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Dr. Ralph G. Appy
Los Angeles Harbor Department
425 S. Palos Verdes St.
San Pedro, CA. 90731

IGR/CEQA# 080504/NY
DEIR/DEIS/Berth 97-109 Container Terminal
SCH# 2003061153
LA/110,SR-47

June 6, 2008

Dear Dr. Appy:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Berth 97-109 Container Terminal Project in San Pedro.

We have reviewed the traffic study contained in the Draft Environmental Impact Report (DEIR) document and we have the following comments:

1. Traffic analyses should include an analysis of the mid-day peak period. The mid-day total traffic (trucks and autos) may be less than the AM and PM peak hour volumes. However, its passenger car equivalent (PCE) may exceed the AM and PM PCE values because of large port truck volumes during mid-day. The significance of the traffic impacts generated by the project during mid-day is not determined unless the mid-day peak hour volumes are analyzed. The analysis outputs may be critical and could define a more appropriate improvement or mitigation that could not be concluded from the analysis results of the AM and PM peak periods.
2. The traffic analysis should include the analysis worksheets for Years 2015, 2030, and 2045 proposed project with mitigation. The levels of service shown in Tables 3.6-8 through 10 under future years with mitigation could not be verified.
3. Year 2000 peak hour volumes on SB 47 on-ramp to NB I-110 and NB 47 on-ramp from Harbor Blvd appear to be low. Please verify these volumes.

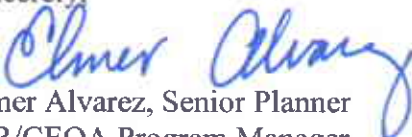
4. Based on our traffic data and V/C analysis during peak period, the Los Angeles County Congestion Management Program (CMP) monitoring station at NB I-710 and Willow Street is currently operating almost at capacity (LOS E) and expected to experience a level of service "F" in 2030. Project related truck traffic could potentially impact this section of the freeway significantly. We request the lead agency consult with Caltrans further to determine appropriate mitigation measures. Mitigation alternatives may include capacity enhancing improvements or fair share funding contribution towards pre-established or future improvements.

In Appendix A of 2004 Congestion Management Program for Los Angeles County, the 2003 Levels of Service at I-710/Willow St monitoring station (NB/EB) during AM and PM peak periods are reported to be "E". Appendix F5 of the EIS/EIR shows that the 2030 Baseline LOS for this station is to improve to LOS "D" during AM and PM peak. Is an improvement being assumed? Please explain.

5. The current level of service at the CMP location at NB I-110/"C" Street is "C" and expected to be "D" in 2030.
6. The LOS and D/C ratio outputs provided in the Appendix F5-CMP Analysis Tables could not be verified. Analysis worksheets are required to substantiate these outputs.
7. Analyses of future scenarios were based on the assumption that the anticipated transportation improvements enumerated under Section 3.6.3.1.5 will be in place in 2015. When the project is completed in 2012 and becomes operational, lane configurations at SR-47/Harbor Blvd, I-110/John S. Gibson Avenue and I-110/Figueroa/C St. interchanges are expected to be the same as the existing until the anticipated improvements are completed in 2015. Between 2012 and 2015 or until the anticipated improvements are in place, the existing lane configurations may not be able to effectively carry the cumulative and project-generated traffic. A significant transportation impact may occur between 2012 and 2015.

If you have any questions or would like to schedule a meeting, please contact project coordinator Nerses Yerjanian at 213-897-6536. Please refer to our record number 080504/NY.

Sincerely,


Elmer Alvarez, Senior Planner
IGR/CEQA Program Manager
District 7