate vehicular traffic flow and reduce vehicular delay, the following mitigations are Included: Improvements (striping, channel-izatlon and signallzatlon) to Sepulveda lloulevard along the 1CfF frontage and easterly to the Tenllnal Island Freeways. Segregated truck entrance/exit on Sepulveda Blvd. Improvements (turning lanes and signal phaslng) to the intersection of the Tenlllnal Island freeway at WIIIOH Street/Sepulvedd Blvd. Street signage program to improve truck traffic flow to and from the El te. Rail access grade seprrdtlon of Alameda Street. ICIF tralnr will La unit trains that nonrd1ly travel to/fraw lhc sl te at, through uovuIIu?iits wI tli 110 swlt~lilng operations. The ICTf will reduce truck-miles-traveled between the Ports ared dnd the downtown railyards; thereby, reducing lhe ntrebor of trucks on these street and highway systems.		Potential traffic impacts on Uillow Street between the Terminal Island Freeway and the lung Beach Freeway can be reduced by designating this segment of Willow Street as a non-truck route. This can be accom Iished by an amendutent lo the' Pong Beach Municipal Code by the City of Long Beach. Implementatlon of Assembly Bill 3375 which was signed by the Governor would provide street and intersectlon improvements in the Ports' area so that future traffic demand of Port develolmllents can be accorrllodated. Tire California Public Utilities Cornilssion (PM) is the state agency responsible tor raiI/hiylrway safety, and has jurisdiction for implementing public grade crossing improvements. SPT Co. has agreed tu tnrk closely with the PUC to evaluate the affected yrade crossings.

POTENTIAL ADVERSE IMPACTS	CONSIDERATIONS PROPOSED AS PART OF THE PROJECT THAT MITIGATE OR AVOID ADVERSE ENVIRONMENTAL IMPACTS	ECONOMIC, SOCIAL OR OTHER CONSIDERATIONS WHICH MAKE INFEASIBLE MITIGATIONS OR ALTERNATIVES	MITIGATIONS WHICH ARE WITHIN THE RESPONSIBILITY AND JURISDICTION OF ANOTHER PUBLIC AGENCY
	Use of double stack railcars to reduce the number of trains required to transport containers.		
K. Energy Impacts: the construction and operation of the ICTF will require expenditure of insignificant amounts of energy resources.	Construction: Implementation of an efficient project time schedule, design and equipment will avoid energy waste.		
	Operation: Major reduction in fossil fuel consumption for transporting and handling of containers will occur.		
	Use of energy efficient lighting will be implemented.		
	Energy conservation measures will be incorporated into the building design, including weatherstripping, insulation, and thermostat control devices.		
	Water conservation measures will be incorporated into the design of the ICTF.		
L. Public Service Impacts: the project will insignificantly increase the demand for public services, including police, fire, road maintenance and U.S. Customs services.	The ICTF will have security fencing, lighting and guarded access to minimize the need for assistance from the Los Angeles Harbor Department Port Wardens.		Mutual aid agreements between the City of Los Angeles and the County of Los Angeles and/or City of Long Beach would allow adequate fire protection service to the ICTF without expanding existing fire department facilities.
	All buildings will be constructed and fire protection devices and access roads installed as specified by the Los Angeles Municipal Code. An emergency response plan will be developed in cooperation with the Los Angeles Fire Department.		
M. Utility Impacts: the project construction and operation will result in minor increased demands on the utility systems (water, electrical power, natural gas, sanitary sewer, telephone, and storm drain).	No mitigations are required.		

ERRATA

The following changes/revisions apply to the Draft EIR for the Inter-modal Container Transfer Facility (dated June 1982).

Page N&/Paragraph/Line	Correction
v i - v i i i	Substitute the Executive Summary with the revised Executive Summary provided in the Final EIR.
l-l/2/3	Following “--owned by Watson Land Company" add "in the City of Carson".
1-6	Delete “Sea train”.
1-10	Correct "Southern California Edison Substration” to "Southern California Edison Substation”.
1-11/1/1	Delete “sets of”.
1-13	Delete “sets of”.
1-15/3/2	Correct "Phasse" to "Phase".
1-24	Change south leg of intersection from "Terminal. Island Freeway" to "Port of Los Angel es property".
1-32/1/2	Delete “sets of”.
1-34	Substitute: Table 2 with revised Table 2 provided on the following page.
2-5/1/3 & 2-6/2/2	Change "Matlock" to "Matlack”.
2-6	After paragraph 8 (Parcel 17), add the following: Parcel 18 $er Watson Land Company Vacant property Parcel 19 Owner Paul Marshall Products Use Light manufacturing, warehousing
2-7	Substitute Figure 27 with revised Figure 27 provided on the following pages.

TABLE 2

PROJECTED DEMAND FORECAST FOR ICTF
(International Containers)

Year	Total TEUs Through Both Ports 1	Total Bridge TEUs Through Both Ports (35%)	Projected ICTF Share (50% of Bridge TEUs) TEUs	Containers (TEU X .575)	Containers From East/Gulf Coast To ICTF 3	Total Container Throughput Demand For ICTF
1980	1,102,600	385,910	192,954	110,950	16,640	127,590
1981	1,233,886	428,360	214,180	123,200	18,475	141,675
1982	1,358,513	475,479	237,738	136,700	20,500	157,200
1983	1,507,949	527,782	263,890	151,700	22,760	174,460
1984	1,673,824	585,838	292,918	168,400	25,270	193,670
1985	1,857,945	650,280	325,140	186,900	28,040	214,940
1986	2,062,319	721,811	360,904	207,500	31,130	238,630
1987	2,289,174	801,210	400,604	230,300	34,560	264,860
1988	2,540,983	889,344	444,672	255,700	38,350	294,050
1989	2,820,491	987,171	493,584	283,800	42,550	326,350
1990	3,130,745	1,095,760	547,880	315,000	47,260	362,260
1995[2]	-	-	805,016	462,900	69,440	532,272
2000[2]	-	-	1,182,832	680,100	102,030	782,184

1 1981 through 1990 growth 11% per year compounded.
2 1991 through 2000 growth 8% per year compounded.
3 Containers from East/Gulf Coast Ports to Southern California for local consumption.

SOURCES: 1979-1990 - Ports of Los Angeles and Long Beach
1995 & 2000 - Scott/DHJM Report (1981)
U.S. Department of Commerce

Conversion TEUs to container: $\frac{115}{200} = 0.575$ TEU = Twenty-Foot Equivalent Units

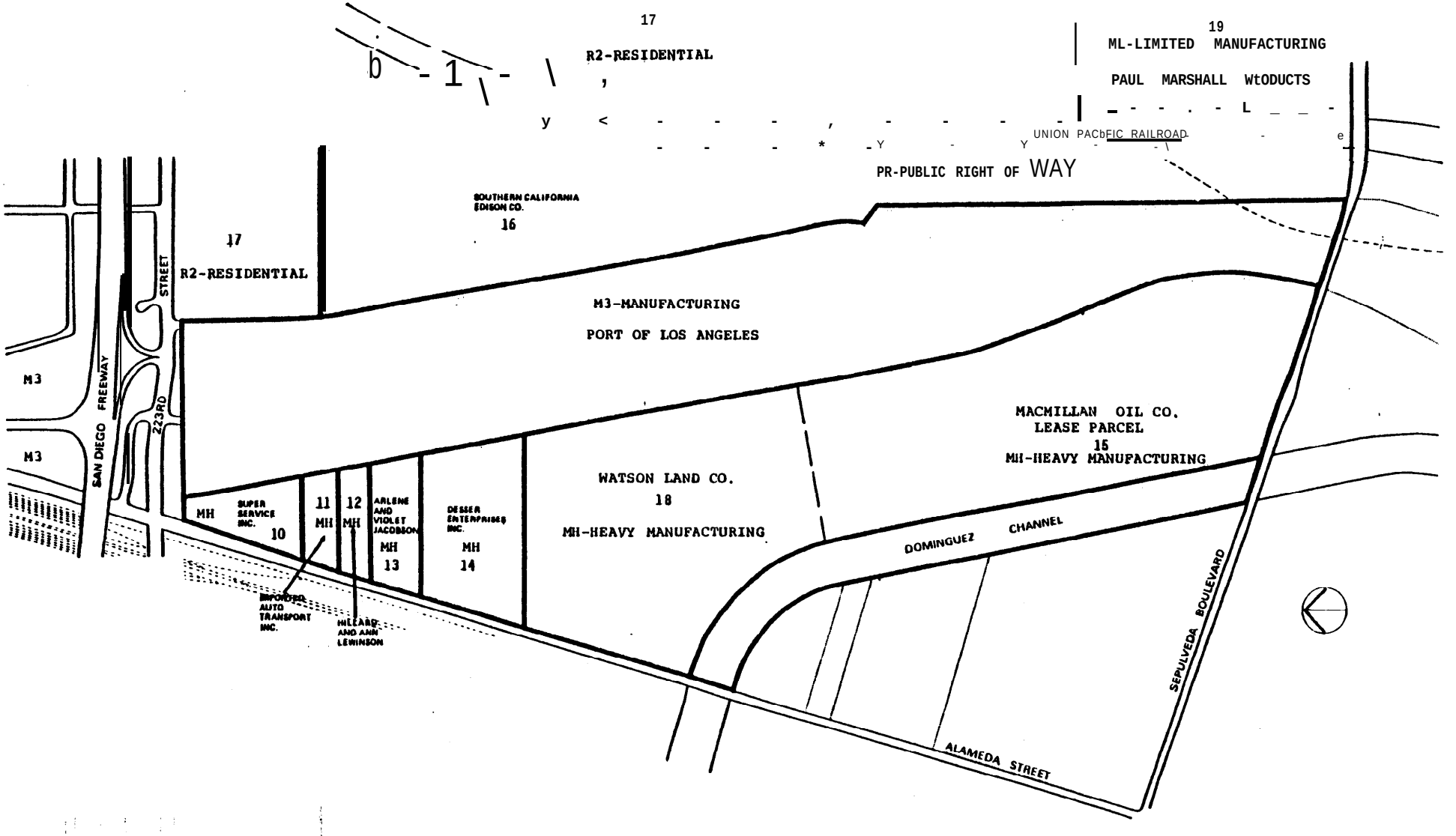


Figure 27
Adjacent Property Ownership And Zoning

2-8/1/1-5	Substitute "Southern California Edison Company has indicated that it is their policy, not to terminate a tenant's prior to the expiration date unless there is just cause for the termination" to read "It is the intent of Edison to periodically renew these licenses until a firm commitment for use of the property is obtained from the Port Authorities and suitable agreements have been reached concerning the terms and conditions of the use. Also, it is the policy of the Edison Company not to terminate a license prior to the expiration date unless there is a cause for the termination such as failure by the tenant to abide by the tens and conditions of the license or the need for use of the property by the Edison Company for public utility purposes."
2-8/1/7	Change "others private owners" to "other private owners".
2-9	Change "Matlock" to "Matlack".
3-1/4/1-3	Change paragraph to read "Project equipment generate significant levels of nitrous oxide-which will exceed the South Coast Air Quality Management District's suggested threshold levels for environmental impact."
3-5/6/1	Change "Construction" to "construction".
3-6	Substitute the Mobile. Emission data given in Table 4 with the revised data provided in the table on the following page.
3-9/3/1-4	Change first sentence to read "Both bridge cranes and yard hostlers will generate nitrogen oxides in quantities which will exceed the SCAQMD suggested threshold levels of significance which is set at 150 pounds per day for the pollutant NO,".
3-9/3/7	Delete "any significant levels of CO from 1993 through 2000."
3-11/5/4	Change "320 double shift," to "320 (double shift),".
3-16/3/2	Add to the end of the sentence "and public transit use".
Section 3.4 pages 3-27 to 3-58	All reference to the "City of Long Beach Noise Ordinance" should be changed to read "applicable noise ordinances",

FROM TABLE 4

MOBILE PROJECT EMISSIONS (lbs/day)

Year	CO	HC	NO	SO	Part
1983	- 68*	54	-709	-43	-43
1984	-117	52	-831	-54	-50
1985	-140	48	-863	-66	-60
1986	-73	92	-666	-52	-56
1987	-132	85	-694	-67	-68
1988	-197	76	-706	-84	-78
1989	-259	76	-748	-102	-91
1990	-241	121	-547	-93	-93
1991	-240	121	-657	-109	-104
1992	-300	115	-788	-126	-115
1993	-361	109	-918	-146	-131
1994	-343	147	-841	-136	-134
1995	-419	139	-1004	-163	-148
1996	-442	135	-1166	-187	-162
1997	-446	174	-1123	-184	-168
1998	-535	167	-1321	-211	-189
1999	-598	159	-1480	-233	-200
2000	-654	186	-1546	-249	-221

*(-) indicates a net benefit to air quality

3-32 and 3-33	Change "refer to Table 17" to "refer to Table 15".
3-34	Change title "Noise Measurement Data Sumnary for the Study Area" to "Noise Locations, Distances and Sampling Times".
3-3712131	Change "Tables 87 and 88" to "Tables 62 and 83".
3-3-7/Z/4	Change "(L_l and L_{ro})" to "(Ll)".
3-451514	Change "noise levels without the ICTF" to "noi se levels with the ICTF".
3-51/l/4	Change "existed CNEL" to "existing CNEL".
3-51/2/a	Change "CNEL studies" to "CNEL values".
3-51/2/10	Change "ultimate CNEL expected" to "CNEL expected by the year 2000".
3-51/5/3	Change "(as indicated above)" to "(given in the mitigation section)".
3-53/2/l	Change "Tables 14 and 21" to "Table 21"
3-83	Label figure as "Figure 40".
3-84/2/4	Change "at or ner" to 'dt or near".
3-84/2/a	Change "long duatfon" to "long duration".
3-841514	To the end of the sentence add "is low".
3-95/2/2	Change "to the Ports. It was "to the Ports, it was".
3-96	Label figure as "Figure 41".
3-99	Change "Figure 45" to "Figure 46".
3-104/6/3	Change "ICTF trains" to "ICTF train movements".
3423/l/8 & 3-1241413	Change "response distance of 7.25 mi. and 9.5 mi." to "response distance of 3.5 and 4.5 mi."
5-9/l/3	Change "Facts tha effect" to "Facts that effect".
5-9/l/4-5	Change the United Statees and wonk" to "Federal, State and local".
5-9/l/6	Change "thaty" to "that".

5-9/1/8	Change "rteduced'! to "reduced".
5-9/1/9	Change "environmetnal" to Yenvironmental ".
6-12	Add a column indicating number of bridge cranes as follows: 1983-4 1987-5 1991-7 1995-10 1999-12 1984-4 1988-6 1992-8 1996-11 2000-12 1985-4 1989-6 1993-9 1997-12 1986-5 1990-6 1994-9 1998-12
6-33	Change “Average daily based on sixth day per week" to "Average daily based on six days per week".

LIST OF **PERSONS,** ORGANIZATIONS **AND PUBLIC** AGENCIES PROVIDING **COMMENTS ON THE DRAFT EIR.**

A. Testimony given at the **Public Hearing held on June 21, 1982.**

Response No.	Comment(s) Received From:
1-4	Mr. Gilbert Jacobsen Carson Auto Wrecking
5-17	Mr. Robert Wilson MacMillian Ring-Free Oil Company
18-26	Mrs. Joanne Williams Windward Village Mobile Park Homeowners Organization

B. Letters Not Requiring Responses

Comments Received From:
Mr. Ralph Pisapia U.S. Fish and Wildlife Service
Mr. Carl Enson U.S. Army Corp of Engineers
Mr. Arch Crouch City of Los Angeles, dept. of Planning
Mr. Glen Smith The Metropolitan Water District of Southern California

c. Letters Requiring Responses

Response No.	Comments Received From:
Refer to Specific Commenting Agency	Mr. Charles Brandes California State Clearinghouse
27-33	Mr. James Pott City of Long Beach, Department of Public Works
34-38	Mr. T. A. Tidemanson/Mr. C.E. Bugh County of Los Angeles Road Department

C. Letters Requiring Responses (Cont.)

Response No.	Comments Received From:
39	Mr. Raymond Hertel California Regional Water Quality Control Board, Los Angeles Region
40	Los Angeles County Flood Control Dist.
41-42	Mr. T. K. Prime City of Los Angeles, Department of Transportation
43-51	Mr. Robert Paternoster City of Long Beach, Department of Planning and Building
52-60	Mrs. Joanne Williams Windward Village Homeowners Organization
61-69	Mr. K. D. Steele California Department of Transportation District 07
70-73	Mr. Robert Jensen Southern California Edison Company
74-75	Mr. W. L. Oliver California Public Utilities Commission
76-77	Mr. Phil King City of Los Angeles, Department of Public Works
78-144	Mr. Jerry Engelhardt Macmillan Ring-Free Oil Co., Inc.
145	Mr. Rick Richmond Los Angeles County Transportation Commission
146	Chief Donald Mel10 City of Los Angeles, Fire Department

Public Hearing Testimony of Mr. Gilbert Jacobsen,
Owner/Manager
Carson Auto Wrecking
22606 South Alameda Street
Carson, California

My name is Gilbert Jacobsen and I am Owner/Manager of Carson Auto Wrecking at 22606 South Alameda Street, Carson California which will be adjacent to your development. I didn't formulate any notes or letters. I have been reading this thing (ICTF EIR) now more than Time Magazine. I have been at that location for approximately 20 years. In that time we've seen the Goodyear Blimp crash on our telephone poles and-burn them down, and last year we've seen two fatalities in truck accidents because the speed limit on Alameda Street is now 50 m.p.h. and cannot facilitate that type of activity. We have been asked to leave our premises twice that I can recall in that period of time because of chemical companies around us emitting sulpher dioxide, etc. Our rabbits have been relocated; our rats have been relocated, etc. I am for progress and I do believe to consolidate a unit like this in one location it would be to everyone's advantage. In trying to conclude from some kind of ideas you're putting forth here, a project of this magnitude is beyond my comprehension. There are some things that bother me and in your appendix section 645, you have the no-highway alternative. There is a statement made that Alameda Street traffic volumes will be doubled by today's averages, by I guess the year 2000. Well, their telling us these things and you're telling us that you're going to propose to make it an expressway. I, as a layman, do not know what an expressway 1

is. If you're going to increase the speed limit of Alameda Street that would be incorrect to do. I don't know if you're going to widen the street, narrow the street, make two streets
2 or what, you don't tell us what you're going to do. Again, I am in the middle of it. My problem, or my future concern would
3 be the accessability to my business and how it will effect my customers who pull up in front everyday and transfer dollars. There is an intersection of Carson and Alameda Street which would be at your northern(?) under Alameda Street grading. They put up the overpass at 223rd Street a few years ago to facilitate the people getting off of work in that area so they would not be sitting by a railroad crossing for literally an hour waiting for the trains to cross 223rd Street. And at great expense to the taxpayer, and a great convenience to the worker, they finally facilitated us by putting in an overpass at 223rd to get across Alameda Street. The traffic
4 congestion at the intersection of Carson and Alameda Street is sometimes impossible when trains are moving across there. If you're going to increase the railroad burden on that line and not do something to facilitate an under to over pass at Carson Street leading to Alameda Street, you will never be able to cross it. Thank you for your time.

My name is Robert Wilson, Assistant Vice President of Macmillan Ring-Free Oil Co-, Inc. Our address is 2365 E. Sepulveda Blvd., Carson.

Since 1969, I have been working with the people in the Ports of Los Angeles and Long Beach on projects for the company in both harbors. As the 1978 President and one of the original Board of Directors of the Harbor Association of Industry and Commerce, I have worked continually to promote industry and commerce in the entire harbor area. I have made many friends in both Harbor Departments and honestly believe that the people I have dealth with are the greatest in any governmental service.

Now, I must take a stand against a project sponsored by both Harbor Departments. First, because of the adverse effect on the company I represent, and also because I believe it will have a negative impact on the public in the surrounding area. I believe that the Draft EIR is inadequate and contains conflicting statements. For example, in the Executive Summary, one of the beneficial impacts quoted is that it will provide positive impacts on the local economy. 5
Yet, on page 3-73, it says there are little economic benefits to the community on the site.

In the Project Location Description, you state that the east and west boundaries are the City of Los Angeles city limits. You should make it clear that the west boundary of the project will require purchasing of 15 acres of 6
land located in the City of Carson. On page l-l, you say that Macmillan has a "bulk liquid storage facility." That is only part of the use of the property. In 1965, Macmillan leased the property for the purpose of building a new modern refinery. All of the discretionary permits have been issued

for a 40,000 bbls per day refinery. We have been building in an incremental fashion since 1969. You could say that part of our present operation is an "intermodal transfer facility." We receive liquid petroleum products by pipeline and transfer them to trucks for distribution. We also blend gasoline and gasohol at the site. Our offices for the entire western division of Macmillan are located on the site. Macmillan has much more than just a "bulk liquid storage facility" on the site. There is even a more important
7 questi on, "What if the land occupied by Macmillan cannot be purchased without instituting. condemnation proceedings?"

8 More information needs to be provided on the adjacent property ownership (page 2-7, Figure 27), and the impact on the residents along the east boundary of the project. A zoning map of the area should be included. All of the adjacent property is not shown in Figure 27.

Now just a few comments on the economics. (In consideration to you and the people here, I have tried to make my comments today as brief as possible. He will submit in writing, for the record, our comments in greater detail.)
9 I will only deal with the information contained in the Draft EIR. Page 3-73 states that the cost per container will be reduced. by $48.20 due to truck transportation savings. That is a meaningless figure. What is needed is a comparison between the ambient and proposed conditions. On page 3-76, Table 22, the estimated cost for improvements only is $130,441,000.00. 10% per annum interest, that is $13,000,000 per year in interest only. Land costs on 260 acres at today's market would be about $5,000,000 per year. Dividing $18,000,000 by the estimated number of containers handled per year of 174,400 (page 6-33), that is an added cost for interest and land only of $103.00 per container. To be meaningful, we must be able to compare

those costs with the existing operating costs. The data contained is totally inadequate. Quoting from the EIR section dealing with regional transportation plans on page 21, the Transportation Department recognizes several congestion and capacity problems. On page 2-12, the Transportation Element of the General Plan of the Port of Long Beach recommends that Route 47 should be extended to the San Diego Freeway. AB 3375 (Elder) if adopted will rescind the Route 47 extension. That has not yet been resolved., Since the Route 47 location has not been resolved, before proceeding with the proposed ICTF project, at minimum, the EIR should contain analysis of the impacts on the ICTF project associated with alternate sites, if Route 47 is adopted through the proposed ICTF site. 10

The traffic impact is one of the greatest adverse impacts on the site area. The Transportation Departments recognize that a problem already exists in the area, how many trucks per second will be added to the problem? The estimated round trips by truck in 1983 (page 3-73) will be 413, and in the year 2000, 1844, repeat 1844. Four hundred thirteen trips to me means that a truck enters Sepulveda 413 times and leaves 413 times. That is 826 times either in or out during an 8 hour period, or one truck every 30 seconds. In the year 2000, they project 1844 round trips per day.. That is 3688 times on or off Sepulveda in a 24 hour period or 153 trucks per hour, or one truck every 24 seconds 24 hours per day.

Table No. 30 shows 15 grade crossings in the area with delays of 17 to 90 minutes per crossing. I did not see any mention of the traffic problem caused by trains crossing Sepulveda. How many trains will cross Sepulveda per day and how long will be the delay per crossing? The Draft EIR should 11

present more of the facts on the traffic conditions. What about the impact on the people and businesses located on other streets in the area when traffic
12 is diverted to avoid delays OR Sepulveda Boulevard? Or the economic impact on Macmillan because they can not get trucks in and out of their facility due to traffic congestion? AS mitigation for the traffic congestion created, a grade separation on Alameda Street is proposed (viii), yet there is no existing grade crossing. So what is mitigating about increasing traffic problems. I believe that CEQA requires any governmental body effected by
13 a project must be involved in the EIR, the City of Carson and the County of Los Angeles. There is an existing grade separation on Alameda Street between Sepulveda Boulevard and Pacific Coast Highway. During heavy rains Alameda Street is closed in that section because it is flooded. Another flooded grade separation at 223rd Street, the proposed additional grade separation, would really create chaos for the entire area as well as the City of Carson. Another proposed mitigation is SCAGs program of highway
14 improvements if implemented (viii). How do we know that it will <u>ever</u> be Implemented.

The EIR should contain more data on proposed measures to insure the safety
15 of the people surrounding the area. How do you propose to deal with a possible hazardous material spill? The lights and glare at night could create a traffic safety problem on Sepulveda Boulevard.

16 Many regulatory approvals may or may not be needed. These should be discussed in the EIR. Also, the EIR does not address the "limited action" alternative required for an EIR under CEQA.

These concerns about site location, economics, safety and traffic are only a few of the areas in the Draft EIR where information is inadequate. I urge you to re-write the document to provide detailed information on all of the significant impacts associated with the project. The entire document should be revised to reflect the expanded and revised studies. 17

Windward Village Mobile Park
3495 Santa Fe Ave.
Long Z-each, Ca. ~G810
Homeomers Org. Sp.#45
June 21, 1962

Leland 3. Hill, Director of Tort Planning
Fort of Long Beach.
W. Calvin Hurst, Harbor Enviromental Scientist
Fort of Los Angeles

Subject: intermodal Container Transfer Facility

Gentlemen:

We the residents of Windward Village Mobile Park are here to protest the development of the Intermodal Container Transfer Facility. I have read with great interest the EIR Draft on this facility and must bring to your attention several laxities in this report. Great emphasis is made that this is undeveloped land. Very little emphasis is given to the private residential areas that will be affected if this yard is installed.

The air quality summary section cites that yearly operaticcal equipment will almost double in 7 years. This means an almost 200% increase in pollutants to surrounding areas since we will have the vehicle emissions from the diesel trucks using the entrances and the surrounding street.+ Also no allowance was given on vehicular traffic increase due to the new industrial park being completed on the North-West corner of the San Diego and Long Beach interchange. This complex is not even completed as yet and from 3:30 to 5:30 P.M. it is next to impossible to get out onto Santa Fe Ave. from our exit. 18

The report states new residential construction should 'se insulated from noise, but where could that new construction take place. More emphasis should be given to ground vibration,. The current ground vibration we are having now is causing severe problems to our hones. Leaking pipes, the unleveling of our hones, pictures tilting, glasses vibrating off shelves, one tenant had floor seperation in their kitchen due to vibration. 19 20

All construction equipment exceeds the safe level of sound. The impact on the emissions from this equipment cannot honestly be rated. is only a guess. Residential locations B and C are now under tremendous strain due to the increase of the Union Pacific tracks. On every sound sensor test made the Union Pacific was advised in advance, and in everv instance there was a decrease to coincide with the testing. Even then the noise level started at over 75 D.B.A., highly unacceptable. Since these results are available to you how can you even con&icier more noise be added with this project? 21

Sound barrier walls would contain some of the noise but we already have a 6 foot wall and with the variance in the ground level the 11 footwalls mentioned would only cover the wheels of the freight cars.

With the expansion of the Port of Long Beach, the Union Pacific projects 15 to 20 coal trains per day, add in the Los Angeles harbor expansion this another 8 to 10 coal trains, then you must consider th
22 regular freight trains 2 or 3 a day, since each train means 2 passing per day this is approximately 50 passings per day, thats about every 28 minutes we breath diesel, vibrate off our foundations and watch our homes deteriorate is value.

It should also be brought to your attention the lack of control of the railroads. There is no one body for this. No federal, state, or local agency wishes to be responsible. You are constantly being refered to another office or agency. I have enclosed a letter I have just recieved from the City Attorney of Long Beach reporting to the Council his findings on this; You can only suggest. We have repeatedly requested freight cars not be left on the siding next to
23 our wall, because the childern climb up and walk along and throw rocks breaking windows. We have repeatedly requested some security checks in the area, we have requested no whistle blowing next to our wall, (we're more than 500 ft. from the crossing), especially at night, we have requested the trains to slow and be more careful in switching. The only thing is an easing of the speed, and the whistle blowing for 1 or 2 weeks, then its just back the way it was before we called it to their attention. Who do we turn to for assistance in these matters. No one has or wants to enforce the rules governing the railroad activity.

With the instalation of this container facility you are not solving
24 any pollution problems, you are only moving them from one area to another. This will enable the polluants to spread over an even wider area and affect even more people.

Your report is full of "ifs", if this type of switching is done, if this retardent is used on the engines, if, if. This facility is a threat to human life. There can be no ifs. If this facility is
25 approved then all "ifs" must be changed to mandates. Make sure you have proper inspections of equipment and the authority to enforce them.

It is projected that this facility will handle 600,00 containers per year, 5% to be chemical containers. This breaks down to approximatel
26 35 chemical containers a day. We have one exit from our park. Shoul 1 of the chemical cars start leaking or explode how will over 300 cars get out of that 1 exit with any speed.

I would like to add one more if to your draft. If one of the chemica cars should leak and the wind is from the south-west as is usual, the three or four hundred poeple could be affected within 2 minutes. Affected so badly they could be dead.

Donot install this facility here. Donot endanger our lives. Donot take our investments in our homes from us.

Thank you,

Mrs. Joanne Williams
Windward Village Homeowners Org.

CITY OF LONG B-EACH
DEPARTMENT OF PLANNING & BUILDING
333 WEST OCEAN BLVD. . LONG BEACH, CALIFORNIA 90802
(213) 5804631

June 1, 1982

"This letter was submitted with the letter from Windward Village dated 6-21-82."

Honorable Mayor and City Council
City of Long Beach,
California

Subject: Complaint of Windward Village Residents Regarding Union Pacific Operations - Potential Violation of Environmental Impact Report

An Environmental Impact Report was prepared and certified by the City Planning Commission on December 4, 1975.

At the time of preparration of the EIR, the railroad line was utilized for two round trips daily (between 8:00 a.m. - 12:00 noon, the second trip between the hours of 2:00 p.m. - 5:00 p.m.). The line was not utilized after dark.

An additional rail line was installed subsequent to the construction of Windward Village. During the ensuing years rail usage has sporadically but cumulatively increase throughout day and evening hours- Currently approximately 10-12 round trips occur daily. Future usage will likely increase to 80-100 trips daily depending upon final plans of the ports of Los Angeles and Long Beach.

The EIR addressed the existing ambient noise environment and found the site to be influenced by three noise sources:

- noise generated by the railroad.
- noise generated by aircraft overflight.
- noise generated by traffic on adjacent streets.

The EIR found that noises generated from use of the railroad was in excess of 80 dBA (70 dBA is speach interference level) (p. 45). Although the report did not project future use of the line, the report did anticipate that the railroad generated noise would be "excessively annoying." The document further stated that "Residents, especially those occupying units along the western property line, till regularly be subject to sound and vibration impacts of railroad cars" (p.91). The EIR did not require mitigation measures to reduce noise. Bather, the document provided guidance to the applicant:

> "It is strongly urged that prospective tenants be made cognizant of the use of this (Railroad) track" (p. 98).

The applicant, Myron Reichert of Continental Mobile Housing, 650 North Beach Boulevard, La. Habra, concurred with this condition at the Commission Hearing.

Analysis:

The environmental analysis of Windward-Village was binding upon the applicant: American Cold Star Home and Continental Mobile Housing Inc. The report did not control the usage of rail lines nor the construtionof the additional line. This is under the jurisdiction of the California Public Utilities Commission.

The mitigation measure which "strongly urged" that the applicant inform the tenants of railroad noise is, by its language, not mandated. However, staff has coatacted the management of the park and has been informed that Continental Housing does indeed comply with the condition. On the other hand, outside salesmen and brokerage houses do not so notice the prospective buyers. This situation can likely be corrected by management techniques.

Conclusion:

Staff has reviewed the EIR and has compared the document with Windward Village as it has been built. We have found no violations of the Environmental Impact Report nor the litigation measures.

Respectfully submitted,

Robert J. Paternoster
Director of Planning and Buildfng

RJkjR
attachment

MEMORANDUM

date June 15, 1982

to Mayor and City Council

from Robert W. Parkin, City Attorney

subject Complaint of Windward Village Residents regarding Union Pacific Operations Near Their Homes

"This letter was submitted with the letter from Windward Village dated 6-21-82."

At your meeting of May 18, 1982, you referred to this office, as well as the offices of City Prosecutor and City Manager, the complaint of the residents at Windward Village Mobile Home Park regarding trains operating on tracks adjacent to the park. We have attempted to determine which agencies are responsible for enforcement of the several alleged violations which make up the complaints.

Noise regulations 'are issued and enforced by the Federal Railroad Administration. Air pollution is regulated and enforced by the Southern California Air Quality Management District. Speed is regulated by the Public Utilties Commission, although a local agency may adopt its own ordinance regulating the speed of trains within its jurisdictional limits provided that the ordinance is first approved by the Public Utilties Commission. (Although Long Beach has such an ordinance, it has not obtained the-required PUC approval.) Once such an ordinance has been approved, it may be enforced. Public Utilities Commission General Order No. 135 provides that trains may not block a grade crossing for more than 10 minutes unless no vehicle or pedestrian is waiting at the crossing. This can be enforced by the City in accordance with the provisions of the General Order.

Long Beach Municipal Code Section 14.24.010 places a 5 minute limitation on blocking a grade crossing, but this section, in our opinion, has been preempted by the above-referenced General Order.

Long Beach Municipal Code Section 14.24.060 permits switching of trains between the hours of 7:OO A.M. and 11:OO A.M., only, unless the switching takes place in an industrial area where there is no such time limit. This section is of doubtfulvalidity, since it could be construed to be an undue interference with interstate commerce because of the limited hours when switching is permitted. If switching becomes a major source of complaint at the mobile home park, an attempt should be

made to amend this section so that it cannot be construed as being an unreasonable regulation of commerce.

I trust the foregoing addresses the questions which were raised at the City Council meeting of May 18th, but if any of you have further questions, please feel free to call me.

Very truly yours,

ROBERT W. PARKIN
City Attorney

RWP:jw

cc: John E. Dever
John A. Vander Lans
Councilmembers (9)

United States Department of the Interior.

FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
24000 Avila Road
Laguna Niguel, CA 92677

June 16, 1982

W. Calvin Hurst
Harbor Environmental Scientist
Port of Los Angeles
P.O. Box 151
San Pedro, CA 90733

Leland R. Hill
Director of Port Planning
Port of Long Beach
P.O. Box 570
Long Beach, CA 90801

Re: DEIR Intermodal Container Transfer Facility
SCH No. 81100215

Gentlemen:

This responds to your request dated May 26, 1982 in regards to the referenced project.

We are unable at this time to respond to this request due to funding and manpower constraints. This does not preclude input at a later date should significant impacts to public fish and wildlife resources be identified, and funding and manpower resources be increased.

Sincerely yours,

Ralph C. Pisapia
Field Supervisor

cc: CE, Los Angeles, CA (Attn: Planning Div.)
CCC, San Francisco, CA
CDFG, Reg. 5, Long Beach, CA

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT. CORPS OF ENGINEERS
P. 0. B0X 2711
LOS ANGELES. CALIFORNIA @OOS2

SPLPD-E

3 &L 17,;;

Mr. w. Calvin Hurst
Harbor Environmental Scientist
Los Angeles Harbor Department
P.O. Box 151
San Pedro, California 90733

Dear Mr. Hurst:

This is in response to a letter from your office which requested review and comments on the Draft Environmental Impact Report (DEIR) for the Intermodal Container Transfer Facility.

A study on "San Pedro Bay Ports Transportation" is currently being conducted by the Corps of Engineers, Los Angeles District. At this writing, there appears to be no conflict between the proposed plan and our study. Therefore, we have no comments on the DEIR.

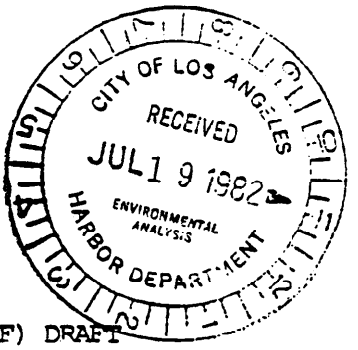
Thank you for the opportunity to review and comment on this document.

Sincerely,

CARL F. ENSON
Acting Chief, Planning Division

FORM GEN. 160 (Rev. 3-78)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE



Date: **July 15,** 1982

To: W. Calvin Hurst
Harbor Environmental Scientist

From: Arch D. Crouch
Principal City Planner

Subject: COMMENTS — INTERMODAL CONTAINER TRANSFER FACILITY (ICTF) DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

The The proposed Intermodal Container Transfer Facility is in conformance **with the** the Part of Los Angeles Proposed Plan, a part of the City of Los Angeles General Plan, as referenced on page 2-10 of the Draft EIR.

ADC:LF:lf

The Metropolitan Water *District of Southern California*

AUG 9 1982

Mr. Arthur B. Goodwin
Project Manager
Port of Los Angeles
P. 0. Box 151
San Pedro, California 90151

Dear Mr. Goodwin:

Intramodal Container Transfer Facility (ICTF) Draft EIR

Metropolitan has reviewed your Draft EIR dated June 1982.

We note that your Draft EIR correctly identifies Metropolitan's 45-inch-inside-diameter (Victoria 223rd St.) feeder, and our 37-inch-inside-diameter (Long Beach) lateral, and ensures protection of our facilities under the statement made in Chapter 3.11.5 (Mitigations).

Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan review and consider the Final EIR prepared for the proposed project. In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the lead agency, it is requested that you furnish us two copies of the Final EIR, together with two certified copies of the Ports of Long Beach and Los Angeles (co-lead agencies) resolutions of approval of the proposed project.

If you have any questions please contact me at (213) 250-6000, extension 455.

Very truly yours,

Glen W. Smith
Environmental Planning Branch

DAM/rg

1111 Sunset Boulevard, Los Angeles, Calif. / Mailing address: Box 54153, Los Angeles, Calif. 90054/Telephone: (213) 250-6000

State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

EDMUND G. BROWN JR.
GOVERNOR

(916/445-0613)

July 23, 1982

Mr. W. Calvin Hurst
Los Angeles Harbor Department
and Long Beach Harbor Department

RE: SCH# 81100215 - Intermodal Container Transfer Facility Draft EIR

Dear Mr. Hurst:

The State Clearinghouse has completed review of the Intermodal Container Transfer Facility Draft EIR. Comments from State agencies are attached, and highlighted below. Please contact appropriate agency staff if you have any questions.

Public Utilities Commission

The draft EIR does not explicitly discuss the magnitude of the impacts nor are there positive statements or specifics relative to mitigation regarding Section 3.8 - Transportation and Circulation, rail and traffic impacts resulting from increased rail activity. The report does not address several material issues including future study parameters, accident potential, alternative improvements, cost or financial responsibility (Table 30). There are general references to predicators, warning device improvements and grade separations, but without specific proposals no adequate review can be made.

It is necessary to quantitatively determine or at least narrow the potentially significant impacts and develop a list of positive mitigating steps.

Regional Water Quality Control Board

The draft EIR adequately addresses the comments the Board made on the Notice of Preparation for this project. Since the discharge might contain pollutants, an NPDES permit may be required. When the project is finalized, the Ports should provide the Board with sufficient information regarding the character of the discharge and proposed mitigation measures to allow the Board to make this determination. This information should be submitted at least six months prior to the commencement of the discharge.

Department of Transportation

The conclusion on page3-25 that an insignificant wildlife population loss will occur is inaccurate since wile displaced from a project site moves to another site, exceeding the carrying capacity of that site. Intensifed competition results and mortality occurs until the wildlife populations on the remaining sites are again in balance.

Provisions for alternatives to single-occupant automobiles for employees should be encouraged. Strategies for buses, carpools, vanpools ahd other transit services should be incorporated into the draft document mitigation measure section to reduce traffic impacts.

Construction permit issuance regarding the San Diego Freeway and the Terminal Island Freeway will be needed where appropriate.

The discussion in the Transportation Planning section, pages l-4, should include the expressed, regional Land state need for public transit on the Wilmington Line

The Department reviewed and offers further comments *on the* ICTF Plans by SCOTT/DMJM dated March 15, 1982.

State Clearinghouse

When preparing the final EIR you must include all comments and responses (CEQA) Guidelines, Section l5l46). The certified EIR must be consider& in the decision-making process for the project. In addition, we urge you to respond directly to the agencies' comments by writing to them, including the State Clearinghouse on all correspondence.

A recent Appellate Court decision in w v-m- StWKhW clarified requirements for responding to review comments. Specifically, the court indicated that comments must be addressed in detail, giving reasons why the specific comments and suggestions were not accepted. The responses should indicate any factors of overriding significance which required the suggestions or comments to be rejected. Responses to comments must not be conclusory statements but must be supported by empirical or experimental data, scientific authority or explanatory information. The court further said that the response must be a good faith, reasoned analysis.

Section l5002 (f) of the CEQA Guidelines requires that a governmental agency take certain actions if an EIR shows substantial adverse environmental impacts could result from a project, These actions include changing the project, imposing conditions on the project, adopting plans or ordinances to avoid the problem, selecting an alternative to the project, or disapproving the project. In the event that the project is approved without adequate mitigationof significant effects, the lead agency must make written findings for each significant effect (Section 15088) and it must support its actionswith a

written statement of overriding considerations for each unmitigated significant effect (Section 15089).

If the project requires discretionary approval from any stateagency, the Notice of Determination must be filedwith the Secretary for Resources, as well as with the County Clerk.

Please Contact Debora Fudge at (916) 445-0613 if you have any questions.

Sincerely,

Charles E. Brandes
Deputy Director
Projects Coordination

Debora Fudge
State Clearinghouse

CEB/df
attachments

cc: Ken.FeUows, BIR

y.3. sdn 5:

Public Utilities Commission

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July 15, 1982

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JUL 1 9 1982

frcMR.Flirl
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Lary Beach Ehrbor Departprot Btliulng
l 925 mrbor Plaza
L=SBt-, CMO-

State Clearinghouse

This letter was submitted ?*am t State' Clearinghouse. See the let from the specific agency."

Dear Mr. Hill:

This refers to them the Draft Environmental Impact Report far the proposed Intermodal container Transfer Facility prepared by the Harbor Departments of Long Beach and Los Angeles. We are responding as a responsible agency for the proposed railroad. highway grade separations at Alameda St., Interstate By 405, 223rd St. and 223rd St. ramp and the proposed grades crossing at Sepulveda Blvd., and as the state agency responsible for rail-highway grade crossing safety.

The staff has no comment on the proposed separating of the Southern Pacific Transportation Company at the rail entrance to the property. As pointed out in the Draft EIR construction authority will, be required for each of the four crossings. Application requirements for such a project are set forth in Rule 38 of the Commission's Rules of Practice and Procedure (Title 20 of the California Administrative Code). All four separations should be included in one application.

We do have some concerns with regard to the proposed grade crossing of the Southern Pacific together with the existing Union Pacific track near the truck entrance at Sepulveda Blvd. The staff would suggest that cantilever lights be used in addition to the flashing lights with automatic gates mentioned in the draft on both approaches, and that care be taken in signal location to provide adequate sight distance; especially for north bound vehicles turning left out of the Port of Los Angeles property marked "Terminal Island Freeway" on Figure 15, page 1-24.

Our real concern is with the discussion in Section *3.8*-Transportation and Circulation, relative to the rail impacts and traffic impacts resulting from increased rail activity. The Commission has no permit authority over the additional trains, however, we are the agency responsible for grade crossing safety and we agree with the report that the incremental increase will have potential adverse impacts in traffic delay at at grade crossings and accidents, both train involved and non-train involved. Unfortunately, the draft places the Commission, as a reviewer, in a slightly awkward position. The report is premature in the sense that the magnitude of the impact are not explicitly discussed nor are there positive statements or specifics relative to migitation. In the report a traffic study (Table 30) identifies a list or grade crossings for further vehicular traffic delay study but does not address several material issues including future study parameters, accident potential, alternative improvements, cost or financial responsibility. There are, in the report, general references to predictors, warning device improvements and grade separations, but without specific proposals no adequate review can be effected.

On the bottom of page 3-80 the draft contends that "Improved crossing protection or grade separation construction at grade crossing as recommended by the PUC would reduce the rail associated impacts." The Commission staff would welcome the opportunity to participate in an evaluation of the proposed rail lines, but does feel that the entities with financial responsibility, mainly the railroad and local agencies, should also be involved.

The Grade Separation priority List developed by this Commission is a permissive list and constitutes funding for only approximately one-half of the grade separations constructed each year. The list is the result of local and Caltrans initiated nominations and is not necessarily exhaustive. The Commission assesses 90 per cent of the cost of a grade separation to eliminate an existing grade crossing to the moving party, usually the local agency, and 10 per cent to the other party, usually railroad. The Grade Separation Fund contributes 80 per cent to those few projects high enough to quality.

The crossing improvement list is developed strictly for the allocation of Federal Funds provided from the various Highway Safety Act. Unfortunately it appears that Federal Funds till no longer be specifically earmarked for crossing projects. For projects that do nut include Federal Funds, the cost of protection installation is usually divided equally between local agency and railroad.

The Commission certainly appreciates that this project will only contribute incrementally to the rail related issues already existing and we do not want to burden this worthwhile project with undue costs, however, we do feel it necessary to quantitatively determine or at least narrow the potentially significant impacts and develop a list of positive mitigating steps. We will certainly participate in or direct an evaluation of the affected grade crossings and coordinate disposition of the proposed improvements including resolution of financial responsibility.

Very truly yours,

W. L. Clark

YOL, aLI?Jm, mcQ8l
Rat3rmd Operations b SMety Bmnch
~tiOnDi'lrl6iOlX

cc: Debbie h&e

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smmment0, CA 95814

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SYATR OC CAUKJRMA-RRSOURCES AGENCY EDMUNO G. BROWN JR.. G-o

CALIFORNIA REGIONAL WATER QUAUN CONTROL BOARD-
LOS ANGELES REGlON
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LOS ANGUS. W~RNIA mow4596
(213) 6204460

JUN 241982

"This letter was submitted from th State Clearinghouse. See the lette from the specific agency."

Mr. James W. Burns
Assistant Secretary for Resources
Resources *Agency,* 13th *Floor*
Resources Building
Sacramento, California 95814

RE: Draft Environmental Impact Report for the Intermodal Container Transfer Facility, Dated June 1982. SCH #81l00215

Gentlemen:

We have reviewed the subject document concerning the proposed construction of a rail yard for the transfer of marine-oriented containers. The project, jointly proposed by the Ports of Los Angeles and Long Beach, will be located on a 260-acre site near the northerly terminus of the Terminal Island Freeway.

The entire project site will. be paved, and rain water runoff will be discharged into Dominguez Channel. The water quality of this discharge is expected to be typical of pavement runoff. Oil and grease traps will be incorporated into the storm drains within the maintenance areas. Spill containment controls will be incorporated to prevent spills from reaching the channel.

We previously commented on the Notice of Preparation for the Draft Environmental Impact Report for this project on October 5, 1981 and October 22, 1981, expressing topics of concern to this Board. In general, the DEIR adequately addresses our concerns.

Inasmuch as this discharge might contain pollutants, 'an NPDES permit may be required. When the project is finalized, the Ports should provide the Board with sufficient information regarding the character of the discharge and proposed mitigation measures to allow us to make this determination. This information should be submitted at least six months prior to the commencement of the discharge.

If you have any questions, please call Dr. Lewis A. Schinazi or Taira Yoshimura of my staff at the above telephone number.

Very truly yours,

RAYMOND M. HERTEL
Executive Officer

RECEIVED
JUL 30 1982

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cc: *State* Cleeghwe, mm: Dorothy Feher
Port of Los Angeles, AmkIt W. Calvin Eurst, Harbor Eriviroxmnental Scientist
Port of Long Beach, ATTN: Lekuxi R. Kill, OFrector of Port Planning

State of California

BuJnb;;C;; Transportation and Housing Agency

M e m o r a n d u m

To : ANN BARKLEY, Division Chief- DOTP
Department A-95 Coordinator
ll20 N street
Sacramento, California 958l4

Attention: Darrell Husum

- JuLy 13, 1982

me: A-95 RFpIEl+7

"This letter was submitted from the ,State Clearinghouse.See the letter from the specific agency."

From : E E STEEIZ - D&t 07
DEPARTMENT OF TRANSPORTATION

Subject Project Review Comments

SCH NUMBER

81100215

Proposed: titermodal Container Trakfer Facfl~tv(I.C,T.F.\ L;A.. CA.

We have received and reviewed the Draft EIR an the above project and have the following comments:

Environmental

Document location	Comments
Page l-8, Paragraph 1 Page 3-10, Table 7 Page 3-13,- Table 9	In each of the three document locations, the yearly operation emissions are based on a 365 day year: However, since the ICTF will operate a 2 shift 5 day week, this is a 260 day year
Page 3-25	The statement that most of the wildlife currently living on the project site would move off the site to other locations if the project is built is inaccurate. The size of wildlife population is dependent on the quantity and quality of its habitat; At any given time, each habitat usually has a wildlife population close to its carrying capacity';; When wildlife is displaced from a project site the carrying capacity of nearby sites is exceeded Intensified competition results and mortality occurs until the wildlife populations on the remaining sites are again In balance with the constraints of the habitats; The conclusion in question should be that an insignificant wildlife population Loss will occur';

General reference	With respect to the employees of the project, provisions *for alternatives* to *single-occupant* automobiles shoul be encouraged, Also, possible strategies for encouraging the use c buses, carpool, vanpools or other transit services should be incorp-orated into your study and/or identi fled as mitigation measures to re-duce traffic impacts.
General reference	After environmental clearance is ob-tained, construction and permit issuance regarding the San Diego Fwy and the Terminal Island Fwy. till be needed where appropriate.

The Environmental Planning contact person is Mr. Bill Adams and his telephone number is 620-4364;

Project Development and Traffic Operations

Document location	Comments
Page l-24, Figure 15	The reference to the terminal Island Fwy. in the main part of this figure should be changed to POLA Property.

In addition to the Draft EIR, the ICTF Plans by SCOTT/DMJM dated March 15, 1982 were reviewed by Project Development and the comments are as follows:

Drawing #	comments
2-2 RR Profile	Vertical Clearance scales 22-& Suggest 23' as stated in Planning Manual section 7-309.5
2-5 Plan	Existing Alameda width is 8W; The curb to curb proposed scale is R'. Why?
2-6 Plan	Proposed Ramp to 223rd St? has com-pound horizontal curves'; Why?
2-8 *Alameda Profile*	Office of Structures should review this profile; LA-405 footing may be affected,
2-9 Profile	Proposed Ramp to 223rd St; sight distance is extremely poor; It do not meet State Standards;

3-I to 3-12	The Terminal. Island E%y; term-8 is shown at two locations, Is.the free way going to be split? Clarify';

The Project Development 'D" contact person Is Mr'; Barry Rabbit and his telephone number is 62*W%

Transptrtation Plannting

Dtxtmmt locatiog	comments
Page I-4	The rep& stat&s that ireight movements till be vfa the San Pedro **Branch** and the Wilr&qton Branch. The dlscusslon should I.ncl.ude the expressed local, reglmal and state need for public transit (passenger **service) OR** the WiUaington Line. What,proviaions can be made to accommodate this public need?
Page 3-1 paragraph Page 3-80, BarSgraph 2	Does design and layout preclude the Union Pacffic Railroad from utllL-zing the ETF? The Uhbm .Pacific could gain entry from the south and **there** could be a reduction of trucking to *the Vernon* yard, unless the Icm would be fully utilized by the Southern Pacffic tiilro&d.
hge 3-16, Iast pamgraph	Add to the last paragraph the phrase "and public transit **use** .

TM !kansportatfan Planning cmtsct **person** is HF. Bob Kabel and his te+ephone number is 620-3090;.

We look forward to, the opportunity to review the Final E.I.R.

R. D. STEELE, Chief
E&kmentai Planning Branch
Transportatian District 07
Clearinghouse Coordinatar
Far information, ctmtact Da~ellwood
(ATSS) 640-2246 m (213) 620-2246

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JUL 2 0 1982
State Clearinghouse

Attachment

June 22, 1982

James H. McJunkin, Executive Gen. Mgr., Port of Long Beach

James T. Pott, Director of Public Works

Draft EIR - Intermodal Container Transfer Facility

Attention: Leland R. Hill, Director of Port Planning

This office has reviewed the subject document, submitted under your cover letter of May 26, 1982, and has the following comments:

On Page l-21, item 1.3.2.1.2. - Truck Access

The report states that the transition of the through travel lanes along Sepulveda Blvd./Willow St. has been designed "in accordance with the design standards of the City of Long Beach Traffic Department assuming a design speed of 30 mph." For the record, the City of Long Beach's Transportation Division has never provided referenced design standards and it is believed that the transition should be designed per AASHTO Standards, using prevailing speed on Willow Street at the subject section (which are considerably higher than 30 mph). 27

On Page l-24, Figure 15

1. The proposed Traffic Signal Phase I shows a flash yellow indication for the W/B left turn at POLA property. This is a non-standard type of installation and must be eliminated. 28

2. The south leg of the intersection is POLA property; it has been mislabeled as Terminal Island Freeway. 29

On Page l-25, Figure 16 30

1. The proposed signal phasing and N/B traffic lane assignments made no provision to accommodate the existing N/B and S/B movements which provide access to and from the existing Warehouse/Distribution Center located at 2131 West Willow Street (directly opposite the Terminal Island Freeway).

2. The proposed traffic signal phase III shows a conflict between the N/B left turn and W/B through movements. The W/B through movement should be stopped during this particular phase (this is probably nothing more than a drafting omission).

Draft EIR - Intermodal Container Transfer Facility

3. The existing right-of-way of Willow Street between the Union Pacific Railroad trestle and the Terminal Island Freeway seems insufficient to accommodate both the proposed widening and sidewalk/parkway requirements. A more detailed review and discussion, therefore, is necessary to clarify and assure viability of this proposal.

On Page 3-85, Table 24a

31 The calculated Level of Service "A" for the intersection of Alameda St. and Sepulveda Blvd. during the PM peak hour does not agree with the statement (on page 3-84) which indicates the severe traffic back-up on E/B Sepulveda Blvd. at Alameda Street in the afternoon between 3:30 and 4:00 PM.

32 On Page 6-33, Table Cl

The projected total annual Container Movements to and from the ICTF for 1983 thru 2000 do not agree with the projections. as shown on Table 2 on page l-34.

On Page 6-34, Table C2

33 It is unclear to us why the projected daily truck round trips to/from the ITCF, which include the allowance of 20-40 percent for tractor only, are less than the projected container movement to/from the ITCF as shown on Table Cl on Page 6-33.

Our staff would be pleased to discuss these items with you or your staff at your convenience. If you have any specific questions, please contact Mr. James Chen, Senior Traffic Engineer, at 590-6331.

Thank you for the opportunity to review this document.

JAMES T. POTT
DIRECTOR

for Wm. Doyle Bowers
Manager - Engineering

,uA~IB:J<?&js

cc: W. Calvin Hurst
Harbor Environmental Specialist
Port of Los Angeles

CC JNTY OF LOS ANGEL 3

ROADDEPARTMENT
lS40 ALCAZAR STREEr
LOS ANGELES. CALIFORNIA 90033
Telephone 226.8 11 l

ADD= AU CORRESPONDENCE To:
P.O. Box 4089
'LOS ANCUES. CALIFORNIA 9005 1

THOMAS A. TIDEMANSON. Road Coamh4-w
WYNN L. SMITH. Chief Dcpclcy

ENVIRONMENTAL ANALYSIS OFFICE
FILE COPY

RECEIVED JUN 24 1982 HARBOR DEPARTMENT

IN REPLY PLEASE REFER TO FILE: P-1 810.25.11

June 22, 1982

Mr. W. Calvin Hurst
Harbor Environmental Scientist
Port of Los Angeles
P. 0. Box 151
San Pedro, CA 90733

Dear Mr. Hurst:

DRAFT EIR INTERMODAL CONTAINER TRANSFER FACILITY

We have reviewed your draft EIR on the Intermodal Container Transfer Facility (ICTF) proposed to serve the Ports of Long Beach and Los Angeles. The main thrust of our evaluation is directed toward the transportation and circulation section. While the project has considerable merit, 'we are concerned about some of the cumulative impacts created by the proposed increased train traffic in the Wilmington Branch corridor and other planned facilities which impact east-west highway traffic movements in the area.

Rail-Surface Street Conflicts

As identified in the report, this Downtown to Harbor segment of railroad right of way involves from 31 to 34 at-grade crossings depending on rail routing configurations. The present screenline highway traffic volume across this right of way is in the range of 400,000 vehicles per day. The year 2000 scenario suggests that a seven fold increase in train movements can be expected along the involved Southern Pacific line. At the same time, the report suggests that this will only result in a two to three fold increase in highway flow downtime (blockage). Even if this claim is true, it will result in increased delays of 30 to 110 minutes daily to vehicular traffic at each grade crossing. Because the proposed fully loaded trains will be one mile in length and will be starting from a standing stop at either end, the two to three fold increase appears unrealistically low. Added to this concern is the impact of these long, slow moving trains backing highway traffic up through adjacent major intersections. Additionally, on the crossing arterials having a signal system, the trains' long preemption of these signals will disrupt the signal system progression and cause additional delays.

34

As indicated in the report, the LACTC is actively considering a Los Angeles to Long Beach Light Rail Line within the Wilmington Branch right of way. The possible random peak hour crossings of both types of service at any intersection within minutes of each other could result in four highway traffic interruptions within
35 a ten to twelve minute period. Such a conflict would create total havoc with the corresponding highway traffic. Accordingly, serious consideration must-be given to grade separation facilities when ICTF trains begin to operate during highway travel. peak hours.

In addition, the report dismisses the cumulative impact of the coal/dry bulk terminals that both Forts are proposing because
36 different rail corridors would be utilized. We believe that while the corridors are separated by varying distances, the combined projected train traffic will have a measurable impact on east-west highway traffic in the area. Therefore, the EIR should speak to the cumulative impact of the LRT, your intermodal container proposal, the coal train and current rail traffic on the UPRR, AT&SF and SPTC lines in the area as it affects the overall transportation in and crossing this corridor.

Funding Consideration

The report alludes to possible qualification of these crossings for the PUC grade separation funding process. Currently these PUC monies are only sufficient to fund 3 or 4 grade separation projects statewide each year and the prospects of building a significant number of crossings on the container route are remote. Accordingly, we believe other funding sources should be used to prevent what amounts to a new "special interest" need from competing with other
37 critically needed separation projects throughout the State for these limited funds.

Similarly, we understand that the light rail proposal does not necessarily need the same 'rigid vertical approach profile, with its corresponding higher cost, as the freight train trackage. Accordingly, unless a joint separation facility for both types of trains can be fully justified, *the* ICTF proposal should not look to the light rail financing for grade separation funding. Also, joint use of the grade separation must be planned for in the development of any LRT grade separation design to accommodate the heavier loads and gentler approach grades required for the freight trains. If this is the case, based on our experience, the cost of such facilities would be in the magnitude of $100$15 million at each location.

The proposed highway improvements directly related to the truck movements to and from the ICTF appear adequate to handle the associated impact. Assembly Bill 3375 which addresses overall port access and which would alter the State Highway System in the area has possible regional implications. Because of the regional significance and the County minimums issue, it may be desirable to pursue legislation that would provide "Off the Top" funding for the route improvements needed to serve this facility and the port area. 38

Very truly yours,

T. A. TIDEMANSON
Road Commissioner

CECIL E. BUGH
Assistant Chief l#eputy

DLR:mes/20A

ENVIRONMENTAL ANALSIS OFFICE

STATE OC CALlCORN~A-RCSOUQCES AGENCY

EDMUND G. BROWN JR. Govermor

CALiFORNlA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGlON
107 SOUTH RROAQWAI. SUITE rotf
LOS ANGELES, CALIFORNIA 90012-4596
(213) 620-4460

JUN 2 4 1982

Mr. James W. Burns
Assistant Secretary for Resources
Resources Agency, 13th Floor
Resources Building
Sacramento, California 95814

RE: Draft Environmental Impact Report for the Intermodal *Container* Transfer Facility, Dated June 1982. SCH #81100215

Gentlemen:

We have reviewed the subject document concerning the proposed construction of a rail yard for the transfer of marine-oriented containers. The project, jointly proposed by the Ports of Los Angeles and Long Beach, will be located on a 260-acre site near the northerly terminus of the Terminal Island Freeway.

The entire project site will be paved, and rain water runoff will be discharged into Dominguez Channel. The water quality of this discharge is expected to *be* typical of -pavement runoff. Oil and grease traps will be incorporated into the storm drains within the maintenance areas. Spill containment controls will be incorporated to prevent spills from reaching the channel.

We previously commented on the Notice of Preparation for the Draft Environmental Impact Report for this project on October 5, 1981 and October 22, 1981, expressing topics of concern to this Board. In general, the DEIR adequately addresses our concerns.

Inasmuch as this discharge might contain pollutants, an NPDES permit may be required. *When the project is* finalized, the Ports should provide the Board with sufficient information regarding the character of the discharge and proposed mitigation measures to allow us to make this determination. This information should be submitted at least six months prior to the commencement of the discharge. 39

If you have any questions, please call Dr. Lewis A. Schinazi or Taira Yoshimura of my staff at the above telephone number.

Very truly yours,

RAYMONDM. HER-'
Executive Officer

cc: State Clearinghouse, ATTN: Dorothy Feher
Port of Los Angeles, ATTN: W. Calvin Hurst, Harbor Environnental Scientist
Port of Long Beach, ATTN: Leland R. Hill, Director of pat Planning

LOS ANGELES COUNTY FLOOD CONTROL DISTRICT

☐ FLOOD PLAIN REPORT

☐ FLOOD HAZARD REPORT

RECEIVED JUN 23 PLANNING DIVISION

File No. 2-15-311 2-15-313 1-M1

Review of _____

Map or Transmittal Letter Date _____

TO: _____

_____ 1. This area is outside the boundaries of the Flood Control District and not under its jurisdiction.

_____ 2. The Flood Control District has no requirements for this subdivision/application.

_____ 3. The subdivision/site is reasonably free of flood hazard from major channels and streams, but may be subject to local flood hazard. Refer to the report of the City/County Engineer concerning local drainage.

_____ 4. Portions of the subdivision/site lying in and adjacent to ( ) steep hillsides, ( ) natural watercourses, ( ) _____ are subject to flood hazard because of ( ) overflow, ( ) erosion, ( ) mudflow and/or deposition of debris. Refer to the report of the City/County Engineer concerning local drainage requirements.

_____ 5. This project will not significantly affect the environment as far as the District's interests are concerned.

_____ 6. Place a note of flood hazard on the final map/grant of waiver and submit engineering documentation to support those limits.

_____ 7. Prior to recordation of the final map/grant of waiver, adequate engineering documentation must be submitted showing that building sites are available and are free of flood hazard.

_____ 8. Provide a drainage concept prior to approval of the tentative map. Sufficient information must be submitted to the District showing the extent of the drainage problem and proposed solution.

X 9. Provide improvements to eliminate the flood hazard. Improvements may include ( ) storm drains and/or channels, ( ) debris control facilities, ( ) vehicular access to structures, ( ) _____.

_____ 10. Dedicate fee title/an easement/future easement to the District/County of L.A./City of _____ providing adequate right of way for _____.

X 11. Show on the final map the Flood Control District's right of way for _____. A permit will be required for any construction affecting the District's right of way.

_____ 12. Approval of the _____ is recommended subject to any conditions noted herein or shown on returned map.

_____ 13. The recordation of this map will not unreasonably interfere with the free and complete exercise of the easement held by the District.

_____ 14. The _____ is unsatisfactory. Note the reasons stated herein or shown on returned map.

Comments:

40

Information relative to the above comments may be obtained by contacting:

Engineering Investigator _____

Telephone (213) 226-4324

Approved by W. T. Linick C 13878 Date of Report 6-28-82

1738 PCD 6/81

FORM GEN 160 (REV. 2-79)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

CWP 82-601
223rd & Alameda Sts.

Date: July 1, 1982

To: W. Calvin Hurst, Harbor Environmental Scientist, Port of Los Angeles

From: T. K. Prime, Transportation Engineer, Department of Transportation

Subject: DEIR FOR THE INTERMODAL CONTAINER TRANSFER FACILITY

The DEIR adequately quantifies the impacts of project-generated traffic on the local street system but incorrectly concludes that the project will have "little or no impact" (pg. 3-109). Based on the ICU values, both for the null and SCAG highway improvement conditions, the project will have a significant impact on the environment with respect to traffic. 41

The attached comments were prepared by our design sections based on the drawings cited and represent the Department's position as to the adequacy of access to the project.

WFC:jv

cc: Joe Crowley

Attachment

ATTACHMENT

INTERMODAL CONTAINER TRANSFER FACILITY

Comments by Design Sections, Department of Transportation

1. Sheet 2-5. Appears that it would be desirable to increase the length of the Alameda Street southbound left-turn lane to the 405 Freeway northbound on-ramp.

2. Sheet 2-6. Revise alignment of new ramp (223rd Street) approach to Alameda Street to more nearly approximate an angle of 90 degrees. (This is north portion of ICTF project; therefore, a heavy container truck movement from westbound to southbound could be anticipated.)

42

The existing eastbound 105 connection to Alameda is a right turn. This will become a left turn off 223rd Street.

In general , more painted medians and less concrete would be desirable even though maintenance of the paint would be a problem.

3. Sheet 3-4. Southbound right-turn exit - eastbound to northbound entrance and the southbound left-turn exit should be redesigned to create a single (large) intersection controlled by one two-phase traffic signat, which would include pedestrian phasing (Sheets 3-4 - no pedestrian considerations). This could combine 3 separate intersections (length of approximately 400 feet) to one intersection having a length of approximately 200 feet.

A westbound triple free-flow right-turn lane which immediately expands to four lanes is totally unnecessary. This triple right turn could result in potential conflicts and undesirable entrapment. Besides, this right turn would possess a capacity greater than Sepulveda Boulevard (including both directions).

At Terminal Island freeway and Sepulveda, the geometries, signal hardware and operations appear unsatisfactory. Looking at 1978 aerial photo, this segment of the Terminal Island Freeway does not appear.

At 223rd Street, 405 Freeway and Alameda, so much effort is made to separate railroad and vehicular traffic (because of physical reasons) it would appear highly desirable to grade separate the railroad track at Sepulveda Boulevard and provide direct access between ICTF and the Terminal Island Freeway entering under Sepulveda Boulevard.

Also, Sepulveda Boulevard, being a major highway, three through traffic lanes should be provided and dedication should be acquired for such an improvement in the future. It may be neccessary to widen the Sepulveda Boulevard bridge over the Dominguez Channel from 4 to 6 lanes.

4. Sheet 3-5. The westbound double right turn to the ICTF employee's entrance is unnecessary. The outbound right lane should be the beginning of westbound right turn lane for main container terminal entrance or a third lane for through traffic (beginning west of the employee's entrance).

Without a recessed left-turn pocket, the eastbound left turn to the employee's entrance has to be prohibited.

The width of employee's entrance may be a little excessive (no signal control indicated or should be recommended). This entrance could become an aggravating problem.

See no need for roadway reduction striping west of railroad tracks.

Do not agree with signal phasing at Sepulveda Boulevard and Terminal Island Freeway. East-west left turns should be simultaneous on lead-lag. Phasing shown provides for an eastbound left turn but no phase to get out of the north leg. Also, no pedestrian phasing.

Question need for pork-chop island, southwest quadrant and double eastbound right turn.

5. Sheet 3-6. Object to all of the overhead signing "On Left Arrow Only," double left-turn arrows, etc. Signing should conform to design standards and practices of the City of Los Angeles Department of Transportation. *

6. Sheet 3-7. Same comments as Sheet 3-6.

DEPARTMENT OF PLANNING & BUILDING
333 WEST OCEAN BLVD. l LONG BEACH, CALIFORNIA 90802
(213)590-6651

July 9, 1982

Mr. James McJunkin
Executive Director
Long Beach Harbor Dept.
925 Harbor Plaza
Long Beach, CA 90802

Dear Mr. McJunkin:

On July 8, 1982, the Long Beach City Planning Commission reviewed the Draft Environmental Impact Report for the Intermodal Container Transfer Facility. This review was undertaken by the Commission in its role as responsible agency for the project.

Attached are the comments of the Commission on the EIR. You will note that the Commission supports the project, but has four primary concerns relative to the impact of the project on the City of Long Beach: transportation, safety, noise and air quality. In each of these. areas the Commission has recommendedspecific amendments to the EIR, particularly with respect to new or strengthened mitigation measures.

I will be pleased to discuss this matter further with you or your staff, and to make a presentation before the Harbor Commission as may be appropriate.

Sincerely yours.;

Robert Paternoster
Director of Planning and Building

RP/kmf

Att.

RECEIVED
LONG BEACH HARBOR DEPT
1982 JUL 10 PM 4 08

Review of the Draft Environmental Impact Report for the Intermodal Container Transfer Facility

Importance of the Project

The City Planning Commission finds that the proposed Intermodal Container Transfer Facility (ICTF) is an important project to the region which will have many economic benefits for the Ports of Long Beach and Los Angeles, and for the cities of the Los Angeles Basin. The Planning Commission, therefore, is supportive of the proposed project. It further finds that the Draft EIR completely and accurately presents the potential environmental impacts of the subject project with a few exceptions as noted below.

Transportation Impacts

The proposed ICTF will have serious transportation impacts upon the City of Long Beach. Because the proposed facility is to be located in an area within which the extension of Route 47 is proposed in the Transportation Element of the General Plan, construction of the facility preempts this needed roadway extension. As part of the studies leading to the ICTF proposal, the Southern California Association of Governments developed an alternative highway plan to the Route 47 extension which would involve an upgrading of the Alameda Street corridor and extension of State responsibility on the Long Beach Freeway southward to Ocean Boulevard at the Gerald Desmond Bridge. The City of Long Beach has reviewed the proposed alternative and finds it acceptable. However, before the ICTF can proceed, the Transportation Element of the General Plan must be amended to eliminate reference to the extension of Route 47, and to substitute the proposed alternative. The City is not prepared to make such an amendment until implementation of the alternative roadway system is assured.

43 Recommendation: The City Planning Commission recommends that a mitigation measure be added to the EIR which will specify that construction shall not proceed on ICTF until the California Department of Transportation has accepted the alternative routing for Route 47 extension and has initiated the necessary legislative and budgetary steps to insure its implementation.

The City Planning Commission is also concerned that ICTF will increase truck traffic on City streets adjacent to residential areas. Specifically, if steps are not taken to discourage such movement, trucks originating or destined for the Long Beach Harbor might utilize a route including the Long Beach Freeway and Willow Street to connect with ICTF. The preferred route would be to utilize Long Beach Freeway, Anaheim Street

and Route 47 to connect with ICTF. The preferred route will be utilized by truckers if it is an easier route of travel, and if they are so routed by the operating agencies.

Recommendation: The City Planning Commission recommends that a mitigation measure be added to the EIR which would require that the access to Route 47 northbound from Anaheim Street westbound ("I" Street) be improved as part of the ICTF project, and that a mandatory routing be established for trucks between Long Beach Harbor and ICTF utilizing Long Beach Freeway, Anaheim Street and Route 47. 44

Safety Impacts

The City Planning Commission is concerned that appropriate measures be taken to protect the safety of adjacent residents in case of a catastrophe at ICTF. In reviewing the section on safety in the EIR, the Commission notes a complete lack of discussion of radioactive materials. 45

Recommendation: The City Planning Commission recommends that the EIR be supplemented to include a discussion of the potential hazard of the storage and transfer of radioactive material at ICTF, including mitigation measures as appropriate to insure the safety of Long Beach residents.

The City Planning Commission notes that a full listing of potentially hazardous materials which will be handled by ICTF is not included in the EIR. Although the EIR recommends as a mitigation measure that containers with hazardous materials be stored in a special area in the northwest corner of the site, there is an incomplete analysis of the impact that an accident regarding these containers would have upon residential areas to the east. 46

Recommendation: The City Planning Commission recommends that the EIR be supplemented to include a full discussion of potentially hazardous materials to be handled at ICTF, and to include a risk assessment therefore.

Noise Impacts

The City Planning Commission notes that the EIR predicts "potentially significant" noise impacts during the construction period upon adjacent residential areas within the City. Although a mitigation measure refers to the possible limitation of late night or early morning construction activities, a specific control of the construction time schedule is not mandated.

47 Recommendation: The City Planning Commission recommends that a mitigation measure be added to the EIR which would limit construction activity to the hours of 7:30 a.m. to 6:00 p.m. Furthermore, the Commission recommends that a mitigation measure be added to the EIR which would require that the sound attenuation walls be constructed before any other major construction activity begins on the site.

The City Planning Commission also notes that the EIR projects significant noise impacts on residential areas due to the operation of ICTF. In response thereto, several mitigations are listed which may bring the operation into compliance with the City of Long Beach Noise Control Ordinance. There is no indication which mitigation measures are to be implemented, and there are no assurances that their implementation will bring the facility into compliance with the Noise Ordinance.

48 Recommendation: The City Planning Commission recommends that the EIR be amended to include a mitigation measure which would require noise measurements to be taken in affected neighborhoods during the first three months of full operation of the facility: furthermore, that if such measurements exceed the standards of the Long Beach Noise Control Ordinance, steps will be taken immediately to bring operation of the facility into compliance (alteration of operating procedures and/or construction of additional walls and/or other noise attenuation devices).

49 Recommendation: The City Planning Commission recommends that the EIR be amended to make the mitigation measures regarding noise more specific and more mandatory. For instance, it should be mandated that bridge crane specifications require enclosure of the diesel/electric power plant and the use of resident&al class silencers on the diesel engine exhaust and intake systems.

Analysis of vibration is included in the section of the EIR regarding noise. The City Planning Commission finds that the analysis lacks quantification of the potential impact and the extent to which the proposed mitigation measures will **reduce that** impact.

50 Recommendation: The City Planning Commission recommends that the EIR be supplemented to specifically quantify the expected vibration impacts and identify the extent to which these impacts will be reduced by the proposed mitigation measures.

Air Quality Impacts

The project will cause a significant amount of air pollutant emissions. The impact of these emissions on the regional airshed is adequately covered in the Draft EIR. However, the impacts to local air quality are not adequately reviewed. The Planning Commission is concerned that appropriate measures be taken to prevent further degradation of Long Beach Air Quality.

Recommendation: The City Planning Commission recommends that the EIR be supplemented to include a detailed evaluation of the impacts to Long Beach air quality and that mandatory mitigation measures be included to insure that local air quality is not degredated beyond the current level. 51

Frs. Joanne ::iilliams
Xndward Village
Eoneowners Org.
3595 Santa Fe Ave. Sp. 45
Long Eeach, Ca. gG810 -

City of Long Beach
Dept. of Planning & Building
333 W. Ocean Blvd.
Long Beach, Ca. 90802

Gentlemen:

In answer to your letter of July 1, 1982, I could find no verification for your already stated decision to accept the EIR draft on the Intermodal Container Transfer Facility. There are many omissions in this draft and many areas are not covered.

How many years will this yard have to be in operation before even a partial savings per container is realized? 52

I ask you to address the problems of vehicular traffic increase not included in the draft. The commercial project at the 7 and 405 interchange. This is not included. With the projected 600,OO containers per year this means approximately 1,644 containers per day. Since these containers must be removed and returned then 1 diesel truck must enter then leave the yard for each container, This means 3,288 diesel trucks per day. 53

You say the AQMD will govern the rail emissions. Where is the clearance for engines numbered 730, 2506 and 2508. These are just three of the engines that sit next to our wall and within 30 seconds we are choking on the fumes. Who will regulate the speed? HOW will you stop noise? The ICTF will increase these problems. It can not *make* it better for us. You are not solving a pollution problem with this facility, you are only moving it from one area to another and in I reality you are increasing the pollution. 54 55

There has been 1 vibration test made and it was on a short regular freight traveling at a slow speed. There has been no testing on a loaded coal train traveling at 20 miles hour. How can you say more will be less. You are increasing the vibration not lessening it. 56

I would also like to refer you to pages, 3-65, 3-67, 3-68 and 3-70. All of these refer to the chemical, containers and the manner in which they will be handles and stored. Some of these will be -heat sensitive chemicals but they will be stored on asphalt paving. Asphalt paving will increase the temperature by 25 to 45 degrees. The section selected for the storage of these chemical holding containers will be approximately 1,500 feet. from the 405 freeway. An exploding or leaking container during any of the peak travel hours would create some major problems that have not been considered. 56

::one of us can accept your statement that the instalation of this facility will make our lives better. The staff's review failed look at the results of the sound testing made by the Harbor depart ment. I have enclosed a copy of this for your information. The figures Cited in the EIR draft were not those on this test Where l
58 they obtained their information is unknown to me, and is far below those shown on this test.

Who of you has made an honest apprasial of the problems we have? Who of you has come eves and stood by when a loaded coal train casse at 20 miles an hour plus? Who of YOU has felt the vibration? How
59 many *of* you are aware of the derailments?

To tell us that more till be better is like telling the residents, at the end of the runway that 30 jets a day will be better than 3, or that 2 broken legs is better than 1. This facility will not improve the quality of life in the city of Long Beach

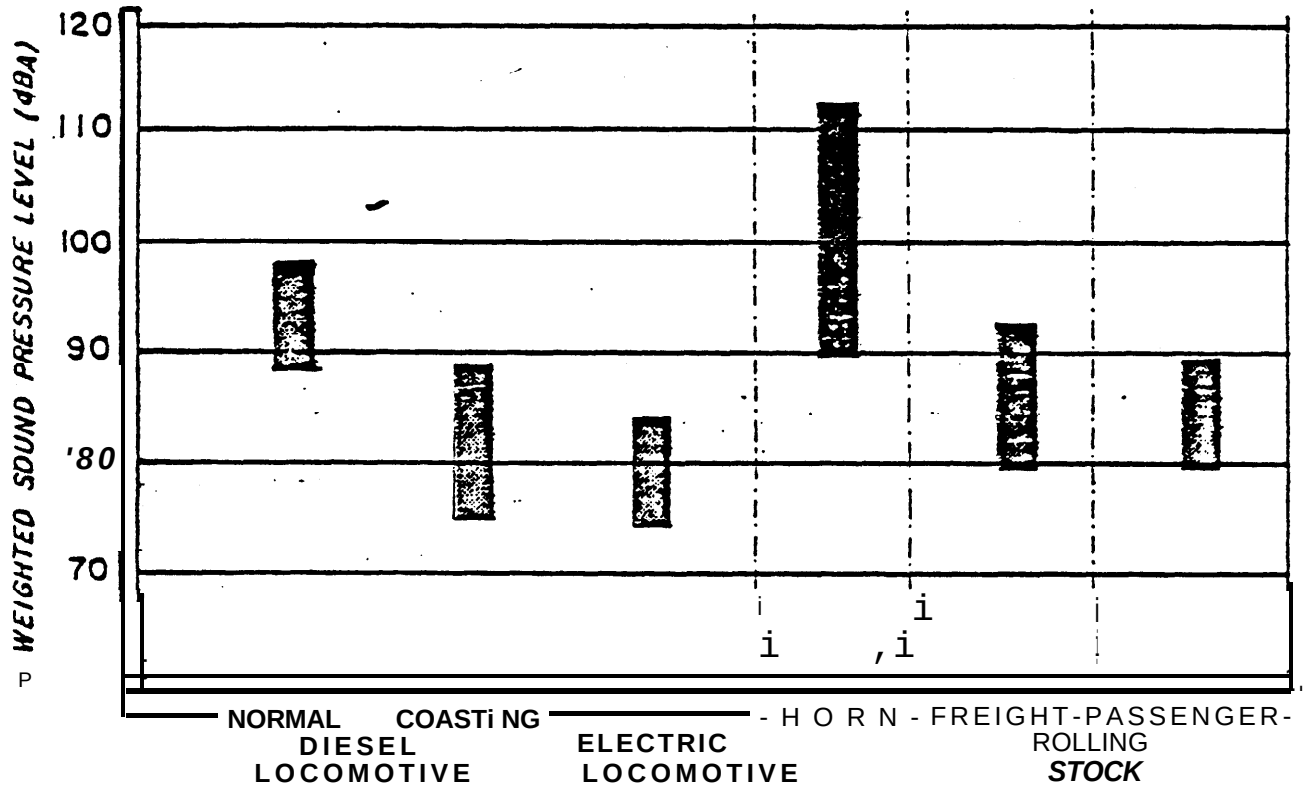
I spent much time reading the EIR draft on this facility and it seems that many of the findings are glossed over or simply sot stated. This will be a railroad yard nothing more. It will have
60 the same problems as all rail yards. Dirt, vandalism ail the negative aspects with any other facility. You will not have some beautiful area. The increase in crime will tax the police even more. Crime increase is always a problem with this type of yard.

I ask you to really look at this. Come out and see what problems you will be having. Take off your rose colored glasses and see it for what it really will be. A dangerous facility with chemicals sitting around that could e-lode. An increase' in the crime in the area and the smog that will choke and blind you.

Thank you,

Mrs. Joanne Williams, Pres.
Windward Village Homeowners
Org.

RALROAO EQUIPMENT NOISE



NOISE EXPOSURE LEVELS IN dBA FOR TRAIN OPERATION AT 20-30 MPH AND PASSING AT A DISTANCE OF 50 FEET.

SOURCE : ENVIRONMENTAL PROTECTION AGENCY REPORT PB 208-660

FIGURE 7

State d C&rnia

Businc; Transportation and Housing Agency

M e m o r a n d u m

To : ANN BARKLEY, Division Chief - DOTP
Department A-95 Coordinator
1120 N Street
Sacramento, California 95814

Attention: Darrell Husum

Date: July 13, 1982

File : A-95 REVIEW

From : K.D.STEELE- District 07
DEPARTMRNT OF TRANSPORTATlON

Subject: Project Review Comments

SCH NUMBER

8ll00215

Proposed: Intermodal Container Transfer Facility(I.C.T.F.) L. A. CA.

We have received and reviewed the Draft EIR on the above project and have the following comments:

Environmental

Document location	Comments
Page l-8, Paragraph I. Page 3-10, Table 7 Page 3-13, Table 9	In each of the three document locations, the yearly operation emissions are based on a 365 day year. However, since the ICTF will *operate* a 2 shift 5 day week, this is a 260 day year 61
Page 3-25	The statement that most of the wildlife currently living on the project site would move off the site to other locations 'if the; project is built is inaccurate. The size of wildlife population is dependent on the quantity and quality of its habitat. At any given time, each habitat usually has a wildlife population close to Its carrying capacity. When wildlife is displaced from a project site the carrying capacity of nearby sites is exceeded, intensified competition results and mortality occurs until the wildlife populations on the remaining sites are again in balance with the constraints of the habitats. The conclusion in question should be that an insignificant wildlife population loss will occur. 6 2

63	General reference	With respect to the employees of the project, provisions for alternatives to single-occupant automobiles should be encouraged, Also, possible strategies for encouraging the use of buses, carpool., vanpools or other transit services should be incorporated into your study and/or identified as mitigation measures to reduce traffic impacts.
	General reference	After environmental clearance is obtained, construction and permit issuance regarding the San Diego Fwy. and the Terminal Island Fwy. will. be needed where appropriate.

The Environmental Planning contact person is Mr. Bill Adams and his telephone number is 620-4364.

Project Development and Traffic Operations

	Document location	Comments
64	Page l-24, Figure 15	The reference to the Terminal Island Fwy. in the main part of this figure should be changed to POLA Property.

In addition to the Draft EIR, the ICTF Plans by SCOTT/DMJM dated March 15, 1982 were reviewed by Project Development and the comments are as follows:

	Drawing #	comments
	2-2 RR Profile	Vertical Clearance scales 229. Suggest 23' as stated in Planning Manual Section 7-309.5
65	2-5 Plan	Existing Alameda width is 84'. The curb to curb proposed scale is p[illegible]. Why?
	2-6 Plan	Proposed Ramp to 223rd St. has compound horizontal curves. Why?
	2-8 Alameda Profile	Office of Structures should review this profile. LA-405 footing may be affected.
	2-9 Profile	Proposed Ramp to 223rd St. sight distance is extremely poor. It doe: not meet State Standards.

3-1 to 3-12	The Terminal Island Fwy. terminus is shown at two locations. Is the freeway going to be split? Clarify.	66

The Project Development "D" contact person is Mr. Barry Rabbit and his telephone number is 620-4599.

Transportation Planning

Document location	Comments	
Page l-4	The report states that freight movements will be via the San Pedro Branch and the Wilmington Branch. The discussion should include the expressed local, regional and state need for public transit (passenger service) on the Wilmington Line. What provisions can be made to accommodate this public need?	67
Page 3-l, Last paragraph and Page 3-80, Paragraph 2	Does design and layout preclude the Union Pacific Railroad from utilizing the ICTF? The Union Pacific could gain entry from the south and there could be a reduction of trucking to the Vernon yard, unless the ICTF would be fully utilized by the Southern Pacific Railroad.	68
Page 3-16, Last paragraph	Add to the last paragraph the phrase "and public transit use .	69

The Transportation Planning contact person is Mr. Bob Kabel and his. telephone number is 620-3090.

We look forward to the opportunity to review the Final E.I.R.

K. D. STEELE, Chief
Environmental Planning Branch
Transportatfon District w
Clearinghouse Coordinator
Far infarmatfon, contact Darrell Wood
(ATSS) 640-2246 QF (213) &o-2246

Attachment

RECEIVED
JUL 2 0 1982
State Clearinghouse

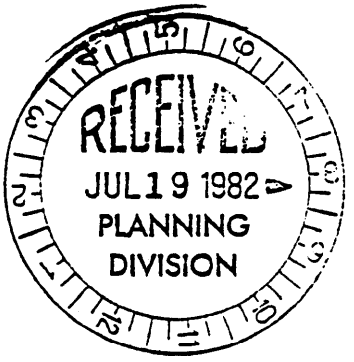
Southern California Edison Company

lOOLONG GEACH GOULEVARO
P.O. aox 410
LONG 8EACH. CALICORNIA OOSOl

ROBERT L. JENSEN
EXECUTIVE ASSISTANT

TELEPHONE
(213)435-1121

July 14, 1982



Mr. Leland Hill
Director of Port Planning
Port of Long Beach
925 Harbor Plaza
Long Beach, CA 90801

Dear Mr. Hill:

SUBJECT: Port of Long Beach/Port of Los Angeles
Draft Environmental Impact Report
Intermodal Container Transfer Facility
Review

The Southern California Edison company has, as a result of your transmittal of June, 1982, had an opportunity to review the subject environmental impact report and would like to offer the following comments concerning its contents.

Sections 1.1 (p.l-1), 1.3.1.2 (p.l-8), 1.3.1.3 (p.1-l1), 1.3.2.2 (p.l-31) and 2.1.1 (p.2-5)

These sections refer to the leasing of 40 acres of Edison property [Long Beach-Hinson Transmission Line right of way south of Hinson Substation) for remote storage during. Phase II. Section 1.3.1.2 states that "storage of movable cargo such as containers-on-chasis is a permitted use under power transmission lines."

As stated in Edison's letter to the Port of Los Angeles, dated October 13, 1982, Edison will consider this use under 66kV Transmission Lines "subject to" protective conditions but will not permit such use under our 220kV Transmission Lines.

7 0

Any possible rights granted for this use will be in the form of a terminable and non-transferable license. This is necessary to ensure the "recapture", on short notice, the property or portions thereof, when needed for expansion, rearrangement, maintenance or protection of

Edison's operating facilities. Protective conditions to be considered will include, but not be limited to, minimum clearances from Edison's facilities, maintenance of **access** roads, tower protection and storage of flammable or explosive materials on the property will not be permitted. Mainteannce activities involving welding, **painting,** os sandblasting will not be permitted.

These sections also refer to the leasing of approximately 10 **acres** of Edison property **(north** of **Hinson Substation) under Phase III.** As previously stated in our October 13th letter, **Edison cannot** commit to holding this property for future use.

Section 1.3.2.1.1 (p.l-15)

This section references relocation of Edison's 16 inch fuel oil line (within the Southern Pacific right of way) in connection with the Alameda Street grade separation for the rail access crossing.

71 Edison will not accept responsibility for the relocation cost for this pipeline and suitable replacement right of way must be provided. In addition, pipeline construction standards require that any changes in direction be made with a minimum bend radius of 200 feet to prevent **movement** of the **line.** This requirement should be incorporated into your final design for the utility corridor.

Section 2.2.1 (p.2-8)

Statements made in this section regarding termination and **expiration** of Edison's licenses should be clarified as follows:

72 It is the intent of Edison to periodically renew these licenses until a firm commitment for use of the property is obtained from the Port Authorities and suitable agreements have been reached concerning the terms and conditions of the use. Also, it is the policy of the Edison Company to not terminate **a** license prior to the expiration date unless there is a cause for the termination such **as** failure by the tenant to abide by the terms and conditions of the license or the need for use of the property by the Edison Company for public utility purposes.

Section 3.7.5.2.4 (p.3-79)

The Ports will be responsible for any relocation assistance or payments to which our displaced tenants may be entitled. 7 3

In closing, please be assured that we stand ready to work with you in an effort to answer any questions *or* concerns you may have concerning this project.

Sincerely,

RLJ:pcr

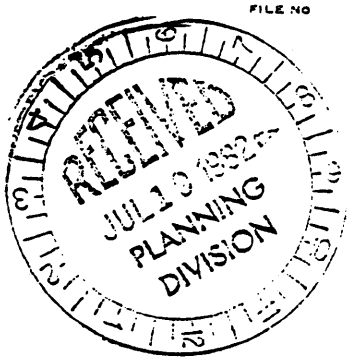
ADDRESS ALL COMMUNICATIONS
TO THE COMMISSION
CALIFORNIA STATE BUILDING
SAN FRANCISCO, CALIFORNIA 94102
TELEPHONE (415) 557-3674
W.R. Schulte

Public Utilities Commission

STATE OF CALIFORNIA

July 15, 1982

FILE NO



Leland R. Hill
Director of Port Planning
Port of Long Beach
Long Beach Harbor Department Building
925 Harbor Plaza
Long Beach, CA 90802

Dear Mr. Hill:

This refers to the Draft Environmental Impact Report for the proposed Intermodal Container Transfer Facility prepared by the Harbor Departments of Long Beach and Los Angeles. We are responding as a responsible agency for the proposed railroad-highway grade separations at Alameda St., Interstate Hwy 405, 223rd St. and 223rd St. ramp and the proposed grade crossing at Sepulveda Blvd., and as the state agency responsible for rail-highway grade crossing safety.

The staff has no comment on the proposed separations of the Southern Pacific Transportation Company at the rail entrance to the property. As pointed out in the Draft EIR construction authority will be required for each of the four crossings. Application requirements for such a project are set forth in Rule 38 of the Commission's Rules of Practice and Procedure (Title 20 of the California Administrative Code). All four separations should be included in one application.

We do have some concerns with regard to the proposed grade crossing of the Southern Pacific together with the existing Union Pacific track near the truck entrance at Sepulveda Blvd. The staff would suggest that cantilever lights be used in addition to the flashing lights with automatic gates mentioned in the draft on both approaches, and that care be taken in signal location to provide adequate sight distance, especially for north bound vehicles turning left out of the Port of Los Angeles property marked "Terminal Island Freeway" on Figure 15, page 1-24. 74

Our real concern is with the discussion in Section 3.8-Transportation and Circulation, relative to the rail impacts and traffic impacts resulting from increased rail activity. The Commission has no permit authority over the additional trains, however, we are the agency responsible for grade crossing safety and we agree with the report that the incremental increase will have potential adverse impacts in traffic delay at at grade crossings and accidents, both train involved and non-train involved. Unfortunately, the draft places the Commission, as a reviewer, in a slightly awkward position. The report is premature in the sense that the magnitude of the impacts are not explicitly discussed nor are there positive statements or specifics relative to migitation. In the report a traffic study (Table 30) identifies a list of grade crossings for further vehicular traffic delay study but does not address several material issues including future study parameters, accident potential, alternative improvements, cost or financial responsibility. There are, in the report, general references to predictors, warning device improvements and grade separations, but without specific proposals no adequate review can be effected. 75

On the bottom of page 3-80 the draft contends that "Improved crossing protection or grade separation construction at grade crossings as recommended by the PUC would reduce the rail associated impacts." The Commission staff would welcome the opportunity to participate in an evaluation of the proposed rail lines, but does feel that the entities with financial responsibility, mainly the railroad and local agencies, should also be involved.

The Grade Separation Priority List developed by this Commission is a permissive list and constitutes funding for only approximately one-half of the grade separations constructed each year. The list is the result of local and Caltrans initiated nominations and is not necessarily exhaustive. The Commission assesses 90 per cent of the cost of a grade separation to eliminate an existing grade crossing to the moving party, usually the local agency, and 10 per cent to the other party, usually railroad. The Grade Separation Fund contributes 80 per cent to those few projects high enough to qualify.

The crossing improvement list is developed strictly for the allocation of Federal Funds provided from the various Highway Safety Acts. Unfortunately it appears that Federal Funds will no longer be specifically earmarked for crossing projects. For projects that do not include Federal Funds, the cost of protection installation is usually divided equally between local agency and railroad.

The Commission certainly appreciates that this project will only contribute incrementally to the rail related issues already existing and we do not want to burden this worthwhile project with undue costs, however, we do feel it necessary to quantitatively determine or at least narrow the potentially significant impacts and develop a list of positive mitigating steps. We will certainly participate in or direct an evaluation of the affected grade crossings and coordinate disposition of the proposed improvements including resolution of financial responsibility.

Very truly yours,

W. L. Oliver

W.L. OLIVER, Principal
Railroad Operations & Safety Branch
Transportation Division

cc: Debbie Fudge
State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

ENVIRONMENTAL ANALYSIS OFFICE
FILE COPY

CITY OF LOS ANGELES
CALIFORNIA

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CITY ENGINEER
ROOM 800, CITY HALL
LOS ANGELES, CA 90012

DATE JUL 19 1982

Mr. W. Calvin Hurst
Harbor Environmental Scientist
Port of Los Angeles
425 S. Palos Verdes Street
San Pedro, CA 90731

Intermodal Container
Transfer Facility (ICTF)
Draft Environmental
Impact Report

CITY OF LOS ANGELES
RECEIVED
JUL 22 1982
ENVIRONMENTAL ANALYSIS
HARBOR DEPARTMENT

Dear Mr. Hurst:

Your letter dated May 26, 1982 requested comments on the Draft Environmental Impact Report (DEIR) for the ICTF. The document has been reviewed and the following comments are submitted to assist you in preparing the Final Environmental Impact Report.

1. We are concerned about the impacts that may occur as a result of decisions to reduce roadway capacities, eliminate emergency on-street parking and not provide pedestrian facilities as part of the current project. These concerns are defined in greater detail in my letter to your Department dated June 18, 1982. 76

2. In Section 3.11.1.6, the DEIR states that an existing 33-inch storm drain in Sepulveda Boulevard has sufficient capacity to service the entrance/parking/administration/customs area. Evidence in support of this statement should be made available; the maps in the DEIR indicate an area greater than can normally be drained by a 33-inch storm drain. 77

Sincerely,

PHIL KING
Acting City Engineer

By
B. W. Riley
B. W. RILEY
Division Engineer
Coordinating Division

BWR/MMR:vg

cc: Joseph M. Russell, District Engineer
Harbor District

MACMILLAN Ring-Free OIL CO., INC.
2365 E. SEPULVEDA BLVD., CARSON, CALIFORNIA 90745
MAILING ADDRESS: P. O. BOX 9157, LONG BEACH, CALIFORNIA 90810

July 20, 1982

Mr. James H. Mc Junkin
Executive Director
Port of Long Beach
925 Harbor Plaza
Long Beach, California 90802

Dear Mr. Mc Junkin:

Macmillan Ring-Free Oil Co., Inc. submits herewith comments on the adequacy of the Draft Environmental Impact Report (EIR) for the Intermodal Container Transfer Facility (ICTF) jointly prepared by the Los Angeles Harbor Department and the Long Beach Harbor Department. Our comments consist of this cover letter, the attached comments prepared under contract to Macmillan by Bright and Associates, an environmental, coastal management and regulatory research and analysis corporation, and the attached copy of oral testimony given at the Public Hearing on the proposed project conducted on June 21, 1982. In addition to the review by our staff and our consultants, the comments on the Draft EIR reflect concerns of our legal counsel, Ball, Hunt, Hart, Brown and Baerwitz.

As you will determine from the comments, the Draft EIR is inadequate because it does not contain all the relevant information needed to understand the project, and in turn, it is not possible to determine the extent of the related environmental impacts nor the feasibility of the suggested mitigations.

Among the key deficiencies in the Draft EIR is the failure to evaluate the impacts of the proposed project on both the ongoing short-term and the long-term plans of Macmillan. To date, we have not been contacted directly by representatives of either the Port of Los Angeles or the Port of Long Beach to consider the substantial impacts on our present and planned activities. Macmillan has been developing the site at 2365 East Sepulveda Boulevard for the past eleven years. During that time all necessary discretionary approvals, including that of the South Coast Air Quality Management District, have been obtained to construct a refinery complex. The master plan for the refinery complex includes a number of phased developments. To date, we have completed several storage tanks, petroleum product handling and dispensing phases, and we are continuing to add to the existing facilities as fast as time and resources permit. For example, we just recently completed the necessary changes to our facilities to handle alcohol.

Unless the proposed project is reoriented, we will not be able to complete the portions of our refinery planned for the eastern end of our present site. Without such adjustments such as arranging the ICTF facilities so that the 15 acres of Macmillan property is not required, you will preclude our ability to complete a project which has been planned for over eleven years, and for which various phases already have been completed. Further, the Draft EIR must include substantial additional review and analysis with respect to alternatives for the proposed project and with respect to the economic impacts on Macmillan's present and already approved plans.

We urge you to have the Draft EIR rewritten and recirculated for effective review in accordance with the requirements of the State of California and City of Los Angeles CEQA Guidelines.

Very truly yours,

Jerry M. Engelhardt

Jerry M. Engelhardt
Vice President and General Manager

JME/mmc

Attachments

RECEIVED
LONG BEACH HARBOR DEPT
1982 JUL 21 PM 1 06

BRIGHT & ASSOCIATES

1200 N. Jefferson, Unit B
Anaheim, California 92807
(714) 632-8521

July 12, 1982

Mr. Robert C. Wilson
Vice President
Macmillan Ring-Free Oil Co., Inc.
P.O. Box 9157
Long Beach, CA 90810

Subject: Review of Draft Environmental Impact Report for the Intermodal Container Transfer Facility (ICTF)

Dear Mr. Wilson:

Pursuant to your request we have reviewed the Draft Environmental Impact Report (EIR) on the Intermodal Container Transfer Facility (ICTF) jointly prepared by the Los Angeles Harbor Department and the Long Beach Harbor Department. Our review has not been exhaustive, rather, the information which follows only is illustrative of the many portions of the document which are inadequate. The determination that the document is inadequate is based on the following:

- Absence of adequate or complete data in many sections of the document so that a meaningful analysis of the extent and character of potential impacts is not possible, such as, for transportation and circulation (both rail and vehicular), handling of hazardous materials, general safety, extent and character of construction impacts, local air quality impacts, impacts on adjacent residential area, etc.
- Omission of detailed discussion on several essential aspects of the project which are known to produce significant impacts, e.g., ground shaking, noise, etc.

78

- Failure to discuss key aspects of the proposed project with adjacent private owners/operators of industrial/commercial property to be obtained as part of the project site and also with all local jurisdictions which will issue ministerial and and discretionary approvals for the project, such as the City of Carson for accomplishing the grade separation on Alameda Street. 79

- Failure to fully identify related projects in the vicinity of the proposed project which will have additive or cumulative impact significance, e.g., large export coal terminal project planned for the Port of Long Beach which will use Union Pacific trackage immediately adjacent to the proposed project site. 80

- Failure to include information required by the State CEQA Guidelines and the City of Los Angeles Guidelines, such as absence of discussion in the EIR of impacts listed in the Initial Study, e.g., "Risk of Upset". 81

- Failure to indicate that mitigations for project impacts are required as part of the project, i.e., mitigations listed throughout the document are not definitive, and often listed as "maybe", "could be", "if needed", "should be", etc. Certain mitigations also are listed as if they can be implemented immediately, yet our follow up discussions with concerned agencies, such as the City of Los Angeles Fire Department, indicate that there are no funds available for accomplishing said mitigations. Accordingly, because of the absence of definitive mitigations in the EIR, it is not possible to determine if the project impacts will be adequately mitigated as needed and, in turn, to what extent there will be unavoidable adverse impacts. 82

- Failure to focus on alternatives capable of eliminating any significant adverse environmental effects per CEQA requirement. 83

- Failure to adequately address long-term implications of implementing the proposed project as required by CEQA, e.g., loss of present and other future land use options. 84

Considering the above, the EIR must be revised, additional data and/or adequate data provided in order that the information in the EIR is sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public.

REVIEW OF CERTAIN SECTIONS OF THE DRAFT EIR:

The following general analysis, based on the sections in the Draft EIR, is not exhaustive, i.e., we have not conducted a very detailed analysis of all the information provided in each of the sections of the EIR.

Section 3.1, Air Quality:

The discussion on air quality is inadequate because:

- It does not include any information on the ambient air quality at the project site and the adjacent area. The data in Table 3, page 3-3 and Table A-11, page 6-21 should be modified to include such data so that it will be possible to determine the significance of project related air emissions on the immediate area adjacent to the project site. 85
- There are inadequate data to make a complete determination of the SCAQMD requirements which could apply to the project under the New Source Review process. Also, the horsepower of the various motors for the bridge crane and yard hostler are not provided so that it is not possible to determine whether a permit to construct and operate under present SCAQMD rules would be required. 86

87 • The cumulative impacts on the adjacent residential areas are not addressed in the EIR, i.e., the extent of such air pollution resulting from the addition to ambient levels of truck emissions, rail emissions, other equipment and construction emissions.

88 • The EIR does not clearly discuss or evaluate the inverse relationship between truck emission reduction, as a result of moving the railroad terminal closer to the ports, and rail emission increases as a result of using additional train effort.

89 • The discussion on carpooling and ridesharing is very general. It does not include an adequate analysis to demonstrate that such a mitigation is feasible, i.e., if not feasible, the related impacts associated with employee traffic could be substantially greater than generally noted in the EIR.

Section 3.2, Water Quality:

The discussion in this section is inadequate because it:

90 • Fails to identify groundwater loss as a cumulative impact. Since fresh water will no longer be able to percolate through the ground on the project site to underground water supplies, but instead will run off and drain into a channel leading directly to the ocean, there will be a continual loss of fresh water recharge to the local ground water regime.

91 • Does not include adequate information to determine if the sheet flow from the project site will be of such quality as to require treatment prior to discharge into the storm drain or the Dominguez Channel. The mere statement that "storm drain design will incorporate oil and grease traps in the storm drains at the maintenance areas" is inadequate. The nature of some materials handled at the facility, i.e., inside the containers, is such that a general plan for containing sheet flow is essential for ensuring that substantial adverse impacts are not generated on the already poor water quality in the Dominguez Channel. Note also that Section 3.6 does not include the details of such a plan.

Section 3.4, Noise:

This section fails to adequately address the following key issues:

- Ground vibrations.
- Applicable noise ordinances.
- Significance and/or applicability of data in EIR, i.e., where relevant to proposed project and related impacts.
- Unavoidable noise ordinance violations.
- Suitable mitigations.

Specifically, the problems include the following:

- Ground vibrations are not addressed in the discussion of ambient conditions or potential impacts. Such vibrations are an issue of controversy and great public concern and merit a definitive, adequate quantitative analysis. The inclusion of three "may be" mitigations on pg. 3-54 without sufficient analysis, is inadequate. 92
- The use of the City of Long Beach's noise ordinance instead of the City of Carson's is not supported. Furthermore, no discussion is presented regarding the effect that violation of noise ordinances will have on operation of the ICTF. 93
- The applicability of CNEL to this situation is questionable, since CNEL is not a very well defined value in terms of practical applications. As a weighted average, CNEL can include many different sound levels, some of which may be unacceptable. No discussion of CNEL for nighttime is presented, when ambient noise levels are greatly lowered. SEL values which are very high may be generated while still remaining within CNEL ordinance standards due to the averaging effect. The critical omission is the absence of effective SEL analysis with respect to impacts of project generated noise on adjacent area, in particular the adjacent residential area. 94

95 • Some of the data presented in this section are incomplete or inclusive, e.g.:

- Noise measurement data in Table 15, page 3-34, are incomplete. Measurement times of only one hour are predominant, but the significance of the hour and its adequacy are not discussed.
- SEL values are given in Table 16, page 3-35, but their importance is not discussed.
- Figures 33a-d, pg. 3-40 through 3-42; Figures 34 and 35, pg. 3-44 and 3-46; Table 17-19, pg. 3-47 through 3-50, all show dB(a) values above ordinance standards. The importance of this is not discussed, nor its effect on the ICTF project. Also, the assumptions used to determine the projected values are not clearly defined.

96 • The fact that CNEL values will be violated is not addressed at all. Also, much of the increased noise is labelled as an unavoidable adverse impact, without determining the health effects of the noise nor its relationship to the ordinances which it violates, and why such impacts cannot be mitigated by changing the design of the project.

97 • The discussion on railroad related noise fails to provide essential data because it does not consider the present level of noise on the railroad tracks, and in turn the increase associated with the arrival of trains from outside the port areas, and the movement of railroad cars on the trackage at the terminal in order to accomplish the requisite loading and unloading of containers. Also, there is no analysis on the attenuation of sound during the planned nighttime activities, and the impacts of such attenuation on the adjacent residential area.

98 • The analysis of cumulative impacts is incomplete and requires substantial additional analysis. For example, the impacts associated with the coal export project, and the Los Angeles-Long Beach Light Rail project, etc., should be adequately evaluated and a list of potential scenarios and operational options with respect to the ICTF should be developed.

- Using remote storage of containers to act as a noise barrier to mitigate noise impacts is a totally inadequate solution. Remote storage of containers fluctuates on a weekly or even daily basis, and as such, is not viable. Also remote storage is not continuous, for spaces are required to allow equipment and vehicle passage and to maintain essential emergency equipment access, all of which will create corridors for the propagation of noise to the surrounding community. 99
- The mitigations for noise from equipment, rail and vehicle activities, etc., are not definitive. The specific references to bridge cranes and yard hostlers only outline possible mitigations, and so forth, e.g.: 100
  - Bridge crane noise reduction "may be achieved by enclosing the diesel/electric power plant and using residential class silencers".
  - Procurement of yard hostlers "can include a sound level requirement".
  - The freeway ramp extension noise barriers "may be included in the modification".
  - Rail movement noise mitigations "can be considered to reduce the potential impacts".
    - "San Pedro Branch of the Southern Pacific Railroad should be used as much as possible".
    - "Trackage along both branches should be upgraded to the extent possible".
  - Construction related noise can be mitigated by "the noise barrier which may be built as part of the project".

Section 3.5, Light and Glare/Aesthetics:

The analysis of light and glare, as well as aesthetics, needs substantial revision and it is important to include a complete analysis of the impacts of light and glare on adjacent areas. It is not adequate to indicate that the height of the lightpoles is based on economical 101

values without supporting that such height also results in the least potential impacts. Also, it is stated that "lighting will be maintained at various levels of illumination throughout the night." This means that there could be substantial impacts on the adjacent residential area if the light and glare/aesthetic mitigations are not properly executed. Also, the statement that "the lighting system will be designed to minimize unwanted light and glare leaving the site by focusing lamps and by the use of hoods and shades on the site boundary lights" is not definitive. Such a mitigation leaves substantial opportunities for excessive light glare, particularly during the period between midnight and daylight, and also implies that the suggested spacing and height of the light poles is appropriate, while, in actuality, it may be more appropriate to increase the number of poles, decrease the height of the poles, and develop an operational scenario for the total facility which minimizes the need for continual use of lights along that portion of the project site adjacent to the residential area. The major concern regarding the adequacy of this discussion is the conclusionary assumption that the proposed operational procedures are absolute, and that the only possible mitigations are to be based on those operational procedures. In point of fact, it may be possible to alter the operational procedures so that light and glare impacts are substantially less than those presently listed in the Draft EIR.

Section 3.6, Safety:

The analysis in this section fails to adequately address the following major issues:

- Coordination with other key local agencies.
- Separation of hazardous materials.
- Codes applicable to ICTF safety measures.
- Feasibility of safety provisions.

Specifically, the section is deficient in its treatment of the following:

102 • There is no mention of the City of Carson's role in the safety plans for the ICTF. As a municipality, in which portions of

the proposed project will be located, the City of Carson must be included.

- A detailed analysis on hazardous materials handling is lacking, for example:
  - The specific location and design of the hazardous materials segregation area is not listed. 103
  - The amount and type of non-water fire fighting equipment is not delineated or locations given for such equipment. 104
  - No mention is made of provisions for radioactive waste handling, storage, and accident strategy. 105
- Relationship of safety planning to the surrounding community is not outlined, nor are the existence of any general evacuation measures for the area noted. 106
- The codes applicable to the ICTF and the method of implementation are not outlined, as required by Divisions 17 and 5 of the Building and Safety Code of the City of Los Angeles. 107
- The locations of hydrants with respect to major features of the project development are not shown on Figure 39. 108
- Mitigations of impacts on community safety are lacking. 109
- Impacts and related mitigations for potentially significant fire hazards from materials handled at the ICTF and the adjacent Macmillan Ring-Free Oil Co., Inc. facility are not considered. For example, if there is a fire at the ICTF, it could cause the flammable materials at the Macmillan facility to explode, or vice versa. 110
- Mitigations involving the extension of services of or the addition of Los Angeles Fire Department facilities are not feasible as proposed in the EIR. 111
- Hazardous materials spillage procedures should be developed, including an <u>extensive</u> program for emergency evacuation of the vicinity – particularly for airborne contamination problems. The program should include at least the following: 112

- Criteria for defining emergency conditions.
- Appropriate emergency/evacuation radius based on extent of danger associated with various materials.
- Method of notifying residents of potential problems or emergency procedures.
- Pattern of evacuation and related routes based on potential for conflict with emergency vehicles movements, etc.
- Coordination with local fire and police departments, schools and radio stations.
- Procedures for establishing and operating a "hotline" for local citizens to register complaints and obtain relevant information.

Section 3.7, Socioeconomics:

The EIR fails to address or enumerate a number of significant costs of the project relevant for evaluating impacts, i.e., cost of construction activities, cost of operations, cost of purchasing land, cost of condemnation of presently owned or long-term leased land, etc. Since many of these items were not enumerated, the estimated savings per container described on page 3-78 of the EIR is not correct. The general nature of the discussion in this section is quite conclusionary, i.e., based on an apparent assumption that relocating the facility as proposed will result in substantial savings. Some of the areas in this section which need revision, addition and/or correction include the following:

- The EIR fails to address ambient transport costs, i.e., cost per container, total estimated transport costs. These data are necessary along with actual costs (not cost savings) expected with implementation of the ICTF project for an accurate assessment of impacts. The cost savings information provided is based primarily on truck miles saved, but actual costs would involve several other factors, e.g., cost of construction, cost of purchasing land, etc.

113

- The EIR fails to address the economic impacts of the project on adjacent businesses, such as: 1) the costs to Import Dealers Service Corp. for relocating the existing truck entrance together with the impacts on operational efficiency because of the inability to continue to utilize the existing entrance, and 2) the costs to Macmillan Ring-Free Oil Co., Inc. to abandon, in part, the $250 million dollar expansion project that already has received all needed discretionary approvals, and has been under planning and preparation for eleven years. 114
- The EIR does not address anticipated fees at the ICTF. Considering the number of indirect costs, e.g., land purchasing, construction activities, etc., the ambient fees should be compared with the expected fees after implementation of the ICTF facility. 115
- The EIR does not address revenues adequately because there is no discussion of specific activities, etc., that generate revenue for the ICTF and/or for the local area, e.g., fees for container transportation, utility fees, property taxes, etc. The EIR merely states that private companies pay about 30% of their gross revenue toward wages and salaries, 40% on purchases for material inputs, 10% in taxes and 20% is retained earnings for the firm. Such general economic forecasting is not adequate to determine whether there are adequate economic benefits associated with the proposed project as opposed to the ambient operations elsewhere. 116

Section 3.8, Transportation and Circulation:

The analysis listed below illustrates the need for clarification, extension and objective evaluation of the data on transportation and circulation.

117 • The impacts of project construction on vehicular traffic and circulation are not well analyzed and there are no data offered either to support the omission of such data or to indicate the level of project construction vehicular traffic and circulation impacts.

118 • There is an inadequate discussion on the ambient number of vehicles traveling Sepulveda Street and/or Willow Street, Route 47, Santa Fe Avenue, Alameda Street, etc. Without such a discussion, it is impossible to determine the impacts associated with the increase in traffic when the proposed project becomes operational.

119 • Rail connection construction impacts are not clearly described. Although it is stated that construction will make it necessary "to provide adequate protection or relocation of existing substructures and utilities," there is no analysis of the effects on existing traffic levels and related traffic safety measures needed during the temporary realignment of traffic flows.

120 • The highway improvement program recommended by the SCAG Ports Advisory Committee is used in this discussion as if it is a fait accompli. In reality, it only is a potential plan, and should be evaluated as such in the EIR along with other relevant alternatives.

121 • The Caltrans planned extension of Route 47 interferes directly with the ICTF project. This route has been adopted in the State Highway Routes of the Streets and Highways Code, it is included in the adopted General Plan of the City of Long Beach, etc., and unless alternative routes are evolved, the ICTF plans will be substantially altered. Further, regardless of the final location of Route 47, it is appropriate in the EIR to discuss the impacts of completing construction of the ICTF on realistic alternative locations of Route 47.

- The discussion of delays at the at-grade rail crossings is inadequate in that it does not state the net effect that such delays will have on overall vehicular traffic and circulation. For example, it is noted that the "Del Amo Boulevard crossing may experience a total additional daily blockage delay of approximately 110 minutes in the year 2000." If this is true, such an impact merits greater discussion and analysis than presently in the Draft EIR. 122

- There is no discussion of the effects of road improvements on vehicular access to existing businesses and residences. For example, discussions should be added to consider the following:

  - Macmillan Ring-Free Oil Co., Inc. has an average of 30-40 trucks per day entering/exiting its facility. On some days the number of trucks approaches 100. Impacts on this existing traffic flow should be considered in the EIR. 123

  - The Import Dealers Service Corporation (IDSC) facility would lose an existing truck entrance if the ICTF plans are implemented. There is an average of 33 IDSC trucks with 6 loads per day using this facility, plus up to 150 additional commercial carriers. If all such traffic is limited to the Sepulveda Boulevard entrance, as presently proposed, there will be no left turn entrance. This constitutes a significant safety problem and, if not altered, adds substantial traffic impacts to the present IDSC operation. 124

- There is no quantitative analysis in the EIR of the effects on vehicular traffic and circulation from train traffic due to the operation of the light rail transit project and the coal export project proposed for the Port of Long Beach. For example, the coal project will use existing Union Pacific trackage 125

immediately adjacent to the ICTF site. The cumulative impacts of these projects appear to be very significant, particularly for ground shaking, noise, train movements, emissions from locomotives, etc.

- Construction impacts on traffic are mitigated only vaguely and very generally. For example, the notation that "the construction
126 plans for the rail access and the truck access were developed in order to minimize the disruption of traffic and maintain through traffic flow during construction" is a laudable and appropriate goal, but it does not constitute a mitigation of the related impacts.

- A number of the at-grade delay mitigations are not definitive, for example:
  - Such delays "can partially be mitigated by installation of grade crossing predictors (GCP), improved traffic signalization, and improved lane geometric design." These mitigations
127 should be clearly identified with a listing of specific locations of signals, type of lane geometric design and location, etc. General planning assumptions are not adequate to assess whether potential impacts will be adequately mitigated.
  - "If a greater proportion of double stack trains is used, a substantial decrease in the anticipated rail-associated
128 impacts may result." This statement is an assessment of the situation, and does not specify the mitigations needed to ensure that the impacts are minimized.
  - "If rail and vehicular crossing grade separations are included in the light rail project, major circulation impacts would
129 be mitigated." This type of mitigation analysis is not adequate since it merely identifies general mitigations and does not include the specific character of the mitigations needed to ensure that impacts from the ICTF are mitigated as needed. Further, such an approach does not allow the appropriate

decision-making body an adequate opportunity to complete an essential requirement of CEQA to mitigate or avoid significant environmental effects of projects it approves or carries out whenever it is feasible to do so.

COMPARISON OF GENERAL FORMAT AND CONTENT OF EIR WITH CEQA GUIDELINES:

There are a number of inconsistencies between the EIR and the CEQA Guidelines, which include, but are not limited to the following:

- Incomplete Table of Contents
- Absence of clearly labeled discussions on selected topics
- Content of Executive Summary
- Description of the project
- Discussion on regional characteristics
- Discussion on related projects
- Alternatives analysis
- Long-term impacts analysis
- Inconsistency between content of Initial Study and the EIR

The above inconsistencies can be illustrated by the following:

- The Table of Contents does not conform to the Table of Contents requirements as outlined in the City of Los Angeles guidelines, which we are advised by City Planning Department staff must be followed explicitly in preparing an EIR. For example, relevant discussion on land use is not located in Section 3 along with other issues concerning environmental setting. 130
- The topics are not separated into distinct sections or clearly identified in the Table of Contents. This makes it very difficult to review all the information related to a specific impact. The document should, in accordance with Article 9, Section 15140(a) of the State CEQA Guidelines, describe where in the document the issues are discussed, e.g., Section 1.0, Rail Access is described on page 1-4, but then several pages later (pp. 1-11 to 1-17) additional information on rail access is presented without any indication or clarification. 131

- The Executive Summary in the EIR does not address all relevant issues, e.g., ground vibrations from train and truck movement
132 in and around the project site, which is required by Article 9, Section 15140(b) of the State CEQA Guidelines. This same section of CEQA Guidelines also requires that the summary include information on the issues resolved, e.g., discussion on alternatives. However, the EIR Executive Summary merely lists the alternatives without any relevant discussion and it does not indicate why the proposed project was chosen from among the various options.

- Little or no discussion is included on the general description
133 of the project's economic and environmental, as well as, technical characteristics, which is required per Article 9. Section 15141(c) of the State CEQA Guidelines. For example, the only reference to economic issues in the Project Description section seems to be on page 1-39, where the EIR states that the project will be self-supporting by collecting gate fees. Yet no data are given to support this conclusion, and, in fact, this information does not appear in Section 3.7, Socioeconomics.

- According to State CEQA Guidelines Article 9, Section 15142(a), "knowledge of the regional setting is critical to the assessment of environmental impacts." However, the Draft EIR does not
134 adequately address numerous regional characteristics, e.g., relative proportion of residential land use versus other land uses, proximity of project to adjacent residential areas, etc. In fact, the only figure that appears to address adjacent land use to the project site (Figure 27, Adjacent Property Ownership) does not even include all of the land anticipated to be required for the project's three phases, let alone adequately indicating significance of adjacent uses. Although the text identifies adjacent parcels, in Section 2.0, page 2-6, it does not state even an approximate acreage of these parcels for any reasonable evaluation of potential impacts.

- State CEQA, Article 9, Section 15142(a), states that both public and private existing and planned projects in the region of the proposed action should be considered. However, Section 2.0 of the EIR concerning relationship to other projects only refers to governmental and not private plans, policies, or controls. Relationship to some private projects occasionally is addressed but only briefly in other sections of the EIR, e.g., in Section 3.4 the noise impacts of the export coal project and light rail transit project are noted. 135

- State CEQA, Article 9, Section 15143(d), requires that an EIR "shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives substantially impede the attainment of the project objectives, and are more costly." The EIR, rather than addressing adverse environmental effects as justification for not considering alternative site locations only includes information on additional land cost, required construction costs, and problems relating to other operations using the existing rail yard. 136

- Article 9, Section 15143(e) of the State CEQA Guidelines requires that "special attention should be given to impacts which narrow the range of beneficial uses of the environment." In Section 4.0, Long-Term Implications, of the EIR, it is simply stated that "there will be a permanent but minor loss of terrestrial habitat and agricultural land as a result of paving of the site. The acreage lost is very low." Considering the fact that almost 260 acres of land will be paved, the EIR inadequately addresses the impact of permanent reduction in terrestrial habitat and agricultural land. 137

- Numerous inconsistencies can be found between information provided in the Initial Study and in the EIR. Even though the existence of significant environmental impacts is acknowledged in the Initial Study Checklist, there is no related discussion in 138

the EIR. For example, a separate section on Risk of Upset is not included in the EIR despite the possibility, as noted in the Initial Study and EIR Summary Sheet on Possible Impacts, that the project may involve "risk of an explosion or release of hazardous substances in the event of an accident or upset conditions." Also a section on Human Health is missing, since the Initial Study notes that the project may create a "health hazard or potential health hazard" or "exposure of people to potential health hazards." Finally, a section on Mandatory Findings of Significance is missing in the EIR despite the fact that the Initial Study states that the project may "have impacts which are individually limited, but cumulatively considerable" and "may have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly." Limited discussion of certain of these topics is scattered in the different subsections of the Environmental Impact section of the EIR, but such analysis is incomplete or inadequate. Finally, some aspects of the project which were not considered to entail a significant environmental impact in the Initial Study Checklist, are, nevertheless, discussed at length. For example, there is a lengthy discussion on nonagricultural plant life, for which a significant environmental impact was not acknowledged in the Initial Study Checklist.

GENERAL CONCLUSIONS:

Based on our review of this EIR, plus our experience in preparing over 50 EIR's in the past five years, plus the preparation of hundreds of feasibility studies and environmental assessments, we conclude that the EIR for the ICTF, as presently constituted, is very inadequate because:

139 • The EIR fails to consider a number of environmental impacts which could result in significant problems.

- The EIR fails to include all relevant information on a number of major issues which could result in significant environmental impacts. 140
- Almost all of the mitigations proposed in the EIR are general, often illustrative, as opposed to specific. Absent specific mitigations, it is impossible to determine if the project impacts will be properly mitigated. 141
- The description of the project in the EIR fails to consider immediately adjacent residential areas, fails to consider private ownership and/or long-term leases for property which will be included in the various phases of the project, and fails to consider the concerns/controls of the City of Carson. 142
- The discussion in a number of segments of the EIR is conclusionary rather than objective and often is not based on a realistic assessment of the project characteristics and related environmental impacts. 143

Considering all the above, the EIR should be rewritten, appropriate information added in accordance with State and City CEQA Guidelines, and adequate mitigations proposed. Until such revision is completed it is impossible to determine realistically the extent and character of all the project related impacts, and, in turn, impossible to determine what specific mitigations are needed. After revision, the EIR should be recirculated so that proper review can occur. 144

Sincerely,

Donald B. Bright

DBB:vc

LACTC

LOS ANGELES COUNTY TRANSPORTATION COMMISSION • 354 SOUTH SPRING STREET—SUITE 500, LOS ANGELES, CALIFORNIA 90013 • (213) 626-0370

July 21, 1982

RECEIVED
JUL 23 1982
PLANNING
DIVISION

RICK RICHMOND
EXECUTIVE DIRECTOR

Mr. Leland R. Hill
Director of Port Planning
Port of Long Beach
Post Office Box 570
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Mr. Calvin Hurst
Harbor Environmental Scientist
Port of Los Angeles
Post Office Box 151
San Pedro, CA 90733

Dear Messrs. Hill & Hurst:

INTERMODAL CONTAINER TRANSFER FACILITY - DRAFT EIR

The Los Angeles County Transportation Commission (LACTC) would like to comment on the Draft Environmental Impact Report (EIR) for the Intermodal Container Transfer Facility (ICTF). Our remarks concern the ICTF's impact on both highway and rail transportation, and the Alternatives Analysis section of the report.

Highway Impacts

Although the proposed ICTF will have some adverse impacts on traffic circulation, the LACTC believes that suitable mitigation measures have been identified in the Draft EIR and in the Ports Advisory Committee's phased program of highway improvements. The LACTC has approved this phased program of highway improvements as a replacement to extension of the Terminal Island Freeway (Route 47), contingent upon the development of a financial plan.

Rail Impacts

The net effects of the ICTF and the LACTC-sponsored Los Angeles-Long Beach light rail transit line on the Southern Pacific's Wilmington Branch rail line have not yet been fully determined.

Appropriate mitigating measures for the increased rail traffic on Southern Pacific's Wilmington Branch line will be studied through the Los Angeles - Long Beach light rail transit line's environmental review process. At this time, we hope to avoid light rail conflicts with both existing and ICTF-generated freight train trips (14 additional ICTF-generated trips in each direction) through construction of separate tracks and siding facilities. Mitigation measures for vehicular traffic, such as grade separations, will be evaluated based on the impact of-the light rail transit line on cross street traffic and the benefit to light rail transit *users* of grade separations.

Alternatives Analysis

145 The Alternatives Analysis appears to devote too little attention to the regional importance of the ICTF. This could be better addressed through a discussion of alternative capacity improvements for other Southland Ports, and their benefits in relation to the proposed ICTF.

We appreciate the opportunity to review and comment on this report.

Sincerely,

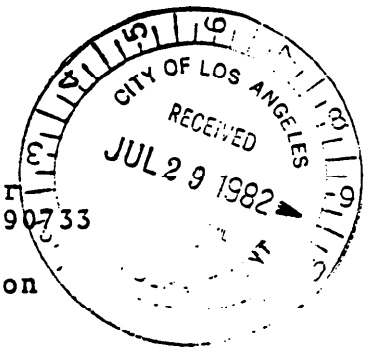
RICK RICHMOND
Executive Director

RR:DP:vb

cc: Jim Gosnell, SCAG
Art Goodwin, Port of Los Angeles

FORM CEN. 160 (Rev. 3.788)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE



Date: July 22, 1982

To: Lillian Kawasaki, Environmental Scientist, Harbor Department, Post Office Box 151, San Pedro, CA 90733

From: Donald V. Mello, Battalion Chief, Planning Section Fire Department, Room 1010, City Hall East

Subject: DRAFT EIR - INTERMODAL CONTAINER TRANSFER FACILITY

146

The Fire Department has reviewed the subject Draft EIR and offers the following comments.

1. A Division 5 Permit from the Fire Department will be required for the installation of underground fuel tanks.

2. More detailed plot plans should be provided with greater detail prior to any approvals.

3. Automatic aid or mutual aid agreements must be secured between the Cities of Los Angeles and Long Beach and the County of Los Angeles.

4. Fire lanes with adequate turning radii at the crossover or division roadways should be provided so that fire apparatus may turn from one fire lane to another. (This point can be clarified with a review of the drawings.)

5. Other fire and public safety measures may be required in the future as more details are made available for review by the Fire Department.

ALLEN R. EVANSEN
Chief Engineer and General Manager

DONALD V. MELLO
Battalion Chief
Planning Section

DVM:LEH:lng:0129F

cc: Councilwoman Joan Milke Flores
Fire Marshal
Engineering and Hydrants Unit

RESPONSES TO COMMENTS

(1) It is not anticipated that the vehicular speed limit on Alameda Street will be increased from the present limit of 45 mph.

(2) The railroad grade separation of Alameda Street is proposed to eliminate train/vehicular traffic conflicts. The anticipated changes to Alameda Street will be limited to the grade separation of Alameda Street in the vicinity of 223rd Street to provide rail access to the ICTF site. A description of the work to be accomplished is given in Section 1.3.2.1.1 of the Draft Environmental Impact Report (EIR). The width and configuration of Alameda Street in the vicinity of Carson Auto Wrecking would remain as they exist today.

(3) Accessibility to Carson Auto Wrecking and other businesses along Alameda Street will be provided. The rail access grade separation of Alameda Street will be constructed in phases, and a temporary detour roadway provided. In this way Alameda Street, the San Diego Freeway on/off ramp to Alameda Street, and the 223rd Street on/off ramp to Alameda Street will remain open to vehicular traffic throughout the construction period.

(4) The Southern Pacific Transportation Company (SPT Co.) is currently cooperating with traffic engineering personnel from Los Angeles County and the cities of Los Angeles and Carson to develop mitigation measures for the potential increases in traffic delays caused by ICTF trains at grade crossings.. Public Works Department of the City of Carson and the SPT Co. have held technical conferences to discuss possible mitigating measures for rail switcher movements across Del Amo Boulevard and Carson Street crossings.

(5) The two statements are not conflicting. Positive economic benefits as stated in the Executive Summary will be derived when the ICTF is implemented. The statement on page 3-73 refers to the existing (pre-ICTF) condition. Since the majority of the land proposed for the ICTF is now vacant or occupied by only a few tenants, there are little economic benefits <u>currently</u> being generated.

(6) A statement as given in the Errata sheet has been added to Section 1.1 Project Location and Boundaries which clearly states that the fifteen acres of the Watson-owned property is in the City of Carson.

(7) Because the Watson Land Company property is in the City of Carson, the property can not be acquired by condemnation proceedings by the Ports of Los Angeles and Long Beach.

(8) The adjacent property ownership has been reviewed, and a revised Figure 27 which includes the present zoning is provided in the Errata section,. Note that Figure 27 represents the <u>existing</u> property ownership. A description of the parcels that will be required for each phase of the ICTF development is presented in Section 2.1.1 and Figures 24-26 of the Draft EIR.

(9) Prior to the preparation of the EIR an the ICTF, the Parts of Las Angeles and Lang Beach undertook a feasibility study to determine, among other things, if the facility could be constructed, expanded and operated such that the reduced transportation casts plus transfer fees remain at or below current usage cast of the three existing rail yards near downtown Las Angeles.

Chapter 13, Cast and Economic Analysis in the "ICTF Feasibility Study" (prepared by ScOtt/DMJM) examines the unit cast per container, taking into consideration operating casts, amortization of fixed facilities and return an land investment. Copies of this report are available at both Parts.

Results of this study indicated that, while capital costs will be substantial, the operating casts will be sufficiently law that the combination of operating costs, amortization of capital debt service and land use fee per unit container during each of the operating phases will make use of the ICTF attractive to container terminal operators and shippers. This will make the use of the ICTF competitive with or of lower cast than use of existing rail yards. The favorable results of the feasibility study led the Parts to pursue development of the project, which included preparation of an EIR, The estimated savings per container described an page 3-78 are listed as transport savings and should not be interpreted as including construction, costs, etc.

An EIR is an informational document which will inform the public of the environmental effects of the project. Section 15012 of CEQA Guidelines as amended 26-82, does not require disclosure of economic information. Section 15012(b) states "economic information may be included in an EIR or may be presented in whatever form the agency desires."

(10) Assembly Bill 3375(Elder) was approved by the California State Legislative an August 25, 1982 and was signed by the Governor an September 10, 1982.

(11) Unit container trains will not cross Sepulveda Boulevard. Only locomotives moving between the outside return tracks and the unloading tracks will cross Sepulveda Boulevard. Track design is such that no more than fourteen (14) movements per day are anticipated in the ultimate ICTF development phase. Approximately six (6) movements per day across Sepulveda Boulevard are expected during the first phase of development. Traffic delay should be of very short duration, less than four (4) minutes per movement.

(12) Traffic delays an Sepulveda Boulevard are not anticipated. The majority of vehicular traffic travelling to/from the ICTF will be an Sepulveda Boulevard only for a short distance. Vehicular traffic will principally travel via the Terminal Island Freeway or Alameda Street to Sepulveda Boulevard. Through truck traffic on Willow Street eastbound toward the Lang Beach Freeway will not be permitted since Willow Street will be designated as a non-truck route.

Additionally, there are numerous improvements proposed to facilitate truck access to/from the ICTF site. The ICTF entrance/exit an Sepulveda Boulevard will include separate entrance and exit lanes to segregate and facilitate traffic flaw. Traffic signals will be installed at this intersection. Roadway improvements at the intersection of the Terminal Island Freeway and Sepulveda Boulevard/Willow Street will also be accomplished to eliminate potential traffic congestion.

The volume/capacity analysis far the year 2000 shows that the projected levels of service for the intersections along Sepulveda Blvd. in the vicinity of the ICTF will remain the same with or without the ICTF project.

(13) Public agencies and private parties affected by the ICTF project were contacted. Specifically, the City of Carson and the County of Los Angeles (Road Control and Road Departments) were sent Notices of Preparation of the Draft EIR, copies of the Draft EIR, and copies of the preliminary engineering plans far the ICTF construction.

(14) See Response No. IO.

(15) For information regarding hazardous material handling and safety, see Response Nos. 106-112. Additional light from the ICTF onto Sepulveda Boulevard should enhance traffic and pedestrian safety at night,. Additional glare from the ICTF should be minimal and would not create a traffic safety problem.

(16) Pages l-39 and l-40 of the Draft EIR provide a list of Responsible Agencies and the approvals/permits for which the EIR may be used in their decision-making.

The "limited action" alternative is discussed an pages 5-8 and 5-9 of the Draft EIR under Section 5.5.4 Reduced Development Alternative,

(17) A 'review of the Draft EIR identified the need to conduct additional studies an potential impacts of train vibration and air emissions an adjacent residential areas. The summaries of theses studies are given in Response Nos. 50 and 51, respectively. Supplemental information an hazardous materials that may be handled at the facility and the proposed safety procedures are given in Response Nos. 45 & 46 and 103-112. Other potential impacts were found to have been adequately addressed in the EIR. Based upon the review and the comments received an the EIR, a re-write of the Draft EIR is not warranted.

(18) Air quality impacts of the ICTF an adjacent residential areas are anticipated to be insignificant (see Response No. 51). With regard to traffic impacts, the development of an industrial park at the northwest corner of the interchange between the San Diego and Long Beach Freeways should have a negligible cumulative impact with the ICTF-generated traffic. Trucks utilizing the ICTF will transport containers principally to/from the Part's area. Implementation of the ICTF will reduce traffic an these two freeways. The traffic study completed far the project identified no impacts from this project an Santa Fe Avenue in the vicinity of the Windward Village entrance.

(19) The statement regarding the noise insulation of new residential construction refers to a general policy regarding railroad noise as given in the Long Beach Noise Element (Table 14 an Page 3-31 of the Draft EIR). No new residential construction is included in the ICTF project.

(20) Referring to the vibration analysis report by Bolt Beranek and Newman Inc. (see Response No. 50), none of the homes along either rail corridor (Wilmington or San Pedro branches of the SPT Co.) or adjoining the ICTF site were determined to experience vibration levels that result in structural damange at any time.

(21) The analysis conducted to determine the potential noise impacts of the ICTF found that ICTF-generated noise will not significantly contribute to the community noise equivalent level (CNEL) at Windward Village Mobile Park. ICTF trains will not travel on Union Pacific tracks, including those tracks adjacent to Windward Village. As such, there is no significant noise impact an Windward Village from the project, and installation of noise barriers at this * location are not warranted. As part of the ICTF project, noise barrier walls will be incorporated into the project along the northeastern boundary to the ICTF.

(22) Cumulative impacts of train traffic from the ICTF and the two proposed coal projects were considered in the Draft EIR. Since coal trains will travel an either Union Pacific fit or Santa Fe Railroad tracks, and ICTF trains will travel an Southern Pacific tracks, no significant cumulative impacts to Windward Village were identified. Future noise impacts at Windward Village will be associated with additional raft movements an Union Pacific Railroad tracks and not from ICTF-generated operational noise.

(23) The City Attorney from City of Long Beach in the letter provided with), Windward Village's comment letter summarizes the agencies with regulatory control over railmad operations, as mandated by law. The concerns expressed in this comment are not related to the ICTF project (see Response Nos. 21 and 22).

(24) Implementation of the ICTF will provide a more efficient container transfer operation at a centralized location close to the Parts' marine terminals. The ICTF will result in reduced truck travel, reduced fuel consumption, and reduced air emissions to the Basin.

(25) The engineering design features of the project will be developed in cooperation with the appropriate governmental agencies with jurisdictional controls and permit authorities. The features will be designed utilizing good engineering practices, local building codes, and accepted industry standards. The resolution of specified engineering design features and problems will be solved to the satisfaction of the concerned agencies during the final design and permitting process.

(26) The estimated number of containers containing hazardous materials is very conservative, and the number of these containers may be considerably less than projected. All containers carrying hazardous materials will not contain chemicals. Items such as fire extinguishers, charcoal barbeque briquettes, butane-filled lighters, cologne, liquid cement, paint, and various alcoholic beverages are also designated as hazardous materials and will be shipped.

Emergency response measures will be coordinated with SPT Co., the City of Los Angeles and Long Beach Fire Departments, and the Los Angeles Harbor Department Port Warden's office (See Response Nos. 106412).

(27) See Response No. 25

(28) See Response No. 25

(29) The figure was mislabeled. The property is owned by the Port of Los Angeles and is not the Terminal Island Freeway intersection.

(30) For responses to Items 1,2,3 see Response No. 25.

(31) The Level of Service for the intersection of Alameda Street and Sepulveda Boulevard as shown in Table 24a was calculated as "A". This was based on the "Intersection Capacity Utilization" (ICU) method of intersection analysis. However, field observations at this intersection showed traffic queuing at P.M. peak hours. This condition occurs because Sepulveda Boulevard has only one travel lane in each direction, although the eastbound approach to Alameda Street& has been widened to provide two through lanes and a left-turn lane. Although the intersection has been improved (hence, the calculated Level of Service of A), there is a constriction on Sepulveda Boulevard with the resultant queuing during peak hours.

(32) Several of the total annual container movements represented on Table 2 are incorrect. A corrected Table 2 is given in the Errata Section. The container movements as stated in Table Cl are accurate and were used for the traffic analysis study.

(33) Table Cl represents the projected number of containers to and from the respective geographical areas of the two Ports. Since more containers are received at the* Ports, there would be an excess of truck tractors only at the facility. The empty tractors would pick up containers at the ICTF and transport them back to one of the Ports' container marine terminals. Transport efficiency is one of the major benefits of the ICTF; that is, a large pool of containers are concentrated in close' proximity to the Ports thus allowing two-way shuttling of containers and eliminating unnecessary truck

tractor movements. There are several trucking companies today that operate on this concept, and match containers to truck tractors through various contracts with marine shipping lines.

It would be unrealistic to assume every truck tractor arriving at the ICTF would be matched to a container returning to the Ports, so a 20% empty factor was applied. This value was determined by a survey of the local trucking firms engaged in this type of business in the Ports. A 40% empty factor was applied for local containers not originating from the Ports. The matching of truck tractors to containers will be mare difficult for this movement. Both of these empty factors are considered conservative, and a more efficient match would reduce the total truck trips to and from the ICTF. An example comparison of Tables C1 and C2 for the year 1983 shows that an average of 486 containers (Table Cl) are required to be moved between the Ports and the ICTF a day and that it would require 351 round trio truck movements (Table C2) to move the containers. Thus, there are fewer total truck movements than containers transported.

(34) The grade crossing computer simulation study was reviewed and showed that seven additional trains per day would result in increased blockage times of 30-110 minutes in the year 2000 at the identified grade crossings. Seven additional trains per day from the ICTF represents a seven fold increase in through train movements. Currently there is one through train per day on the affected rail corridors. However, blockage also results today from switching and non-through freight train traffic. Normal operation for ICTF trains will be non-stop movement to/from the ICTF site to/from the downtown rail yard area.

The SPT Co. will work with the Public Utilities Commission and local jurisdictional agencies to develop mitigations for impacts to traffic delay at at-grade crossings (See Response Nos. 4 and 75).

(35) The ICTF will increase train activity and add to vehicular traffic delay at at-grade crossings. However, construction of grade separations (other than at Alameda Street in the vicinity of 223rd Street) as part of this project is not warranted, particularly in light of the proposed phased development of the ICTF. In the first phase of the project, only two to four unit trains per day are anticipated.

The Los Angeles-Long Beach Light Rail Transit project is still in the feasibility study phase. Based on preliminary analyses, it would appear that implementation of the IA-LB Light Rail project would require improvements to existing grade crossing protections and several grade separations at heavily travelled cross streets. (See c-ant letter received from the Los Angeles County Transportation Commission).

(36) The potential cumulative impacts of the ICTF, the Light Rail Transit and the proposed coal projects were discussed in the EIR. Coal trains to the San Pedro Bay area will travel on Union Pacific and/or Santa Fe raft lines, while ICTF containers will move on Southern Pacific track. It is felt that these rail corridors in the area from the ICTF to downtown Los Angeles are separated by

sufficient distance to avoid cumulative traffic impacts. The possible exception would be at the crossing of the Southern Pacific's Wilmington Branch by Santa Fe's Harbor District Railroad Track line at Slauson Junction. As the train traffic increases through this crossing, particularly with implementation of the Light Rail Transit proposal, a railroad grade separation at this junction will have to be considered.

(37) If the proposed Light Rail Transit project was to be developed within the Southern Pacific's right-of-way, extensive rail improvements would be required to eliminate the obvious conflicts of freight and passenger trains using the same trackage and corridor. The existing right-of-way has only single tracks or short sidings in a majority of the corridor. It would require double main line tracks and additional passing trackage to allow two-way freight and passenger train operations. This would only occur after a negoitated agreement between the Southern Pacific and the operator of the light rail service.

While it is true that the shorter, light weight passenger trains may require different grades of approach to highway grade separations than longer, heavier freight trains, from a practical standpoint, if both types of service were in the same rail right-of-way, the same design criteria would have to be used for both. Within a double track arrangement, one track could not be separated from a highway crossing without the other. These design and operational problems must be resolved through negotiations with the concerned parties at the time passenger service is to be implemented.

(38) Assembly Bill 3375, which was signed by the Governor on September 10, 1982, has a provision that a financial plan, including potential local participation, be. prepared by the Los Angeles County Transportation Commission.

(39) The California Regional Water Quality Control Board will be contacted prior to the start of construction to determine whether an NPDES permit is required.

(40) A storm drain system will be installed as part of the ICTF project. A permit will be acquired for any construction affecting the L.A. County Flood Control District (LACFCD). The EIR acknowledges that the LACFCD is a responsible agency.

(41) The ICTF will incrementally add to traffic congestion on the local street system. However, the increase in ICTF truck movements will have little or no impact on the traffic flow at key intersections in the vicinity of the ICTF. This is shown in Tables 27 and 28 of the Draft EIR. With the exception of the intersection at Anaheim Street and Santa Fe Avenue in the null alternative, the calculated Levels of Service for the "with ICTF" vs the "without ICTF" conditions are the same. As such, the ICTF will not have a significant impact on the traffic circulation. The traffic analysis does show that without highway improvements, the future traffic volume in the Port's area will exceed the design capacity of the street system. SCM identified problem areas on the existing street network and developed a "Phased Program of Highway Improvements" that would

increase the capacity of the existing street network to accommodate the traffic growth that will occur (with or without the ICTF). This program does include extensive highway improvements to Sepulveda Boulevard and Alameda Street which would increase traffic service in the area adjoining the ICTF site. This program is incorporated into Assembly Bill 3375 which has been signed by the Governor.

(42) For the design comments given in items I-6, see Response No. 25.

(43) The Ports cannot impose on the ICTF the requirement of not proceeding with the construction of the project until the California Department of Transportation takes the necessary actions to ensure implementation of the "Phased Program of Highway Improvements** as suggested by SCAG. This would place the project into a position of depending on another government agency's actions. The Ports will cooperate and participate, to the fullest extent possible, with all the concerned governmental agencies with jurisdictional responsibility for transportation planning and improvement project implementation.

Assembly Bill 3375 (Elder) would rescind the existing adopted route for the extension of the Terminal Island Freeway between Willow Street and the San Diego Freeway. AB 3375 was approved by the State Legislature and signed by the Governor (see Response No. IO).

However, if the existing Route 47 extension were not rescinded, construction of the ICTF would not preclude the construction of the extension of the state highway A review of the existing highways and the topography of the area reveals that for the extension to be completed, the new roadway would have to be elevated over the Union Pacific main line tracks southerly of Willow Street and remain elevated over Sepulveda Boulevard. On the northerly end, a full interchange with the San Diego Freeway or 223rd Street would require an elevated ramp arrangement. With both ends of the highway elevated, an approximate length of one half mile could be at the existing surface grade. This is the section that would interfere with the ICTF site. This section, if elevated, would not seriously disrupt the operation of the ICTF. This shows that both the ICTF and the State Route 47 extension could be built in the same location as long as the highway was on a raised structure passing overhead of the rail yard.

(44) The concern that ICTF trucks might utilize a route to the ICTF via the Long Beach Freeway and Willow Street can be alleviated by designating this segment of Willow Street as a "non-truck route". A "non-truck route' designation can be accomplished by an amendment to the Long Beach Municipal Code. The most logical truck route to the ICTF from the Port of Long Beach is the Long Beach Freeway/Harbor Scenic Drive north to Anaheim Street, west to State Route 47 and north to Sepulveda Boulevard.. However, there is no practical method of enforcing the requirement of using a specific street route to the facility. A street signage program which designates the recommended route will be established.

The recommended improvement for the access to Route 47 northbound from Anaheim Street westbound is included in SCAG's proposed highway improvement program.

(45) Radioactive materials are not proposed for storage and transport in containers as part of the ICTF project. A survey of the SPT Co. container traffic at Los Angeles during 1981 indicates that of 1,454 containers carrying hazardous materials, no containers with radioactive materials or waste were handled.

(46) A list of the hazardous materials which are projected for storage and handling within containers at the ICTF is presented herein (see following Table of Hazardous Materials). This projection is based upon the compiled records of the SPT Co. container traffic at Los Angeles for the year 1981. Each category of hazardous material is broken down into its component parts, and the number of containers which were handled with that product as a full *or* partial load is also indicated. As can be seen from this list, the majority of hazardous materials are items which are commonly used in industrial processes to prepare household items or directly utilized as household items. Please note-' the absence of extremely hazardous products such as Class A explosives, radioactives, lethal gases, and infectious etiological (disease-carrying) agents. Due to the inherent physical and chemical properties of the hazardous materials which are proposed for handling at the ICTF and the proposed segregation of these materials in an area which is isolated from ICTF work personnel and adjacent residential areas, the potential impacts associated with the accidental release of these hazardous materials is considered to have been mitigated to insignificant proportions (See Response Nos. 106-112).

SPT Co. Container Traffic at Los Angeles, 1981

Loads (Full or Partial) of Hazardous Materials as Classified by the U. S. Dept. of Transportation

Item	Loads Handled	Notes
Class A Explosives	None	
Class B Explosives	1	
Large Fireworks	1	
Class C Explosives	383	
Small Arms Ammunition	11	
Small Fireworks	372	
Nonflammable Compressed Gas	36	
Oxygen and Mixtures	3	
Nitrogen and Carbon Dioxide	25	
Gas Filled Fire Extinguishers	8	
Flammable Compressed Gas	33	
Other: Mostly Cigarette Lighters	32	
Flammable Liquids	291	
Various Solvents, Plastic and Detergent Bases	18	
Flash Point Below 20°F	31	Mostly Carbon Bisulfide
Other Flammables	71	Industrial Alcohol, etc.
Household Items, Liquid Cement, Paint, Spirits	171	
Combustible Liquids	46	
Anti-Freeze, Etc.	18	
Lacquer, Paint, Etc.	28	
Flammable Solids	44	
Pyrophoric	5	Phosphorous In Water
Other	2	
Misc.	37	Charcoal Briquettes and Matches
Oxidizers	43	
Poisonous	None	
Potassium Peroxide	6	
Other	37	Mostly Sodium Nitrate

SPT Co. Container Traffic of Hazardous materials Los Angeles, 1981 (Cont.)

Items	Loads Handled	Notes
Organic Peroxides	14	
Poison A	7	
Nitrogen Tetroxide, Etc.	7	Non-Combustible
Poison B	247	
Pesticides, Insecticides	8 9	
Toluene Oiisocyanate	158	Base For Plastic Foam
Irritating Material (Tear Gas)	None	
Etiologic Agent (Infectious)	None	
Radioactive Materials	None	
Corrosive Materials	271	
Cleaning Compounds	117	
Basic, Oxidizer (Bromine)	1	
Basic, Other Alkalines	86	
Acfdic, Batteries	38	
Other Acids	29	
Mixed Loads	38	
1981: TOTAL	1,454	Container Loads of Hazardous materi al

(47) In view of the noise barriers to be installed and the distances involved, noise produced by ICTF construction activity should not be substantially annoying at residential areas in the vicinity of the proposed ICTF. Extended activity during evening hours and weekends may cause considerable annoyance. However, from a practical standpoint, the traditional working hours for union construction workers and construction inspectors are from 7:30 A.M. to 3:30 P.M. If other hours are worked, labor union agreements would have to modified, and overtime paid to the workers and inspectors. There may be occasions when work, such as emergency repair and maintenance, may be conducted prior to and after the normal working hours.

Provisions of the applicable noise ordinances regarding construction noise restrictions should provide adequate protection to adjacent residential areas. Unless the sound attenuation walls pose an access problem, the walls will be constructed in the initial phases of the construction activity.

(48) Noise control measures that may be needed, such as noise barriers and equipment noise specifications, will be considered as part of the detailed engineering of the project. Noise measurements will be taken during the first three months as recommended to verify the effectiveness of the engineering design and its implementation. If necessary, additional feasible mitigation measures will be undertaken.

(49) See Response No. 48

(50) A recent report, "Vibration Analysis For the Proposed Intermodal Container Transfer Facility" (Bolt Beranek and Newman, Inc., 1982), presents an analysis of the vibration impacts generated by the movements of trains at the ICTF and through the associated rail corridors, and also presents measures to reduce the causes of vibration. The following is a summary of the report which is on file and available at the Los Angeles Harbor Department, 425 So. Palos Verdes St., San Pedro, CA., and at the Long Beach Harbor Department, 925 Harbor Plaza, Long Beach, CA..

The analysis considered project-generated vibration impacts on both human comfort and the possibility of damage in. buildings by groundborne vibrations. Both daytime and nighttime -vibrations impact criteria guidelines were formulated by Bolt Beranek and Newman Inc. by using available information provided by the International Organization for Standardization (ISO) and recommendations suggested by the Committee of Hearing, Bioacoustics Biomechanics (CHABA) Working Group 69 which established assessment guidelines requested by the EnvIronmental Protection Agency (EPA).

Vibration level data was collected in the Los Angeles basin for train passages along the Union Pacific and Santa Fe railroad

lines. A weighted mean vibration level was used in this study to predict the vibration environment for the ICTF. The two Southern Pacific rail corridors have jointed rail, which typically results in vibration levels 5 to 10 dB higher than continuously welded rail. 'Thus, for the corridor analysis, a weighted vibration level was used providing a "worst case" analysis. The community impacts for the ICTF and the two Southern Pacific rail corridors were analyzed in the following manner: Vibration levels were estimated at each single family and multifamily dwelling within a 500 foot distance from the ICTF and the rail lines. The impact was then calculated by subtracting the criterion level from the predicted level at the dwelling. When the predicted vibration levels exceed the criterion, a negative impact occurs. The magnitude of the impact was subdivided into four categories based on ISO and CHABA criteria. These were:

Predicted Vibration Level Excess over Criteria	Community Impact
1. 0 to 6 dB	Low Negative Response Barely perceptible (1% - 5% complaint level)
2. 6 to 12 dB	Increased Negative Response (6% - 12% complaint level)
3. 12 to 18 dB	Significant Negative Response (12% - 20% complaint level)
4. 18 dB and over	At least 20% bf the population annoyed.

For the Wilmington and San Pedro corridors, the number of single family and multifamily structures with current or projected vibration 'levels in excess of vibration criteria levels were determined. The analysis was conducted for existing rail operations, and for projected ICTF operations for Phase I - 1990, Phase II - 1995, and Phase III - 2000.

The results of the analysis of the impacts of vibration are noted: First, vibration levels are never expected to exceed criteria levels by more than 11 dB; thus no significant negative response would be expected. Second, no impact for either existing or future conditions is expected along the San Pedro branch. This is due primarily to the low speed of travel on this route, and the distance from the track to the community. Third, for daytime and particularly for nighttime periods, some impact already occurs along the Wilmington branch. The total number of homes with expected vibration levels in excess of criteria will approximately double by the 2000, as compared to existing conditions. However, most of the homes lie in the "Low Negative Response" category. By 2000, at night, approximately 20% of the homes along the Wilmington branch will experience vibration levels in the second category, "Increased Negative Response".

The only vibration sensitive area in the vicinity of the ICTF site is a single family residential area to the northeast of the site and east of Hesperian Avenue. This area is 90 feet from the eastern runaround track at the *closest* location, and about 115 feet from the closest working track.

For the. Hesperian Avenue community, the analysis indicates that no impact wilt occur due to ICTF rail operations. This conclusion is a result of the low speed of travel of the locomotives on the runaround track and the unit trains on the working tracks, and the use of continuously welded rails (CWR) on these tracks.

The following major conclusions resulted from the analyses described in the report:

1. No vibration impacts is expected to occur in residential areas adjoining the ICTF site, due to ICTF rail operations.

2. No vibration impact is expected to occur along the San Pedro branch, due to either current rail operations or the addition of ICTF trains.

3. Along the Wilmington Branch, existing vi bration levels exceed criteria, and are expected to increasingly exceed criteria through the various phases of ICTF development. The primary time of impact would be during nighttime hours. The number of residences which will be exposed to vibration levels in excess of criteria is expected to double from now to the year 2000. However, most of these homes would lie in the lowest impact category, for which vibration levels would be barely perceptible. About 20% of the residences will experience vibration levels at night, by the year 2000, which would be categorized as a more moderate impact. None of the expected future impact falls in the "Significant Negative Response" category.

The suggested mitigations to reduce Ground vibration (page 3-54 of the draft EIR), can be further amplified by information discussed in the Bolt Beranek and Newman Inc. (1982) report:

1. Since the interaction of the wheels and rails is responsible for the vibration energy generated, any method which reduces the interaction forces should result in a reduced vibration environment. Wheel raft -roughness can be controlled by grinding rails and eliminating wheel flats. In that context continuously welded rails (CWR) are preferred over jointed rails since they avoid the impact at the rail joints. A 5 to 10 dB reduction can be expected by welding the rails and eliminating wheel flats. Use of CWR along the Wilmington Branch would virtually eliminate the current and expected vibration impact.

Through future maintenance operations and the reworking of the Wilmington Branch by the SPT Co., CWR is expected to replace the existing track system. Also, new tracks associated with the ICTF yard will be of CWR construction.

2. The magnitude of groundborne vibration doubles for each doubling of train speed. Therefore, a reduction in the average speed can result in a significant reduction of the vibration levels experienced at nearby structures. A reduction of the average speed from 50 mph to 25 mph may result in up to 6 dB lower vibration levels. Similarly, sizable reductions will be obtained by slowing trains from the expected 25 mph to 20 or 15 mph currently experienced in some portions of the corridor.

   Due to the operational constraints and safety measures within the proposed facility, train movements will be 15 mph or less at the ICTF. To the extent feasible, the locomotives will use the westerly run around track during nighttime hours.

3. A decrease in fastener stiffness and an increase in rail mass usually results in a reduced force input into the trackbed and therefore a reduced groundborne vibration environment. The ballast and tie fastener system used by most railroads may be improved by various resilient tie systems or by supporting the rail trackbed on piles extending down to bedrock. Some more exotic designs utilized in modern subway systems include floating slab trackbeds supported by resilient pads.

   The SPT Co. will install a heavier ballast and subballast system for rail support at of the ICTF site in the vicinity of the Hesperian Avenue residential area to further reduce impacts to adjacent areas.

(51) The air quality impacts upon the adjacent residential areas due to truck, rail, and construction emissions are anticipated to be minima? because of the reduced time these carriers will be on the ICTF site. An air quality computer simulation mode? which assesses the impact of the on-site air pollutants, Nitrogen Oxides, Carbon Monoxides, Hydrocarbons, Sulphur Oxides, and Total Suspended Particulates, upon the adjacent Long Beach residents was prepared. This study calculates pollutant emissions for the initial operating level in 1983 and far the final projected level in the year 2000. A copy of the study is available for review and is on file at the Los Angeles Harbor Department, Environmental Management Division, 425 S. Palos Verdes Street, San Pedro, and at the Long Beach Harbor Department, Port Planning Division, 925 Harbor Plaza, Long Beach.

The emissions projected by the mode? were compared with California Ambient Air Quality Standards (see Table A-10 of the Draft EIR). These standards are more restrictive than Federal standards and are designed to protect the health and welfare of people in the State.

The one-hour standard was used which is the most restrictive of the California standards.

Comparison of the modeled project emissions to the California standard indicates that neither the Federal or California one-hour standards will be exceeded in any year of project operation. Please note that the emissions calculated with this mode? are usually two to three times greater than actual levels which are anticipated to occur during project operation. This overestimation of air emission levels results from the conservative values used for the parameter estimates in the computer mode? program.

(52) See Response No. 9.

(53) See Response Nos. 18 and 41.

(54) The AQMD does not govern rail emissions, but has jurisdiction over stationary sources of emissions. Train speeds are set by the Interstate Commerce Commission, and by local ordinance. For operational reasons, the railroads adjust train speeds to fit local conditions. Also see Response Nos. 23 and 51.

(55) As shown in the Air Quality section (Section 3.1) of the Draft EIR, the ICTF project wit? have a beneficial impact to the South Coast Air Basin. The use of rail instead of truck transport for container movement will produce a substantial reduction in truck-miles-traveled and fuel consumed. These savings will produce significant net reductions in a?? existing primary air pollutant categories. Also see Response No. 51.

(56) A discussion in the Draft EIR of vibration caused by loaded coal train movements is not warranted, since coal trains will travel on a different rail corridor than. ICTF container trains.

(57) The hazardous materials which will be transported in containers at the ICTF will be packaged and transported in conformance with the established criteria of the U. S. Department of Transportation. These criteria do not allow the transport of hazardous materials which have critically low heat sensitivity in container units. The materials proposed for container handling will not be adversely affected by 45 degree Farenheit variations in temperature (See Response No. 46).

The physical? and chemical nature of these materials is such that the probability of toxic gas release or explosion is low. Mitigation measures will be incorporated into the project to reduce the potential impacts of handling hazardous materials (See Response Nos. 106-112).

(58) The figure which was submitted is not the result of sound testing made by the Harbor Department. As stated on the figure the reference source was an EPA report. The figures and tables presented in the Draft EIR were part of a noise assessment study

which was conducted specifically for the ICTF site and along the Southern Pacific rail corridors that would be used for the ICTF unit trains. As stated in the Draft EIR, a copy of the noise study document, "Noise Assessment Study for the Intermodal Container Transfer Facility" by J. J. Van Houten and Associates, Inc. is avail able for review at the Los Angeles Harbor Department, Environmental Management Division, and the Long Beach Harbor Department, Port Planning Division.

(59) The Union Pacific tracks which run adjacent to Windward Village Mobile Park will not be used to carry ICTF trains.

(60) The ICTF will not be a rail classification yard. The majority of the site will be paved, and the ICTF will be provided with security fencing, lighting, and guarded controlted access. Policing functions of the ICTF will be a responsibility of the LAHD Port Wardens, who are paid by Port revenue and not the City's general revenue fund.

(61) During periods of peak shipping activity eg. several container ships arrive and discharge containers in a confined time period, it may become necessary for the ICTF to operate six or seven days each week. Although this operational scenario is not projected on a yearly basis, the actual operational period is impossible to predict accurately for a year's period. Therefore, emissions were calculated on a worst case basis, that is 365 days/year operation. Calculation of emissions based upon a 260 days/year would reduce emissions as projected by approximately 28%.

(62) The animal life observed at the site are primarily -rodents, domestic animals, reptiles and birds which do not possess unique habitat requirements. There is adjacent habitat available for them to recolonize. Furthermore, many of these animals particularly the birds may use this area in a transient manner for foraging, resting, etc. Undoubtedly some of the terrestrial animals will be lost during the construction activity.

(63) The use of carpooling, ride-sharing and busing plans was discussed as a potential mitigation feature that could reduce project air emissions (see pages 3-15 and 3-16 of the Draft EIR) and energy consumption (see pages 3-120 and 3-121 of the Draft EIR). These would also reduce traffic impacts. However, as also stated in the Draft EIR the ICTF will not be a labor-intensive operation, and there will not be a large commuters' pool from which to form an extensive plan. A conservative employee carpooling factor of 1.2 employees per vehicle was used for the impact analyses.

(64) See Response No. 29.

(65) See Response No. 25.

(66) The figure was mislabeled (See Response No. 29). The freeway terminus will not be split.

(67) The proposed LA-LB light rail transit project was discussed on pages 3-109 and 3-110 of the Draft EIR.

(68) The Southern Pacific Transportation Company will operate the ICTF under a long-term lease agreement. The ICTF will be serviced exclusively by SPT Co. by two branch lines that connect the Ports' area to its main line track.

(69) As shown in the Errata section, the phrase has been added.

(70) The Ports are aware of the restrictions placed on the use of Southern California Edison Company's power transmission line right-of-way for storage of movable cargo. These restrictions will be used as planning and design criteria when the Edison property is required for the remote storage of containers.

(71) See Response No. 25.

(72) The clarification as stated is shown in the Errata Section.

(73) The Ports are aware of the problems associated with displacing tenants. The Port of Long Beach is presently discussing with Southern California Edison Company the issue of resolving impacts to displaced tenants.

(74) See Response No. 25.

(75) The Southern Pacific Transportation Company has a policy of cooperating with the Public Utilities Commission in mitigating hazards at grade crossings, including installation of crossing protection devices and closing of crossings. SPT Co. has agreed to work closely with the PUC in resolving potential problems at affected grade crossings.

SPT co. is conducting design studies in cooperation with traffic engineering personnel from Los Angeles County and the cities of Los Angeles and Carson to develop mitigation measures for the potential increases in traffic delays caused by ICTF trains at certain at-grade crossings (See Response No. 4).

(76) A copy of the letter dated June 18, 1982 is attached following the July 19, 1982 letter from the City of Los Angeles, Department of Public Works (in the section "Letters of Comment"). For response to these concerns, see Response No. 25.

(77) See Response No. 25.

(78) The contents of Draft EIR have been reviewed again by staffs of both Ports and the SPT Co. Based upon our review and the comments received from the public review of the Draft EIR, the only potential impact areas that required further analyses were air quality and vibration impacts to residential areas adjacent to the ICTF site. These studies have been completed and are incorporated into the

Final EIR. Clarification has been provided in the Final EIR on the extent and nature of hazardous materials that could be handled at the ICTF.

(79) Adjacent owners/operators of industrial/commercial property affected by the proposed ICTF project and governmental jurisdictions that issue ministerial and discretionary approvals for the project were sent copies of the Notices of Preparation of the Draft EIR and copies of the Draft EIR. See Response No. 13.

(80) The Draft EIR addresses cumulative impacts, in particular the proposed coal terminals. Cumulative impacts of the ICTF and coal train activity are discussed in Sections 3.4.4.2 and 3.8.4.2 of the Draft EIR.

(81) Impacts identified under "Risk of Upset" in the Initial Study are discussed in Section 3.6 "Safety" of the Draft EIR.

(82) In the Draft EIR, some of the mitigations are proposed as part of the project; however, some mitigation measures are beyond the scope of the project or those that may be developed in cooperation with the jurisdictional agencies when the engineering details of the project are finalized. These mitigations are available measures that, if implemented, would further reduce the potential environmental impacts of the project. A summary of the potential adverse impacts of the project and consideration of mitigation measures is presented in the Executive Summary of this Final EIR.

(83) An analysis of alternatives was presented in Section 5 of the Draft EIR. Studies, including comprehensive analysis of truck and rail access, facility layout, and other site locations, showed the preferred project plan to be the environmentally superior alternative.

(84) Long-term implications of the project are described in Section 4. The present commitment of the project site to the proposed ICTF use would not preclude future alternative uses of the site.

(85) Table A-11 on Page 6-21, shows the maximum air pollutant concentration averages and violations 'of the' State standards recorded in the Long Beach area for the year 1980. As indicated in the Draft EIR, the Long Beach station is the closest monitoring station to the project site, and data *recorded* for this station is considered most representative of the project area. An air quality computer simulation model study was conducted to assess the potential impacts to residents adjacent to the proposed ICTF site (See Response No. 51).

(86) There are no SCAQMD permits anticipated for any of the project operational equipment. Bridge cranes and yard hostlers utilize internal combustion engines which have less than 500 brake horsepower ratings. SCAQMD Rule 219 exempts mobile equipment having piston type internal combustion engines with a rating of 500 brake

horsepower or less. Conventional yard hostlers and bridge cranes have diesel engines of about 160-200 horsepower.

(87) See Response No. 51.

(88) The chart provided on the following page compares the net decrease in truck emissions brought about by the ICTF project and the increased emissions brought about by increased rail activity. A comparison is made for each contaminant produced. It can easily be seen that the benefits to air quality brought about by a reduction in truck travel clearly outweighs the increase in emissions from rails in all contaminant categories except hydrocarbons. substantial benefits to air quality are seen to occur for the contaminants carbon monoxide and nitrous oxides.

(89) The employee carpooling factor assumed in Table 10, Section 3, page 14 of the Draft EIR is a conservative estimate and is generally considered attainable. This employee carpooling factor has been accepted by SCAQMD as a reasonable estimate of attainable carpooling for many previous EIR's (See Response No. 63).

(90) Paving the ground surface at the project site will result in the loss of freshwater recharge to underground water supplies. Assuming that all of the 260 acres are paved, there will be a maximum loss of about 85 million gallons per year (based on average rainfall of 12.2 inches per year and assuming all rainfall at the proposed site currently recharges the ground water supplies). The 85 million gallons per year of runoff water from the site, removed from groundwater recharge, is not significant. The water table in the Harbor area is contaminated by seawater intrusion and is not fit for consumption. Input of fresh water to the underground supplies in this area is not critical to protect the public drinking water supply.

(91) Sheet flow from the project site will be typical of pavement runoff throughout the basin. Sheet flow is expected to be clean and should have little effect on water quality within the Dominguez Channel. Stored containers with hazardous material will be segregated from the rest of the site and will be held in a special containment area. Runoff from this area will be isolated and will not reach the Dominguez Channel. All containers will be inspected at entry and leaking containers will not be accepted.

The California Regional Water Quality Control Board commented that in general the Draft EIR adequately addressed their concerns.

(92) See Response No. 50.

(93) When required, the City of Carson applies the Los Angeles County Noise Ordinance (The City of Carson does not have working noise ordinance, as such). The noise issuing from the ICTF will have to meet the provisions of applicable noise ordinances. The use of 65dBA as the noise standard is consistent with the noise ordinances

MOBILE EMISSIONS

YEAR	DECREASED TRUCK EMISSIONS* (lbs/day					INCREASED RAIL EMISSIONS (lbs/day				
	CO	HC	NO_x	SO_x	TSP	CO	HC	NO_x	SO_x	TSP
1983	360	52	1170	98	69	171	94	448	54	24
1984	399	53	1291	109	76	171	94	448	54	24
1985	415	56	1322	121	86	171	94	448	54	24
1986	429	58	1349	134	94	258	141	672	81	36
1987	485	65	1376	149	106	258	141	672	81	36
1988	546	74	1388	166	116	258	141	672	81	36
1989	606	74	1430	184	129	258	141	672	81	36
1990	672	76	1453	204	143	344	189	897	110	48
1991	726	82	1569	221	155	344	189	897	110	48
1992	786	88	1700	238	166	344	189	897	110	48
1993	847	94	1830	258	182	344	189	897	110	48
1994	914	103	1976	274	197	429	236	1120	136	60
1995	990	111	2139	301	211	429	236	1120	136	60
1996	1067	120	2307	325	226	429	236	1120	136	60
1997	1156	129	2490	350	244	514	284	1346	164	72
1998	1245	136	2688	377	265	514	284	1346	164	72
1999	1308	144	2847	399	276	514	284	1346	164	72
2000	1452	163	3136	442	309	602	330	1569	191	84

* These emissions represent a net benefit to air quality.

The truck emissions were based upon the net reduction in truck-miles-traveled (Existing condition with the trucks traveling to the downtown railyards vs. to the ICTF).

and elements of affected cities and of L.A. County (see Table 14 on Page 3-31 of the Draft EIR).

If a violation of any applicable noise ordinance occurs, the ICTF project would be required to correct the situation.

(94) CNEL is a well defined descriptor of noise exposure (for example refer to the U.S. Environmental Protection Agency's Levels Document 550/9-79-100). "CNEL for nighttime" has no validity in noise measurement. The CNEL (also described on page 3-29 of the EIR) rating represents an average noise level determined for a 24-hour period, with different weighting factors for noise exposures occurring during. the day (7am-7pm), evening (7pm-10pm) and nighttime (10pm-7am) hours. Essentially, the CNEL is an average sound level for a 24-hour period, with special corrections of 5 and 10 dB for evening and nighttime hours, respectively. As a result, the CNEL accounts for the increased disturbances of evening and nighttime exposures. With regard to SEL (sound exposure level) which applies to the. single event pass-bys of trains, it is a key element in the evaluation of the noise exposure leading to an estimate of CNEL. The concern for single event exposures is addressed as part of the noise ordinance provisions of the City ordinance which would be applied.

(95) Table 15, page 3-34, is complete and fulfills its purpose giving a data summary which includes the locations of field study areas, site jurisdiction, site land use, the sound recording site distance from primary noise sources, and the duration of the noise measurement. The measurement period specified in the relevant City and County noise ordinances is one-hour. Where considered appropriate, 24-hour and longer periods of noise level measurements were obtained.

SEL values are discussed on page 3-29 of the Draft EIR. SEL values, Table 26 (page 3-35 of the Draft EIR), are used to assess the CNEL of events such as train pass-by which occur during various periods of the day and/or night.

For assessment of the impact of noise generated by the project, ordinance standards were considered, and a CNEL above 65 db(A) was considered significant (page 3-43 of the Draft EIR). Although not described in the City or County noise ordinance, CNEL is a land use noise exposure descriptor. The projected CNEL values were estimated by using projections of container train movements.

(96) The potential noise impact of the proposed ICTF project was assessed by comparing the expected sound levels and noise exposures (CNEL) with the guidelines identified and addressed on page 3-43 of the Draft EIR. By presenting the existing and projected CNEL values in the Draft EIR, any violations (or significant impacts) are illustrated as defined in the assessment guidelines. At present, the increase in sound levels due to the project are unavoidable but will be eliminated or lessened by prescribed mitigation measures. The impact of increased CNEL and hourly sound levels associated with

the construction and operations of the ICTF is addressed on pages 3-43 through 3-52 in the Draft EIR. Operational impacts are described using a "worst case" scenario which is the projected noise levels at the year 2000.

(97) A number of exhibits in the Draft EIR illustrates or discusses railroad road related noise:

Figure 33a through 33d provide Existing, Without ICTF (year 2000), and with ICTF (year 2000) noise exposures to adjacent land areas considering railroad, vehicular, and operational activities. Again the assessment for impacts was based on CNEL values which consider both day and night noise exposures (see Response Nos. 94 and 96). Attenuation of project sounds is discussed in regard to mitigation measures on pages 3-53 through 3-58 of the Draft EIR.

(98) The following cumulative impacts are discussed in the Draft EIR:

1. Long Beach coal transport project on the Union Pacific Railroad tracks just east of the proposed ICTF project (page 3-51).

2. Increased traffic on the Route 47 Freeway (pages‘ 3-45; Table 19, page 3-50; and pages 3-45).

3. Increased rail movements on the SPT Co. branch lines, with and without the project as was discussed in Response No. 97.

At the time the Noise Assessment Study was prepared, a definitive light rail scenario was not available. The Los Angeles County Transportation Commission and Caltrans had conducted preliminary feasibility studies for a light rail project. These studies included evaluations of alternative routes, other rapid transit modes, and alternative operating characteristics. Without the availability of more definitive and detailed information, quantification of cumulative impacts could not be made.

(99) It was not intended that the use of containers would replace the installation of noise barriers. However, the stacked containers will assist in attenuating noise and, as such, help to mitigate increased noise levels to adjacent areas.

(100) The mitigation methods in the Draft EIR were recommended. to reduce noise exposure levels. Several noise mitigation measur es can be better defined at this time. By following union authorized construction time schedules (as discussed in Response No. 47), construction noise can be limited to daytime hours; also, to the extent possible, sound attenuation walls will be constructed during the initial phases of the construction activities. The sound barrier walls will be positioned along the northeastern boundary of the facility as shown in the Oraft EIR (page 3-55). Noise measurements will be taken during the first three months as recommended to verify the effectiveness of engineering design (see Response No. 48).

Bridge crane noise reduction can be achieved by enclosing the diesel/electric power plant and/or using residential class silencers. As indicated in Response No. 49, this type of mitigation will be analyzed by the SPT Co; and if these measures prove effective and are required to comply with the applicable noise ordinances, they will be installed. Noise emissions from locomotives and moving rail cars operated by SPT Co. are subject to federal government regulation. The Environmental Protection Agency standards which are enforced by the Federal Railroad Administration are found in Title 40 of the Code of Federal Regulations, Chapter I, Part 201, as amended January 4, 1980. Each applicable section is summarized below:

Section 20.11 contains the standard for locomotive operation under stationary condition. A single locomotive at idle must not produce A-weighted sound levels in excess of 73 dBA at a distance of 100 feet, if it was manufactured on or before December 31, 1979. For locomotives manufactured after this date, the sound level must not exceed 70 dBA at a distance of 100 feet.

Section 201.12 contains the standard for locomotive operation under moving condition. This Environmental Protection Agency standard limits emissions from locomotives manufactured on or before December 31, 1979, to 96 dBA at a distance of 100 feet. For locomotives manufactured after this date, the noise emission at 100 feet must not exceed 90 dBA.

Section 201.13 regulates noise emissions from moving rail cars. For speeds at or below 45 miles per hour, sound levels from any rail car or combination of rail cars must not exceed 88 dBA at a distance of 100 feet. At speeds above 45 MPH, sound levels must not exceed 93 dBA at 100 feet.

(101) Definitive illumination features of the ICTF will not be available until the design phase of the lighting needs is initiated. Detailed concern will be given to the impact of light/glare emissions upon adjacent residential areas. A decisive energy conservation plan will be incorporated into the lighting design which should decrease any unnecessary light and glare while ensuring proper illumination for security, safety, maintenance, and operation of the ICTF. Basic design criteria for a good energy conservation plan is to have the proposed lighting provide the minimum effective foot-candle power necessary for the illumination task. This, coupled with what is stated in the Draft EIR about minimizing unwanted light and glare by focusing lamps and by using hoods and shades on lamps, will decrease the impact of light and glare.

(102) The City of Carson has reviewed the Notice of Preparation and Draft EIR for this project, and has met with Port representatives to discuss probable impacts to the City of Carson. The City of Carson has not expressed concern about the safety aspects from the implementation of this project. However, hazardous material safety aspects, will be finalized by SPT Co. prior to the operation of the ICTF.

(103) The specific location and design of the hazardous material segregation area are discussed in Section 3.6.5.2. of the Draft EIR.

(104) Section 3.6.5.1 of the EIR indicates that the fire protection equipment anticipated for use in this project may include both fixed and portable combination water foam (AFFF) equipment and portable carbon dioxide dispensers. Firefighting equipment will be dictated by the City of Los Angeles Fire Department to assure adequate protection/prevention measures.

(105) See Response No. 45.

(106) The segregation of stored containers carrying hazardous materials into a specific area which includes firefighting and protective equipment coupled with the nature of hazardous materials anticipated for handling are expected to mitigate any potential accident which could foreseeably occur at the ICTF. Specific planning measures which include general evacuation considerations will be prepared by SPT co. in conjunction with the Fire Department prior to the operation of the ICTF.

(107) Divisions S and 17 of the Building and Safety Code of the City of Los Angeles specifically refer to the storage of hazardous materials within building structures. Storage of hazardous materials in the ICTF will be in an open air area which is segregated from operational facilities within the ICTF and adjacent residential areas.

(108) The proposed fire hydrant locations are shown in Figure 39 of the Draft EIR. Detailed plot plans indicating hydrant locations will be submitted to the Fire Department prior to issuance of any permits.

(109) See Response Nos. 45, 57, 104, 106, 111, and 112.

(110) In the event of an accidental release of hazardous materials and fire, the isolation of these materials in the segregated storage area is thought to be sufficient to prevent any impact to the Macmillan Ring-Free Oil Co. or adjacent residential areas (See Response No. 57).

(111) The specific mitigations described in the Draft EIR which include the development,of a segregated area for stored containers carrying hazardous materials, placement of hydrants throughout the facility, building sprinklers, and general placement of fire protection/prevention measures throughout the facility were initially developed and will be finalized in concert with the City of Los Angeles Fire Department planning section. These measures are proposed as an element of project design and are considered feasible. In preliminary meetings with the Fire Department automatic aid or mutual aid agreements between the cities of Los Angeles and Long Beach and the County of Los Angeles have been discussed.

(112) Criteria for the evaluation of emergency conditions would be established by considering the nature of the materials handled and the rate and quantity of release of these materials. These factors will be considered in formulating an emergency response plan for the ICTF which complies with all Federal and State guidelines.

Notification of residents and evacuation procedures, procedures for coordination and communication with local residents and public services such as fire, police, schools etc., will be generated as a part of the emergency response plan as required by the State of California Health and Safety Code, Title 8.

This plan will be developed and approved prior to ICTF operation.

(113) See Response No. 9.

(114) Import Dealers Service Corporation will, at no cost, be provided proper access to their site that meets with their approval.

Macmillan Ring-Free Oil Co. has plans for a refinery expansion project on their leased 15.1-acre land parcel which is required for the ICTF. The refinery expansion project has been under planning and preparation for eleven years. A preliminary appraisal of the property will be undertaken. The appraisal will need to examine the expense associated with obtaining permits for the refinery expansion. The value of these permits, as they are accrued to the land values, will decrease as permits near their expiration date. While the permits do exist, the deterioration in petroleum price levels may have undermined the viability of the Macmillan project to the point where near term construction becomes, an open question.

The lease agreement must be resolved between Macmillan Ring-Free Oil Co. and the Watson Land Co.

(115) See Response No. 9.

(116) See Response No. 9.

(117) As discussed in the Draft EIR, there will be disruption to the surface street traffic circulation during the construction activity for the ICTF. However, the impact will be temporary and will primarily result in some motorist inconvenience. The major components of the project (rail access, truck access and site improvements) will be constructed in stages to minimize the disruption to vehicular traffic flow. Through traffic will be provided on all affected streets and freeway on/off ramps during construction. A thorough description of the construction activities was presented in Section 1.3 of the Draft EIR. The ICTF construction activities will be coordinated with local jurisdictional agencies to ensure minimal disruption.

As such, the potential traffic impacts from construction were determined to be insignificant, and no further analyses were conducted. Mitigation measures described in Section 3.8.5 of the Draft EIR will be incorporated into the project's construction engineering and scheduling features.

(130) The California Environmental Quality Act (CEQA) and the State CEQA Guidelines (as amended on 2-6-82), and the Los Angeles City CEQA Guidelines (as revised on 1-27-81) do not contain requirements for the structure and content for the Table of Contents. Article VI Section 2f of the L.A. City CEQA Guidelines merely states that "The EIR shall also contain a table of contents or an index."

A discussion of land use and project-related changes in land use is presented in Section 2 of the Draft EIR under "Relationship to Federal, State, and Local Land Use Plans, Policies, or Controls."

(131) As required under Article 9, Section 15140 (a) of the State CEQA Guidelines, the elements are separated into distinct sections with tabs and page numbers indicating where the elements are discussed in the EIR (this is provided in the Table of Contents). Furthermore, specific sections, subsections and topics are given a title and systematic enumeration to provide clarity and to facilitate location in the EIR.

Because topics are overlapping, they are discussed in more than one place in the EIR. The brief statement of rail access given on page 1-4 was included to clarify the precise location and boundary of the proposed project site and the affected rail corridors. The description of rail access in subsection 1.3.2.1.1, Rail Access, provided information (text and figures) on how the rail access was to be constructed. This subsection was clearly enumerated under subsection 1.3.2, Construction Characteristics, and cross-reference to the statement given on page l-4 was not necessary.

(132) Article 9, Section 15140(b) of the State CEQA Guidelines does not require that all relevant issues be addressed in the Executive Summary. Rather, it states that the major conclusions and areas of controversy be stressed in the summary. Because comments received during the public review of the Draft EIR indicated that potential vibration impacts of the project were an area of concern not previously addressed in the Draft EIR, vibration analyses were conducted for the ICTF operations at the site and along the affected rail corridors (See Response No. SO). The issue of vibration is addressed in the revised Executive Summary provided in this Final EIR.

The Executive Summary in this Final EIR includes a statement of why the proposed project was chosen among the various alternatives. A detailed description of the alternatives f including the preferred alternative is found in Section 5.0, "Alternatives" the Draft EIR.

(133) As required by Article 9, Section 15141(c) a discussion of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals and supporting public service facilities are presented in the Draft EIR. Subsection 1.3 of the Draft EIR (pages 1-7 to l-32) describes the project's planning and construction characteristics. The project's

demand (economic) and operational characteristics are described in subsection 1.4 (pages 1-32 to l-38), and subsection 1.5 (page 1-39) A general description of the project s environmental characteristics are included in the above-mentioned subsections with a thorough discussion of the potential environmental impacts of project presented in Section 3.0 of the Draft EIR.

As stated previously in Response No. 9, Section 15012(b) of the State CEQA Guidelines does not require disclosure of economic information. The economic information may be included or presented in whatever form the agency desires.

(134) Article 9, Section 15142(a) of the State CEQA Guidelines states "Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region. The local and regional setting relative to potentially impactelf environmental resources are given in the Draft EIR under Section on 3.0, Environmental Setting, Impact and Mitigation, with a summary page preceding the discussion each potentially affected environmental resource. The discussion of existing land use and project-related changes to land use was included in Section 2.0 along with land use plans to provide clarity and continuity, since this section describes the relationship of the proposed project to applicable land use plans (Port of Los Angeles Master Plan, City of Los Angeles General Plan, and Port of Long Beach Master Plan) and applicable regional plans.

Existing (pre-ICTF project condition) land uses of adjacent land parcels are described by location (Figure 27), owner/tenant, and use. Figure 27 has been modified and identifies an additional adjacent parcel and also shows the present zoning of each parcel. The modified Figure 27 is presented in the Errata section of this Final EIR.

In addition to adjacent land use, the Draft EIR also listed the parcels of property that would be required for each phase of the ICTF development. Each parcel is denoted by approximate acreage, owner, and land use. Figures using aerial' photographs clearly show the location of each of these land parcels.

As such, the Draft EIR adequately describes the current land use and the project-related changes in land use. Secondary impacts of air quality, noise, traffic, etc. to the surrounding areas were discussed in Section 3.0 under the specific environmental resource affected.

(135) The Draft EIR identified related projects including the proposed Ports' coal terminals, proposed Los Angeles-Long Beach Light Rail project, Macmillan Oil Co. liquid bulk expansion project, SCAG's Highway Improvement Program, and the Route 47 extension project. To the extent feasible, cumulative impacts of the ICTF and the related

projects on affected environmental resources (air quality, noise, traffic, etc.) were identified, to the extent possible quantified, and discussed.

(136) Section 5.0 of the Draft EIR describes all reasonable alternatives to the project, including the no project alternative, alternative site locations, direct rail access alternative, and facility (rail access truck access) alternatives. Reasons were provided why the various alternatives were rejected and the preferred alternative selected. The environmental consequences of the "no project alternative" were discussed in Section 5.1 of the Draft EIR. The alternative site locations and facility alternatives would impose, in general, the same impacts to the environment as the preferred plan but would result in additional operational problems and increased costs.

(137) Paving will insignificantly reduce the existing terrestrial habitat and the land available for agricultural/horticultural uses. Some 35 acres of the agricultural land are in Southern California Edison Co. transmission line right-of-way and support low intensity cultivation of row crops, flowers, and backyard garden crops. The existing Southern California Edison tenants are on short-term leases for these interim uses. The additional land currently used for agricultural purposes is on Watson-owned property that is currently under lease to Macmillan Oil Co. The loss of approximately 60 acres of agricultural/horticultural land is not significant.

The loss of terrestrial habitat due to paving will also be insignificant. Much of the proposed project site is vacant or covered with asphalt, gravel or sandy dredged material. The terrestrial and plant communities found at the site are not unique, or endangered and are species that typically inhabit disturbed environments.

The quality and quantity of terrestrial habitat and agricultural land lost from project implementation would result in no significant impact to the enhancement of long-term productivity.

(138) The Initial Study identified numerous areas of impact that might result from the proposed project. The need to' conduct further studies of project-related noise, traffic, utility demand, air emission, and cumulative impacts was identified in the Initial Study.

The "Risk of Upset" and "Potential Health Hazard" are discussed in Section 3.6, Safety, of the Draft EIR.

There is no requirement that a section in the EIR address "Mandatory Findings of Significance." Reference to "Mandatory Findings of Significance" is found in the Initial Study form and is provided to assist the Lead Agency in evaluating whether the project may have a significant effect on the environment. If the project results in a positive response to one or more of the Mandatory

Findings, the project would have a significant environmental impact, and an EIR would have to be prepared.

As provided in the State CEQA Guidelines, Article 9, Section 15140(3), it was intended that the environmental impacts determined in the Initial Study as clearly insignificant would not be discussed further in the EIR, The Notice of Preparation for the Draft EIR stated that the following impact areas were found to be insignificant and would not be discussed in the EIR: recreation, topography and geology (including seismic considerations of the project), habitats and biota (plants and animal life, excluding agricultural crops), and cultural resources. However, a letter of comment was received from the California Department of Fish and Game which determined that the EIR should contain descriptions of the existing flora and fauna, the living aquatic resources within Dominguez Channel and the existing water quality parameters within Dominguez Channel and potential impacts to these. The discussion in the Draft EIR (Section 3.3) which included nonagricultural plant life was in response to California Fish and Game comments.

(139) Additional studies were conducted to assess potential impacts of project-related air emissions and vibration on adjacent residential areas. These impacts and clarification of hazardous material handling and safety have been addressed in the Final EIR. Other potentially significant environmental impacts/issues have been determined to be adequately considered and discussed in the Draft EIR.

(140) See Response Nos. 78 and 139.

(141) See Response No. 82.

(142) For consideration of adjacent residential areas and private ownership/leases, see Response No. 134.

For consideration of concerns/controls of the City of Carson, see Response No. 13.

(143) Numerous analyses for potentially significant impacts of the project were conducted, including a noise impact assessment by J.J. Van Houten & Associates, a traffic impact analysis by Wallen Associates, a grade crossing computer simulation study by Reese-Chambers Systems Consultants, a vibration impact analysis by Bolt Beranek & Newman, and an air quality computer simulation study by WESTEC Services, Inc. In addition, H.M. Scott & Associates/DMJM completed a feasibility study for the ICTF. These studies are on file at the Los Angeles Harbor Department, Environmental Management Division and at the Long Beach Harbor Department, Port Planning Division for public inspection. It is felt that the Draft EIR does provide an objective and realistic assessment of the project characteristics and environmental impacts.

(144) See Response No. 17.

(145) The ICTF will also relieve some of the development pressures on the railyards facilities of the three railroads serving the Southern California area. These existing facilities are operating near capacity, particularly the Los Angeles Transportation Center of the SPT Co. The ICTF will allow, the SPT Co., railyards to operate more efficiently.

(146) See Response No. 25