



Date: January 9, 2012
To: Patrick H. West, City Manager
From: Amy J. Bodek, Director of Development Services
For: Honorable Mayor and Members of the City Council
Subject: Draft Comment Letter Re: Southern California International Gateway Facility

On December 6, 2011, the City Council directed staff to prepare a communication from the City Manager to the Los Angeles Harbor Department on the proposed Southern California International Gateway facility (SCIG) by January 17, 2012, in order to provide comments prior to the close of the public comment period for the Draft EIR on February 1, 2012. In addition, the City Council directed staff to obtain more information from the Port of Los Angeles on the following topical issues related to the SCIG project:

- Further explanation of the EIR conclusion that zero emissions technologies are not yet feasible.
- Further analysis of other potential on dock locations, as well as finding of alternative locations, that are not near residential areas or in proximity to schools.
- Further information about any job losses from relocated tenants or property owners.
- Provide further explanation and data on light and noise impact analysis.
- Explanation of the assumptions and selection of the DEIR baseline.

Staff has prepared the following technical comment letter to the Los Angeles Harbor Department. The letter addresses the City Council's issues and other technical concerns regarding the preparation of the Draft EIR. It is the intention of staff for the letter to be submitted by the close of the public comment period on February 1, 2012.

If you have any concerns, comments or suggestions regarding this draft comment letter, please provide them to Amy Bodek, Director of Development Services, as soon as possible, but no later than January 23 so that staff may finalize the letter. For more information, contact Amy Bodek at extension 86428. Thank you.

AJB
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Attachment

CC: Suzanne Frick, Assistant City Manager
Reginald I. Harrison, Deputy City Manager
Robert ZurSchmiede, Deputy Director of Development
Derek Burnham, Planning Administrator



CITY OF LONG BEACH

Office of the City Manager

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January 18, 2012

Christopher Cannon
Director of Environmental Management
Port of Los Angeles
425 S. Palos Verdes Street
San Pedro, CA 90731

RE: Comments on Southern California International Gateway (SCIG) Draft Environmental Impact Report (Draft EIR)

In reviewing the key environmental challenges facing the City of Long Beach in the new millennium, the growth and expansion of port operations at the Ports of Long Beach and Los Angeles (Ports) are at the top of the list for City planners and policy makers alike. Associated with the growth of these Ports are the expansion of the I-710 Long Beach Freeway, changes to the I-49 Terminal Island Freeway, replacement of the Gerald Desmond Bridge, a proposal to expand the Intermodal Container Transfer Facility (ICTF) directly north of the SCIG project, improvements to Pier S and Pier B, and the proposed new near-dock intermodal rail facility - the SCIG Project.

Balancing the needs of the Ports as they continue to grow, with those of the neighboring communities, is imperative. We believe that working together will yield the best outcomes for all concerned parties.

Overall, City staff are quite disappointed with the underwhelming analytical efforts and false conclusions presented in the SCIG Draft EIR and we believe that the document falls short of meeting California Environmental Quality Act (CEQA) requirements for revealing and evaluating the probable environmental impacts of this new, extremely large, intermodal rail facility, which would be sited adjacent to many sensitive receptors and thousands of residents living nearby. Further, we contend that as this evaluation is flawed and the environmental impacts of this facility on its neighbors are greatly underestimated, the mitigations proposed are found to be inadequate as well. Additionally, we note that the Draft EIR lacks explanation and supporting data for many of the calculations found throughout the document, notably in chapters 3.2 on Air Quality and in 3.9 on Noise, thus making it hard to decipher whether or not the analysis was performed correctly and actually led to the proper conclusions.

Herein, we will address City staff's concerns with the Proposed SCIG Project as presented in the Draft EIR.

Reconfigured Project Boundaries

Since the Notice of Preparation (NOP) in 2005, the project area boundaries have changed. Figures 2-1, 2-2, 2-3a and 2-3b show that now the "project site" only consists of the SCIG rail

yard and the north and south rail lead tracks servicing the site. The majority of the Long Beach portion, including the Southern California Edison property, is now outside of the project area boundaries on "relocation sites." In addition, the Union Pacific (UP) rail tracks located east of the SCE property/west of the Terminal Island Freeway are also now excluded from the project area - even though the Proposed Project's north and south lead tracks feed directly into this UP line (Figure 2-3a). Furthermore, as the north and south lead tracks serve the purpose of breaking down trains and their active lengths are probably close to 4,000 feet (as opposed to the 1,000 feet cited in the Draft EIR), the active length of the north lead track extends past multiple Long Beach schools and residential receptors; the Draft EIR needs to consider this in the impact analysis. The Draft EIR needs to establish a maximum active length for the trains to ensure active lengths are fully contained within the "project site."

Bad Baseline

City staff see three major issues with the Draft EIR air quality analysis baseline: (1) use of a 2005 baseline rather than 2011 or a more recent year; (2) provision of other "credits" for current emissions and future regulations and agreements; and (3) the diversion of trips from the Hobart Yard conclusions.

While it is true that the Notice of Preparation (NOP) of an environmental impact document on the SCIG Project was completed in 2005, CEQA Guidelines (Sec. 15125-a) require an EIR to include a description of the physical environmental conditions in the vicinity of the project as they exist at the time the environmental analysis is commenced, from both a local and regional perspective. A six-year delay between issuance of the NOP and release of the Draft EIR is highly unusual. Given this lengthy delay, it is strongly urged that the Draft EIR revisit and update the baseline data to better reflect conditions on the ground at the time of the Draft EIR release. This is particularly true since, as the Draft EIR acknowledges, cargo demand at the Port of Los Angeles (POLA) and economic activity generally in the region, actually declined between 2005 and 2011. This means that the emission levels in 2011 are likely lower than they were in 2005; thus, the reductions in emissions reported in Section 3.2 on Air Quality are overstated. In fact, using a revised baseline in combination with the other recalculations discussed below could result in increased emissions rather than the reported reductions.

Erroneous Emissions Analysis

In addition to using the 2005 baseline, it appears that the Draft EIR air quality analysis bases current (baseline) emissions on current (presumably 2005) emission rates and bases future emissions from the same facilities on lower rates anticipated in future years as emission rates for individual vehicles decline. This approach suggests that existing facilities will only be subject to future regulations that will reduce emissions if they relocate. Obviously, this is not the case, so the approach used erroneously implies that emissions associated with relocated facilities will actually decline if the project is implemented as compared to what would occur at the same facilities if the project were not implemented. In reality, emissions associated with existing facilities will decline in future years (and by roughly the same amount) regardless of whether or not the project is implemented and the facilities are relocated. Thus, the analysis contained in Impact AQ-3 overestimates the reduction in emissions that would result from the project. The use of a more appropriate approach which recognizes that emissions from existing facilities as a constant for the "no project" and "with project" scenarios could actually

result in an increase in emissions.

The other related problem is that the POLA has allowed the project to take "credit" for regulations and agreements (described in Table 3.2-7) that will be enforced regardless of whether or not the project is implemented. Thus, Section 3.2 of the Draft EIR shows reductions in emissions and associated health risks and attributes these to the project rather than properly attributing such reductions to pending regulations and agreements.

It is reasonable for the Draft EIR to discuss pending regulations and agreements, and their potential effect on emissions associated with project activities. However, the approach used under Impact AQ-3 improperly attributes the positive effects of these regulations/agreements to the proposed new rail yard. A more appropriate approach would be to consider emissions associated with each of the following scenarios:

- Existing conditions
- Existing conditions + the proposed project (and without pending regulations and agreements – presumably, this would show an increase in emissions)
- Future conditions (including changes in Port activity and pending regulations and agreements)
- Future conditions + the proposed project (including pending regulations and agreements + any changes in activity due to the project itself)

The analysis could then compare "existing + project" emissions to "existing" emissions and compare "future + project" emissions to "future without project" emissions. This would allow a realistic analysis of the project's actual impact rather than falsely attributing forecast emission reductions due to regulations, agreements, and technology improvements to the proposed project.

Diversion of Trips from Hobart Yard

Generally, it seems reasonable to discount emissions associated with existing vehicle trips if the project truly would eliminate such trips. However, the Draft EIR states the following regarding diversion of truck trips from the Hobart Yard:

- Truck trips to and from the Hobart Yard total approximately 814,000 annual round trips in the Draft EIR baseline scenario. (Page 3.2-12)
- Implementation of the proposed project would eliminate 95 percent of existing and future intermodal truck trips between the ports and the BNSF's Hobart Yard. (Page 2-11)
- The project would reduce over 1.3 million annual truck trips between the project site and the BNSF Hobart Yard. (Page 3.10-26)

The Draft EIR also specifically acknowledges that one of the project's purposes is to relieve projected future cargo capacity constraints and that, absent the proposed project, cargo demand will exceed capacity sometime between about 2023 and 2035. (Pages 1-19 and 1-20)

The above statements raise several questions:

- If the project would eliminate 95 percent of truck trips to the Hobart Yard and there are currently 814,000 trips to the Hobart Yard, how can 1.3 million trips be eliminated?
- If 95 percent of the truck traffic to Hobart Yard truly were diverted to the project site, what would happen at Hobart Yard? Would that facility not be used for some other purpose? If so, what impacts might the new use(s) have?
- Is it really reasonable to assume that, as the Draft EIR states, cargo demand will be met at other facilities if the project is not approved? If this truly is the case, then the real impact of the project is represented by the difference in impact between the "future without project" and "future with project" conditions (as discussed above).
- If the Port will meet future cargo demand at other facilities if the project is not approved, where are the other facilities and how do the vehicle miles traveled (VMT) and emissions associated with use of these facilities compare to the VMT/emissions associated with use of the project site?

Understated Cumulative Impacts

The analysis presented in Chapter 4 of the Draft EIR does not provide an accurate picture of what the true cumulative impacts of rail operations will be. For example, the discussion of off-site rail operations on page 4 -153 suggests that only noise from SCIG and ICTF rail operations are considered. All rail operations, including existing and other planned future train operations need to be considered in this analysis, especially as many of these rails (and roads) leading to the Proposed SCIG Project site are located within the City of Long Beach.

Another issue with the cumulative impact analysis is the same one that comes up in the project air quality analysis - the baseline. The conclusion that the project would reduce emissions (based on the comparison to the 2005 baseline) leads the authors to similar conclusions with respect to cumulative impacts. Specifically, we believe the following conclusions are inaccurate:

- Item 4.2.2.4 (Page 4-26): The conclusion that the project would not make a cumulatively considerable contribution to significant cumulative emissions is based on the erroneous conclusion that the project would reduce emissions. If calculated appropriately (as discussed earlier), project emissions may be significant and may, therefore, represent a cumulatively considerable contribution to a significant cumulative impact.
- Item 4.2.2.8 (Pages 4-28 and 4-29): Based on the potentially erroneous conclusion that the project would reduce emissions of toxic air contaminants (TACs), the Draft EIR concludes that the project would reduce cancer risks and would not make a considerable contribution to a significant cumulative impact related to TACs. If calculated appropriately (as discussed earlier), project emissions of TACs and associated health risks may exceed established significance thresholds and may therefore represent a cumulatively considerable contribution to a significant health risk impact.

Faulty Health Risk Analysis and Ultra Fine Particulates

As with the analysis of regional air quality impacts, the project appears to be given credit for emission reductions resulting from regulations and agreements that will be enforced regardless of whether or not the project is implemented. Consequently, the Draft EIR reaches the probably erroneous conclusion that implementation of the project would actually reduce emissions of TACs and associated health risks.

In addition, the Draft EIR (Impact AQ-4, page 3.2-73) acknowledges that project operations would exceed the SCAQMD thresholds for one hour and three annual NO₂, 24-hour and annual PM₁₀, and 24-hour PM_{2.5}. It would also exceed the four NAAQS for one hour NO₂. As these thresholds/standards are intended to be protective of public health, some explanation of why exceedances of these thresholds and standards are not linked to localized health effects is necessary.

To allow the reader to understand the actual impact of the project, the analysis should: (1) compare existing (baseline) conditions to conditions with the project, but without future emission reductions; and (2) compare future conditions with anticipated emission reduction programs to those same future conditions with the project. As performed, the analysis overstates the "benefits" of the project with respect to actual health risks. Although the health risks associated with ultra fine particulates have been a topic of concern for the last several years, they have yet to be regulated at the federal, state, regional or local level. Yet, since evidence is emerging of just how damaging these particulates are to our bodies over time, steps should be taken now to minimize ultrafine particle emissions. For example, the SCAQMD's Draft 2007 AQMP includes some approaches for projects to consider in minimizing ultrafine particle emissions.

- Encourage use of after-treatment technologies combined with oxidation catalyst technology to produce concurrent benefit of ultrafine particle reduction.
- Encourage equipment and vehicle manufacturers to develop diesel particulate filters (DPF) with integrated controls for ultra fines since the additional cost may be relatively minor.
- Work with CARB, US EPA, and other stakeholders in conducting research studies and control strategy development efforts.
- When developing control measures for the reduction of PM₁₀ and PM_{2.5}, consideration should be given for reducing any undesired effects on ultrafine number emissions, where feasible.

We strongly recommend that the POLA adopt these as project mitigation measures.

Inadequate Project Alternatives Analysis

The Draft EIR acknowledges that even if the project is not approved, it is anticipated that cargo demand will be met through the use of existing facilities. This calls into question whether the project is actually needed at all; and suggests that a smaller facility, in conjunction with operational changes at existing facilities, could meet the Port's needs.

Of course, Chapter 5 of the Draft EIR analyzes a reduced project that involves restrictions on

the number of operations at the new facility rather than a reduction in the physical size of the facility. Providing a full-sized facility so near to so many sensitive receptors and thousands of residents, with the potential for expansion of operations, makes expansion of the operation at a later date much easier to accomplish. In addition, given that several of the unavoidably significant impacts of the project relate to the construction activity, we find it a major oversight that the Draft EIR does not consider an alternative that would reduce overall construction activity and duration. This needs to be examined.

Staff also has the following comments on the alternatives analysis, focusing primarily on the air quality and greenhouse gas issues:

- No Comparative Analysis – Across the board, the alternatives analysis fails to identify whether the alternatives' impacts are greater than or less than those of the proposed project. Per CEQA Guidelines Section 15126.6, this comparison is a fundamental purpose of the alternatives analysis. Although the matrix at the end of Chapter 5 provides something of a comparative analysis, each discussion should provided a comparison of the impacts of the alternative and the proposed project.
- Alternative 1 Impact AQ-3 - We disagree with the conclusion that the “no project” alternative would have a “significant” impact to regional air quality. By definition, the no project alternative does not involve new development. As such, although it may be true that not building a new near dock facility would result in increased use of more distant facilities (such as the Hobart Yard), increased use of existing facilities would not be a “project” under CEQA insofar as it would not involve discretionary approvals from a government agency. Consequently, the contention that the no project alternative would have a “significant” air quality impact under CEQA is not accurate. Assuming that implementation of the proposed project truly would result in reduced vehicle miles traveled and air pollutant emissions, it would be accurate to state that the no project alternative would not have the proposed project's benefits and may indirectly contribute to long-term increases in air pollutant emissions as cargo demand increases.
- Alternative 1 Impact GHG-1 - We disagree with the conclusion for the no project alternative with respect to greenhouses gases (GHGs) for the reasons described above. Since the no project alternative is not really a “project” under CEQA, it cannot have “significant” impacts. Again, assuming that project implementation really would reduce GHG emissions, it would be more accurate to state that the no project alternative would not have the proposed project's benefits.
- Alternative 2 Impact AQ-3 – The “Impact Determination” on page 5-39 simply states that there are no operational impacts for the alternative. Though not explicitly stated, we presume that this determination is based on the conclusion that the alternative would reduce emissions as compared to the baseline scenario. As noted above, we adamantly disagree with the way the baseline was used in the analysis.

Inadequate Project Mitigations and Lease Conditions

As noted in the Draft EIR (page 3.2-73), the proposed lease measures are merely recommendations and are not required. However, the impact that these measures are intended to address (Impact AQ-4) has been identified as unavoidably significant.

Consequently, the POLA is obligated to adopt feasible mitigation measures. Because the Draft EIR includes no suggestion that the lease measures are infeasible, they should be included as CEQA mitigation measures. Moreover, mitigation measures 1, 3, and 4 on pages 3.2-79 and -80 are not actually infeasible based on the discussion. For example, Measure 4 (Zero Emissions and Hybrid Trucks) has been dismissed as infeasible merely because its benefits cannot be accurately modeled. The inability to accurately quantify the measure's benefits does not make the measure infeasible. Measures 1 and 3 are dismissed as infeasible because they may have constraints. Absent a definitive conclusion that these measures are infeasible, both measures should be considered feasible and included as mitigation for an unavoidably significant impact.

Construction Hours & Duration – Insufficient Noise Conclusions

The mitigation measures for construction noise are generally reasonable; however, we have the following comments:

- The construction hours prescribed in MM NOI-2 (7 AM to 9 PM on weekdays and 8 AM to 6 PM on Saturdays) are not consistent with the limitations prescribed in the City's Noise Ordinance, which limits noise-generating construction activity to the hours of 7 AM to 7 PM on weekdays and 9 AM to 7 PM on Saturdays. Given that the proposed hours allow weekday evening (7-9 PM) and early Saturday morning (8-9 AM) construction outside the City Ordinance's prescribed hours, the hours should either be changed or construction noise should be identified as an unavoidably significant impact unless it can be demonstrated that noise increases would be less than 3 dBA during these hours.
- MM NOI-2 excludes the PCH grade separation from the recommended construction timing restrictions. We understand that this is necessary to minimize traffic impacts, but unless it can be demonstrated that noise associated with construction of this project component can be reduced to below the threshold (3 dBA increase at a sensitive receptor), this should also be identified as an unavoidably significant impact.

Flawed Truck Routes Analysis

Figure 2-4 SCIG Designated Truck Routes is so vague that it can be considered deceptive. For example, northbound Terminal Island Freeway truck traffic will transition along the northeast corner off-ramp to westbound Pacific Coast Highway (PCH) within a half block of the Century Villages at Cabrillo (CVC) homeless, transitional and supportive services campus of 1,000 residents. Since the NOP release on the SCIG project in 2005, the CVC has increased its resident population by 41 percent; this is not accounted for in the Draft EIR. As proposed, truck traffic from the Ports to the SCIG will exit the freeway on the PCH cloverleaf that empties next to San Gabriel Avenue, the only ingress and egress to this campus. With so many trucks, it is very likely that this will become a major congestion point with trucks queuing up to go west - in effect blocking access to San Gabriel Avenue. However, this intersection was not even evaluated in the Draft EIR. With future truck traffic to the SCIG site anticipated to exceed 5,500 trips per day, Long Beach is very concerned about CVC residents and their roads to recovery, health and wellness. This Draft EIR oversight is significant and egregious. It must be corrected.

Flawed Traffic Noise Methodology

While in general the approach to noise analysis within the Technical Appendix is reasonable, a review of the report indicates that the traffic analysis was performed using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108), or "108 model" (see Section 10 of Appendix F-1). This noise model is no longer recommended for use by either FHWA or Caltrans. As stated on the FHWA webpage (http://www.fhwa.dot.gov/environment/noise/traffic_noise_model/):

"Although an effective model for its time, the "108 model" was comprised of acoustic algorithms, computer architecture, and source code that dated to the 1970s. Since that time, significant advancements have been made in the methodology and technology for noise prediction, barrier analysis and design, and computer software design and coding. Given the fact that over \$500 million were spent on barrier design and construction between 1970 and 1990, the FHWA identified the need to design, develop, test, and document a state-of-the-art highway traffic noise prediction model that utilized these advancements. This need for a new traffic noise prediction model resulted in the FHWA TNM."

The updated methodology is the Traffic Noise Model (FHWA TNM®), first released in 1998, with the latest version (2.5) released in April 2004. Caltrans has required the use of TNM ver. 2.5 since the publication of the revised *Traffic Noise Analysis Protocol* in August 2006, and such requirement is also contained in the May 2011 update of this protocol. Use of the "108 model" has potentially resulted in inaccurate estimates of noise levels based on traffic volumes, and inaccurate barrier effect analyses. The TNM is referenced in Appendix F-1, but no rationale as to why the older "108 model" was used, or whether the analysis used the updated source algorithms contained in the TNM or not. The traffic noise predictions have also been based on peak hour conditions which are then used to predict Leq and CNEL. For most cases, this peak hour assumption has resulted in relatively low vehicle speeds, and consequentially, lower predicted noise levels. Further, it is unknown what relationship was used between the estimated peak hour Leq and the CNEL. As illustrated by the various 24-hour noise monitoring data, the difference in peak hour noise levels and nighttime noise levels was less than would typically be the case for most standard "108 model" applications. These relatively higher nighttime noise levels are indicative of an overall higher CNEL than would be typically predicted by the "108 model."

Appendix F-1 lacks any information regarding the methodology or data behind the rail operations, with Section 11 simply stating "Operational and rail noise modeling input and output files are maintained at AGI offices." This is not adequate access of information under CEQA. At the very least, such information should have been available for review at the lead agency's offices.

The lack of a pre-project and post-project noise contour map for the site makes it difficult to envision the extent of noise impact into the City of Long Beach residential neighborhoods. We highly recommend that contour maps be produced, such as those created for the POLA/POLB by I-H. Khoo and T-H. Nguyen (*Study of the Noise Pollution at Container Terminals and the Surroundings, Final Report - Metrans Project 09-09*; July 2011; California State University, Long Beach).

Inadequate Sound Mitigation

In addition to the construction mitigation concerns above, we have the following comments on the proposed operational mitigation measures:

- MM NOI-1 – The 12-foot sound wall proposed is inadequate. There is no evidence it would reduce both construction and operational noise. Given that the rail yard to the north is using a 24-foot-tall barrier, it appears that this barrier is grossly undersized.

In addition to walls, appropriate vegetative buffers should be a required mitigation for any project such as this, located so close to residential neighborhoods. Although Mitigation for Greenhouse Gases mentions including tree plantings to reduce such emissions, an appropriately designed green landscaped berm should also be included as a project mitigation to combat noise and light pollution as well. All parking areas should have appropriate tree species planted, i.e., low Biogenic Emissions, species that help remove pollutants from the air, and have the ability to sequester greenhouse gases; and the area along the eastern edge of the Proposed Project should be bermed and heavily landscaped with trees and understory plants as well. (The CVC has a good example of how this can be achieved.)

The measures proposed do not support the conclusion that construction noise would be reduced to below a level of significance. Table 3.9-27 shows post-mitigation construction noise levels. Comparison of predicted daytime construction noise with sound walls to measured ambient noise reveals the following differences:

Receptor No.	Receptor Location	Measured Ambient Noise Level (dBA)	Predicted Daytime Construction Noise Level with Proposed Sound Walls	Difference Between Predicted Construction Noise and Ambient *
R1	Residence at 2789 Webster – rear yard	49.4 - 55.3	62.2	12.8
R2	Buddhist Temple at Willow and Webster	59.9 – 60.3	65.8	5.9
R3	Hudson Elementary School Playground	54.2 – 57.8	65.5 – 66.2	12.0
R4	Hudson Park	64.1 – 65.3	70.3	6.2
R5	Cabrillo High School building setback	51.0 – 52.0	57.8	6.8
R6	Cabrillo Child Development Center	63.3 – 64.6	68.1	4.8
R7	Bethune School	63.3 – 64.6	65.0	1.7
R8	Villages of Cabrillo	61.0 – 62.5	64.4	3.4
R30	Stephens Middle School Playground	47.2 – 64.0	57.5	10.3
R31	Webster School	49.2 – 55.7	47.0	(2.2)

* Difference between the higher end of predicted and the lower end of the measured daytime ambient range.

As indicated, all of the receptors except R7 and R31 would experience daytime noise level increases of more than 3 dBA during construction. Thus, even with mitigation, construction noise increases would exceed significance threshold NOI-6 on page 3.9-35, which states that noise impacts would be significant if the project would increase ambient noise by 3 dBA or more. Consequently, daytime construction noise impacts should be classified as unavoidably significant. In addition, assuming that nighttime construction at the proposed PCH overpass would be similar to daytime construction noise levels (up to 62.5 dBA), nighttime noise at the Century Villages at Cabrillo (Receptor R8) would be far more than 3 dBA higher than the measured nighttime ambient level of 48 dBA at that location. Thus, nighttime construction noise impacts should also be classified as unavoidably significant.

Other Noise Analysis Issues

Staff have also identified these additional issues relative to the noise analysis:

- The data provided in tables 3.9-19 and 3.9-20 (pages 3.9-42 through 3.9-47) are inconsistent. For example, Table 3.9-19 shows the existing CNEL at Terminal Island Freeway northbound off-ramp and loop on-ramp at PCH as 81 dBA, while Table 3.9-20 shows the existing CNEL at that same location as 71.5 dBA. The reported existing CNELs at many of the study road segments are similarly inconsistent.
- Tables 3.9-19 and 3.9-20 also show inconsistent results. For example, Table 3.9-19 shows many segments of the Terminal Island Freeway as experiencing a reduction in noise with the project since truck activity would be transferred to rail. Table 3.9-10, on the other hand, shows a substantial increase in noise on many of the same segments, with future (2023) project-related noise increases of as much as 23.8 dBA. Why would the project reduce truck traffic and related noise under one scenario and then show a significant increase in another?
- A recording studio is located at 2200 West Esther Street, Long Beach (Mambo Sound & Recording). Recording studios are both noise and vibration sensitive uses and potential impacts to this facility need to be addressed.

Other Project Impacts

Local Job and Business Losses

Apparently, when the POLA redrew the project boundaries to exclude the SCE property in Long Beach from the project site and termed it "Relocation Sites" adjacent to the rail yard, they felt it was appropriate to abandon the existing businesses on the SCIG site. Over 1,200 good local jobs, employing many Long Beach residents, are being sacrificed and replaced by only 400-some new SCIG jobs. Although building the project would provide construction jobs for a while, upward of 800 permanent jobs will be lost; and the tradeoff for Long Beach residents will be worse air quality, more noise, and nighttime sleep disruption. The Draft EIR acknowledges that businesses will be displaced and relocation sites were not identified for all of them. For those businesses where relocation sites are discussed, most are too small to accommodate the business operations needed, and as a consequence, if this project is approved in this location, they most likely will be forced to close their doors. The City of Long Beach is very displeased with the irresponsible and cavalier approach being promulgated by this project and the City of Los Angeles. Losing jobs in these difficult economic times can

Christopher Cannon
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force families out of their homes and cause a great deal of distress to neighborhoods. The City of Long Beach is anxious to work with the City of Los Angeles to ensure that these businesses can continue providing the good jobs they offer to local residents.

The City of Long Beach appreciates the opportunity to comment on the Draft EIR for the Proposed SCIG Project. All questions regarding this comment letter should be made to Amy Bodek, Director of Development Services, at (562) 570-6428, or to Derek Burnham, Planning Administrator, at (562) 570-6261.

Sincerely,

Patrick H. West
City Manager

PW:AJB:DB:PG

