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IGR/CEQA No. 090109AL, NOP
Intermodal Container Transfer Facility (ICTF)
Vic. LA-103 PM 0.0(LA-47), LA-710 PM 3.014
SCH # 2009011023

February 11, 2009

Mr. Sam Joumblat
Intermodal Container Transfer Facility
925 Harbor Plaza
Long Beach, CA 90802

Dear Mr. Joumblat:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is to decrease the existing facility footprint from 233 acres to 177 acres and to increase the capacity to handle containers at the ICTF from the current annual average of 75,000 to an estimated 1.5 million annual average by modernizing existing equipment and equipment operating methods.

Page 75 of the Initial Study states that the proposed Project is expected to double the cargo containers that move through the ICTF. We realize that this will increase the truck trips on State facilities significantly. All the trucks will be traveling about 4-5 miles starting from the Long Beach and Los Angeles Port to ICTF on SR-710, and SR-103 (SR-47). To assist us in our efforts to evaluate the impacts of this project on State transportation facilities, a traffic study in advance of the DEIR should be prepared. We wish to refer the project's traffic consultant to our traffic study guideline Website:

<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>

and we list here some elements of what we generally are expecting in the traffic study:

1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to State Route 710, 103, possibly alternative State Route on 405 and 110, on/off ramps at SR-710/W Willow St. and NB SR-405/S Alameda St. and all on/off ramps for trucks expected to travel to/from the both ports. We have concern about queuing of vehicles using off-ramps back into mainline through lanes. We recommend the Lead Agency to determine whether project-related plus cumulative traffic is expected to cause long queues on and off-ramps and the mitigation may need to be proposed appropriately.

2. Consistency of project travel modeling with other regional and local modeling forecasts and with travel data. We may use indices to check results. Differences or inconsistencies must be thoroughly explained.
3. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. This should include freeways, interchanges, and intersections, and all HOV facilities. Interchange Level of Service should be specified (HCM2000 method requested). Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions would include build-out of all projects (see next item) and any plan-horizon years.
4. Inclusion of all appropriate traffic volumes. Analysis should include traffic from the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments. That is, include: existing + project + other projects + other growth.
5. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These mitigation discussions should include, but not be limited to, the following:
 - Description of Transportation Infrastructure Improvements
 - **Financial Costs, Funding Sources and Financing**
 - Sequence and Scheduling Considerations
 - Implementation Responsibilities, Controls, and Monitoring

Any mitigation involving transit, or Transportation Demand Management (TDM) should be justified and the results conservatively estimated. Improvements involving dedication of land or physical construction may be favorably considered.

6. Specification of realistic mitigation measures. Caltrans may accept fair share contributions toward pre-established or future improvements on the State Highway System. Please use the following ratio when estimating project equitable share responsibility: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guidelines). We note for purposes of determining project share of costs, the number of trips from the project on each traveling segment or element is estimated in the context of forecasted traffic volumes which include build-out of all approved and not yet approved projects, and other sources of growth. Analytical methods such as select-zone travel forecast modeling might be used.

The Department as commenting agency under CEQA has jurisdiction superceding that of Metro in identifying the freeway analysis needed for this project. Caltrans is responsible for obtaining measures that will off-set project vehicle trip generation that worsens Caltrans facilities and hence, it does not adhere to the Congestion Management Plan guide of 150 or more vehicle trips added before freeway analysis is needed. Los Angeles County's Congestion Management Program in acknowledging the Department's role, stipulates that Caltrans must be consulted to identify specific

locations to be analyzed on the State Highway System. Therefore State Route(s) mentioned in item #1 and its facilities should be analyzed per the Department's Traffic Impact Study Guidelines. To help us to determine the appropriate scope, we request that a select zone model run is performed.

7. During your truck impact analysis, we recommend the following items related to truck traffic be evaluated /considered, where applicable:
- The increased potential for pavement and base sections break-down by heavy trucks.
 - Truck vehicle access onto the highway may be slower than other vehicle due to the additional weight.
 - Turning radii may need to be larger to prevent trucks from crossing the centerline.
 - Shoulder widths may need to be increased.
 - Sight distance may influence the need for curve corrections.
 - Cargo spills need to be cleaned up expeditiously to prevent accidents.
 - Truck routes need to avoid areas with frequent pedestrian use, such as schools.
 - Signal timing and placement as trucks may have greater difficulty stopping.
 - Emission systems on older trucks may not meet new air quality standards.

In the spirit of mutual cooperation, we would like to invite the lead agency and the consultant to the Caltrans office to discuss project generated traffic impacts on the State facilities and mitigation measures that could alleviate traffic congestion in the future. This would help the consultant in preparing the traffic study that would show and mitigate impacts in the State transportation system.

We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the DEIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned.

If you have any questions, please feel free to contact me at (213) 897-6696 or Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 090109AL.

Sincerely,



ELMER ALVAREZ
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse