

Community Outreach and Education Program
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September 26, 2007

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P.O. Box 532711
Los Angeles, CA 90053-2325

Dr. Ralph G. Appy, Director of Environmental Management
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731

RE: Comments on TraPac Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS)

Dear Dr. MacNeil and Dr. Appy:

I submit these comments on behalf of the Community Outreach and Education Program (COEP) of the Southern California Environmental Health Sciences Center (SCEHSC). This Center is based at the Keck School of Medicine of the University of Southern California and is composed of scientific researchers from USC and UCLA, many of whom conduct exposure assessment, toxicological or epidemiological studies on the health impacts of air pollution. I direct the Center's outreach program, which is designed, in part, to ensure that the research findings of our Center investigators are understood by the public and considered in public policy decisions.

For more than ten years USC investigators in our Center have been conducting the Children's Health Study, which examines the health effects of air pollution on the respiratory health of school children. The study's findings show that children who grow up breathing polluted air have reduced lung function when they reach adulthood, that air pollution is linked to increased school absences, that children with asthma suffer other health problems (such as bronchitis) when they are exposed to high levels of particulate matter, and that children who live or go to school near busy roads or freeways have more asthma.

Other investigators in our Center at UCLA have published papers on the impacts of exposure to particulate matter, including ultrafine particles. In addition, one of our researchers has published a paper on increased cardiovascular mortality related to PM exposure in Southern California. Many of the USC/UCLA and other relevant scientific papers are submitted on CD for the TraPac DEIR/EIS record.

This comment letter from our Center's Community Outreach and Education Program concerning the TRAPC DEIR/DIES is submitted with these scientific studies – and dozens of other air pollution health investigations – in mind. It is clear to us from reading the DEIR/DEIS that significant air quality and noise impacts will occur from this project, and that not all of the impacts will be mitigated. Below, we review the health impacts from air pollution and noise and then describe deficiencies in the DEIR/DEIS in fully mitigating these risks to protect the public. (*See Appendix A, List of Air Pollution and Health Impact Articles on the CD-ROM that was hand-delivered to the Port of L.A. and sent to the Army Corp of Engineers*). .

SCIENTIFIC EVIDENCE OF HEALTH IMPACTS FROM EXPOSURE TO AIR POLLUTION

A review of the scientific literature on the health impacts of mobile source noise and air pollution shows a growing body of scientific evidence indicating that:

Children who grow up in polluted communities suffer reduced lung function and other respiratory effects.

USC studies in Southern California show that a package of mobile source pollutants (NO_x, PM, acid vapor, and elemental carbon) correlate with reduced lung function. In one USC study, three times as many children in North Long Beach, where levels of elemental carbon (EC) are higher than in most of the communities in the study, had reduced lung function than children in less polluted communities. The study is important because medical experts believe that reduced lung function is a significant predictor of mortality from all causes in adults. The DEIR/DEIS must describe the USC and other studies showing the respiratory health effects of mobile source air pollution. (*See Appendix A-1 for citations to scientific articles on this topic*).

Living or going to school in close proximity to busy roads and freeways (close to mobile source exhaust) is linked to asthma and respiratory effects in children, as well as other effects in adults.

A growing body of evidence shows increased risk of asthma and other respiratory effects from living or going to school in close proximity to busy roads and freeways. (*See Appendix A-2 for citations to scientific articles on this topic*).

Elevated levels of particulate matter are linked to cardiovascular disease and increased mortality.

In response to this growing body of evidence, the American Heart Association issued a scientific statement in 2004 concluding: “Exposure to air pollution contributes to the development of cardiovascular diseases.” A recent study shows an increase in stroke among those living close to busy roads. Studies on increased cardiovascular disease and mortality from particulate exposure should be reviewed in the DEIR/DEIS. *(See Appendix A-3 for citations to scientific articles on this topic).*

Pregnant women who live near busy roads and freeways (and who are exposed to current levels of air pollution in Los Angeles air) are more likely to give birth to low-birth weight and premature infants; infant mortality has also been linked to air pollution levels.

Thousands of women of child-bearing age live in the vicinity of the San Pedro Bay Ports or along goods movement corridors in Southern California. For example, the mixed income L.A. Housing Department complex, Dana Strand, is less than one quarter of a mile from the Port of Los Angeles terminal entrance at Figueroa and Harry Bridges in Wilmington. Studies on increased reproductive problems and adverse birth outcomes must be described in the DEIR/DEIS. *(See Appendix A-4 for citations to scientific articles on this topic).*

Increased lung cancer risks among workers exposed to diesel exhaust, including a recent study on railroad workers.

Based on studies of workers exposed to diesel exhaust, diesel particulate matter was declared a Toxic Air Contaminant in the state of California in 1998. A recent study on diesel and cancer risks authored by Dr. Eric Garshick states:

In > 35 studies of workers with occupational exposure to diesel exhaust, excess risk of lung cancer is consistently elevated by 20–50%.... These results [elevated cancer risk in railroad workers] indicate that the association between diesel exhaust exposure and lung cancer is real. These results along with previous studies of lung cancer and diesel exhaust support current efforts to reduce emissions in both occupational and general environmental settings. (See Appendix A-5 for citations to scientific articles on this topic).

In addition, a cancer study by census tracts, conducted by Dr. Thomas Mack of USC, found an excess of oropharyngeal cancer near the Ports and along the I-710 Freeway. *(See reference to work by Dr. Thomas Mack in Appendix A-5.)*

Diesel exhaust particles can enhance allergies and allergic asthma.

The DEIR/DEIS should describe studies showing the potential for enhancement of allergies and asthma from diesel exhaust emissions at the Ports and from trucks/trains delivering containers to other locations throughout the region. *(See Appendix A-1 for citations to scientific articles on the topic of diesel and allergies).*

The adverse health impacts of breathing ultrafine particles, including neurological effects.

Appendix A-3 includes citations to emerging data on exposure assessment for, and health effects of, ultrafine particles which should be evaluated more thoroughly in the DEIR/DEIS.

Elevated noise levels are linked to worker hearing loss, learning issues in the classroom, as well as to cardiovascular disease and other impacts.

Noise is a significant impact that must be considered in any new projects that the Ports approves. The DEIR/DEIS should evaluate the effects of noise on the health of both workers and residents, including hearing loss, cardiovascular disease, stress, sleep patterns, and the potential effects on students' learning. (See Appendix A-6 for citations to scientific articles on this topic).

Some of the above-mentioned research can be found in the California Air Resources Board's (CARB) Emission Reduction Plan for Ports and International Trade in California (CARB Emission Reduction Plan), which can be found at: <http://www.arb.ca.gov/planning/gmerp/gmerp.htm>.

CURRENT LEVELS OF AMBIENT AIR POLLUTION NEAR THE PORTS AND DOCUMENTATION OF HEALTH IMPACTS

The South Coast Air Basin is currently in non-attainment for a number of air pollutants. In addition, air pollution levels in the Port area exceed a number of State of California air pollution regulations relating to particulate matter pollution. Therefore, it is imperative that any new significant air pollution sources in the Port area must be added to the SCAQMD inventory with serious forethought and planning.

Most importantly, Southern California residents – especially in areas affected by the Ports and goods movement – are already suffering negative health impacts from Port expansion and goods movement, in terms of respiratory and cardiovascular disease and the health impacts of noise exposure. Statewide, the California Air Resources Board (CARB) has calculated that 2,400 annual premature deaths are linked to goods movement, mostly from particulate pollution. [See *California Air Resources Board Emission Reduction Plan (CARB ERP)*, p. 4; <http://www.arb.ca.gov/planning/gmerp/gmerp.htm> Accessed on September 14, 2007). CARB calculates that diesel exhaust is responsible for more than 70% of the risk from breathing our air statewide and in the South Coast Air Basin, respectively. (CARB ERP at 7). In addition, the South Coast Air Quality Management District (SCAQMD) in its MATES II study identified the communities of San Pedro and Wilmington as having among the highest cancer risks in the South Coast, recognizing mobile sources, i.e.

trucks, trains, ships, etc. to be the primary sources of toxic diesel particulate emissions. [See SCAQMD Multiple Air Toxics Exposure Study in the South Coast Air Basin, at ES-5 (“MATES II”)].

Without question, residents of San Pedro, Wilmington and nearby Long Beach will face additional health risks due to increased pollution from the TraPac expansion project. In addition, residents will face additional health risks if they live, work or play along transportation corridors (including Harry Bridges Boulevard) where increased numbers of containers from the TraPac terminal are moved from that terminal throughout the entire South Coast Air Basin. Residents living further east of the Ports will face greater ozone exposure as a result of increased emissions at the Port due to this project. These on-port and off-port health impacts must be taken into consideration.

DEFICIENCIES OF THE TRAPAC DRAFT EIR/EIS WITH REGARD TO AIR QUALITY

In this set of comments, we provide a list of what we perceive as some of the deficiencies of the draft EIR/EIS with respect to air quality and noise – both of which relate to health outcomes. We outline our concerns with the DEIS/DEIR and the proposed project below.

1. The TraPac DEIR/DEIS fails to fully describe the wide array of health impacts from exposure to mobile source pollution related to Port and goods movement activities, including the TraPac expansion.

Recommendation: *The DEIR/DEIS must describe the scientific evidence on exposure to noise and to mobile source air pollution and related health impacts (as described above in this comment letter). The description should include at least: (1) health effects of noise include loss of hearing for workers, cardiovascular disease, learning problems for school children, and difficulty concentrating and (2) health effects from exposure to mobile source air pollution, including cardiovascular disease, respiratory disease (including asthma and cancer), lung function reduction, premature births, and infant mortality.*

2. The Proposed Project Will Cause Serious Health Impacts on Port-Adjacent Communities, on Communities along Transportation Corridors, and on the South Coast Air Basin in General

The new terminal will operate 24 hours a day, 7 days a week, 365 days per year, impacting the local community, transportation corridors, and the entire Air Basin in numerous ways. There will be increased diesel truck, train, yard equipment, harbor craft, and ship activity, which will lead to a vast array of negative health impacts on workers, residents neighboring the proposed project area, residents who live or commute along transportation corridors, and even on residents who live more than 50 miles from the Port

terminal itself, near distribution centers and rail yards that handle or transport cargo containers.

As our documentation of health impact studies above show, there are already significant exposures to air pollutants and serious health impacts occurring at existing levels of air pollution in Southern California and near the Ports. We believe that the proposed project, as described, will cause significant additional harm, that the DEIR/DEIS does not take into account all of the health impacts, and that proper mitigations are not provided in the DEIR/DEIS to prevent these numerous impacts and protect public health

3. Air Quality: The DEIS/DEIR Underestimates Air Quality Impacts

3A. The DEIS/EIR should have a wider geographic area for estimating air quality impacts

The DEIR/DEIS must also consider as an “affected geographic area” for particulate matter and ozone the entire South Coast Air Quality Management District. This is imperative because Port-generated particulate pollution can be transported throughout the air basin, and other air pollutants, released in the Port area by ships, harborcraft, trains, yard equipment and trucks, can form secondary particles as they reach Inland areas. The U.S. EPA describes the differences in particles this way: “*Primary particles* are emitted directly from a source, such as construction sites, unpaved roads, fields, smokestacks or fires. Others form in complicated reactions in the atmosphere of chemicals such as sulfur dioxides and nitrogen oxides that are emitted from power plants, industries and automobiles. These particles, known as *secondary particles*, make up most of the fine particle pollution in the country.” (See U.S. EPA, *Particulate Matter: Basic Information*, available at <http://epa.gov/pm/basic.html>, accessed September 14, 2007.)

3B. The DEIS/DEIR Fails to Quantify and Consider Ozone and Secondary Particle Formation Impacts Throughout the South Coast Air Basin

Ozone (O₃) is a secondary pollutant formed in the atmosphere by photochemical reaction between volatile organic chemicals and nitrogen oxides. The DEIS/DEIR fails to recognize that emissions from project construction and operational sources can lead to the formation of ozone in the presence of sunlight, adversely impacting the health of residents far from the Project site. In the Deep Draft Navigation Improvements Project Final EIR/EIS (1992), the Army Corps of Engineers and Port recognized this and included a broader “region of influence” or affected area for air pollution. That EIR/EIS states: “... the maximum effect of ROG [reactive organic gases] and NO_x emissions on O₃ levels usually occurs several hours after they are emitted and many miles from the source. Therefore, the ROI [Region of Influence] for O₃ may include much of the SCAB [South Coast Air Basin].” (See *Army Corps of Engineers and WorldPort LA, Deep Draft Navigation Improvements Project Final EIR/EIS, September 1992, p. 3.1-1*). .

We request that the affected area for particulate matter include the entire South Coast Air Quality Management District, since Port particulate pollution can be transported throughout the air basin and particulate matter released in the Port area by ships, harborcraft, trains, yard

equipment and trucks can form secondary particles as they reach Inland areas. The U.S. EPA describes the differences in particles this way: “*Primary particles* are emitted directly from a source, such as construction sites, unpaved roads, fields, smokestacks or fires. Others form in complicated reactions in the atmosphere of chemicals such as sulfur dioxides and nitrogen oxides that are emitted from power plants, industries and automobiles. These particles, known as *secondary particles*, make up most of the fine particle pollution in the country.” [See: (See U.S. EPA, *Particulate Matter: Basic Information*, available at <http://epa.gov/pm/basic.html>, accessed October 5, 2006, reprinted as an Appendix to this letter.)

HEALTH IMPACTS OF EXPOSURE TO NOISE

Noise is a serious, and often dismissed, public health problem, which causes numerous health and social effects, ranging from hearing to cardiovascular problems, and from learning problems in school to sleep disturbances at home.

a. Studies on the Impacts of Noise Show that Noise Exposure Causes Health and Psychosocial Impacts

Community and occupational health studies show that noise levels from goods movement activities can impact health and quality of life. For example, workers in the rail industry are at risk of noise-induced hearing loss; excessive noise disturbs restorative sleep; elevated noise levels affect children’s mental health and classroom behavior, especially if children have an “early biological risk” (such as having been born prematurely); and chronic noise exposure may contribute to the progression of cardiovascular disease.

The section on Noise and Health (3.9.2.1.3) in the DEIR/DEIS provided information from a review of the health impacts of noise by Babisch. Additional research findings are provided in Appendix A. Portions of abstracts from several selected studies are reprinted below to illustrate the causes for concern:

a1. “Noise exposures of rail workers at a North American chemical facility,” by P. Landon et al. *Am J Ind Med.* 2005 Apr;47(4):364-9.

ABSTRACT. “This study found that peak impact sound levels exceeded 140 dB in 17 of 18 samples (94%) with a mean peak sound level of 143.9 dB. Maximum continuous sound levels were greater than 115 dBA in 4 of 18 samples (22%) with a mean maximum sound level of 113.1 dBA. *The study concludes that rail workers are at risk of noise induced hearing loss from high impact noise exposures*”. [Emphasis added]

a2. “Disturbed Sleep Patterns and Limitation of Noise” by B. Griefahn et al. *Noise and Health*, Volume 6, Number 22, Jan - Mar 2004, pp. 27-33(7).

ABSTRACT. “Due to the undisputable restorative function of sleep, noise-induced sleep disturbances are regarded as the most deleterious effects of noise. They comprise alterations during bedtimes such as awakenings, sleep stage changes, body movements and after-effects such as subjectively felt decrease of sleep quality, impairment of mood and performance. The extents of these reactions depend on the information content of noise, on its acoustical parameters and are modified by individual influences and by situational conditions. *Intermittent noise that is produced by air traffic, rail traffic and by road traffic during the night is particularly disturbing and needs to be reduced.* Suitable limits are suggested.” [Emphasis added]

a3. “Ambient neighbourhood noise and children's mental health” by P. Lercher et al. Occup Environ Med. 2002 Jun;59(6):380-6.

“OBJECTIVES: To investigate the relation between typical ambient noise levels (highway, rail, road) and multiple mental health indices of school children considering psychosocial and biological risk factors as potential moderators. CONCLUSIONS: Exposure to ambient noise was associated with small decrements in children's mental health and poorer classroom behaviour. The correlation between mental health and ambient noise is larger in children with early biological risk”.

a4. “Noise burden and the risk of myocardial infarction” by SN Willich et al. Eur Heart J. 2006 Feb;27(3):276-82. Epub 2005 Nov 24.

“AIMS: Chronic noise exposure is associated with adverse pathophysiological effects and may contribute to the progression of cardiovascular disease. We, therefore, determined the risk of noise for the incidence of myocardial infarction. METHODS AND RESULTS: In a case-control study, 4115 patients (3054 men, 56+/-9 years; 1061 women, 58+/-9 years) consecutively admitted to all 32 major hospitals in Berlin with confirmed diagnosis of acute myocardial infarction were enrolled from 1998 to 2001 in the Noise and Risk of Myocardial Infarction (NaRoMI) study. Controls were matched for gender, age, and hospital. In standardized interviews, information was obtained on environmental and work noise annoyance. The sound levels of environmental and work noise were assessed using traffic noise maps as proxy and international standards for workplaces, respectively. In multivariate logistic regression models, the adjusted odds ratios of noise variables were determined. ... Environmental sound levels were associated with increased risk in men and women (odds ratios 1.46, 1.02-2.09, P=0.040 and 3.36, 1.40-8.06, P=0.007) ... CONCLUSION: Chronic noise burden is associated with the risk of myocardial infarction. The risk increase appears more closely associated with sound levels than with subjective annoyance”.

a5. “Neighbourhood inequalities in physical inactivity: the role of neighbourhood attractiveness, proximity to local facilities and safety in the Netherlands” by FJ van Lenthe et al. Soc Sci Med. 2005 Feb;60(4):763-75.

In a study in the Netherlands, residents who lived in neighborhoods with the most traffic-related noise pollution seldom walked or cycled to shops or work. This study is relevant to residents in noise and traffic-related goods movement communities, especially at a time when obesity is becoming such a serious problem. (Odds ratio 0.80, 95% confidence interval 0.66–0.97).²⁰

b. Government Agencies Acknowledge that Transportation Noise is a Problem and They Require Regional Transportation Plans to Address Transport Noise Issues

Studies indicate that: “Community resistance to noise begins somewhere between 55 and 65 dB DNL, with the higher level being the current definition for noise-affected populations applied by both the FAA and the Department of Housing and Urban Development and the lower level suggested by the EPA”. See: http://books.nap.edu/html/greener_skies/ch4.html

Regional Transportation Plans created throughout the state of California are required to address noise issues, and the SCAG RTP PEIR, Section 3.5 on Noise, which states that the noise levels near port, railroad, freight and road operations often exceed the levels cited above.

c. Depreciation/loss of value of housing from excessive noise

Several studies have demonstrated that excessive noise lessens the value of housing near the transportation noise sources. See, for example:

- “Impact analysis for highways suggests a decrease from 8 to 10% of property values due to noise emissions by road transportation.” See: <http://people.hofstra.edu/geotrans/eng/ch8en/conc8en/ch8c3en.html>
- “Existing research has investigated the economic consequences of noise exposure in communities empirically. Several studies have examined the impact of noise on property value, concluding that home prices drop about 0.6 percent per dB of DNL exposure.” See: http://books.nap.edu/html/greener_skies/ch4.html

A recent study (2004)* evaluated the impact of freight railroad tracks on housing markets. It found an average loss of 5-7% for houses less than 1250 square feet located within 750 feet of a railroad track. The study said that publicity about an anticipated increase in freight train traffic negatively impacted sales price of small homes.²¹

*Simons RA and El Jaouhari A. The effect of freight railroad tracks and train activity on residential property values. The Appraisal Journal. Summer 2004: vol 72, Issue 3, pp. 223-234.

CRITICAL DEFICIENCIES IN THE TRAPAC DEIS/EIR WITH REGARD TO NOISE IMPACTS

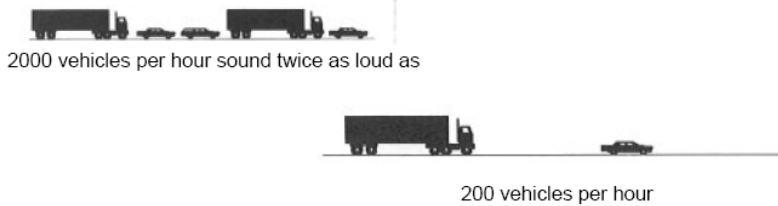
Overview: The TraPac DEIR/DEIS states: “Once completed, operation of improvements at Berths 136-147 implemented by the proposed Project, vehicular traffic on Harry Bridges Boulevard, and operations at the Pier A rail yard, would not cause a substantial increase in noise in the residential areas of San Pedro, Wilmington, and the live-aboards in the marinas near the rail yard.” The DEIR/DEIS concludes that there will be a “less than significant impact” from operational noise.

NOI-3: On-site operations would generate noise, but noise levels would not substantially exceed existing ambient noise levels at sensitive receivers.	CEQA: Less than significant impact NEPA: Less than significant impact
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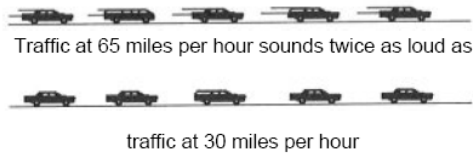
The project will clearly add significant noise impacts to the community residents near and above TraPac and along transportation routes where containers originating at TraPac will be trucked or railed. We are concerned about the manner in which the noise analysis was conducted as detailed below and question the conclusion. In particular, we do not see how it is possible to conclude that additional traffic (let alone terminal operations) will not significantly increase noise levels when the DEIR/DEIS’s own noise sampling shows a dramatically different noise pattern during the afternoon when there is heavy truck traffic than during the nighttime hours along Harry Bridges Boulevard. The DEIR/DEIS consultants measured noise levels on Knoll Hill and commented that: “The higher noise levels during the late afternoon measurement resulted from heavier truck traffic (page 3.9-16)”.

It is common sense that heavier truck traffic adds to noise. But the Federal Highway Administration also documents that this is true in a simple graphic (from <http://www.fhwa.dot.gov/environment/htnoise.htm> accessed Sept. 14, 2007):

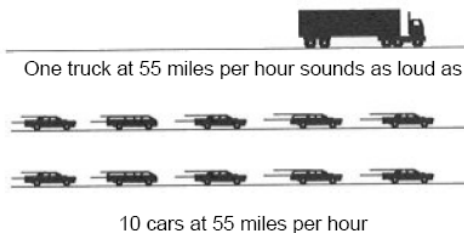
How Traffic Volume Affects Noise



How Speed Affects Traffic Noise



How Trucks Affect Traffic Noise



The FHWA document also states:

“Causes of Traffic Noise: The level of highway traffic noise depends on three things: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the number of trucks in the flow. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and greater numbers of trucks. “

Perhaps the DEIR/DEIS’s own documentation provides the best evidence for consideration: every chart shows more noise during times of the day when there is greater truck activity in and out of the Port terminals. The TraPac project will greatly increase the number of trucks going to the rail yard, operating at the Terminal and traveling on Harry Bridges Boulevard and other roadways. It is inconceivable that this increase in truck volume will result in “insignificant” increases in noise levels. We paste below Figure 3.9-4 as an example of how much increased truck traffic increases the noise level:

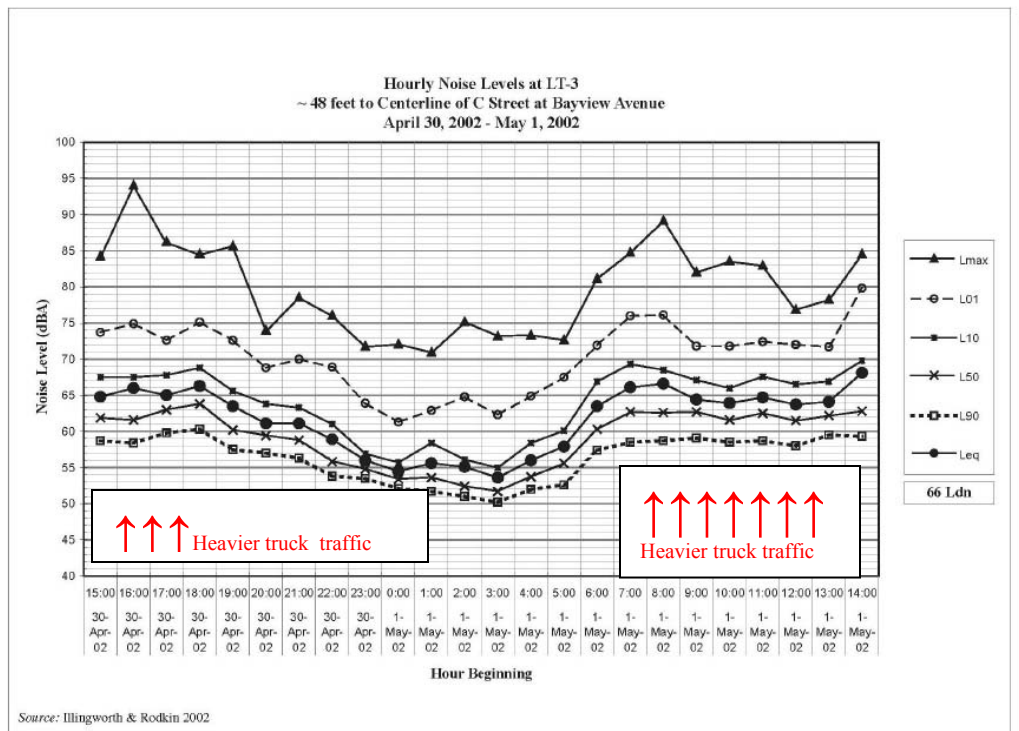


Figure 3.9-4. Hourly Noise Levels at LT-3

Inappropriate baseline monitoring: We are concerned that the baseline for the noise analyses may have been done during a time of active construction at Berth 100 of China Shipping, which would invalidate the sampling periods in April and October 2002 for the TraPac DEIR/EIS as providing an acceptable “baseline” for the DEIR/DEIS. In fact, the “worst-case” scenario for construction noise was a noise survey listed in the DEIR/DEIS as having been conducted in July 2002. A judge later ordered that construction cease on October 30, 2002. We request that the Port of L.A. and Army Corps of Engineers obtain documentation (and provide it for the record and public review) on exactly what construction activities were occurring during the period when noise sampling was conducted and used in this DEIR/DEIS. Without such information, we must assume that construction was occurring during this period, thus invalidating the noise analyses as providing a “baseline” for noise activities during this period.

Too narrow a geographic scope: In addition, we are concerned that the geographic scope for analyzing noise impacts is much too limited. Traffic impacts (including ones declared to be of significant impact) are determined by the DEIR/EIS to exist far from the proposed TraPac terminal itself. For example, in the Project Description – Truck Operations, the DEIR/DEIS states that “terminal planners estimate that in 2025 and thereafter, approximately 70% of the terminals’ cargo (approximately 4,500 truck trips per day) would move by truck at least as far as an off-site rail yard.” The DEIR/DEIS mentions the rail yards in Vernon/East L.A. as examples. Other trucks will head to the

Inland Empire. Thus, noise impacts should be analyzed at these more distant locations also, not just within a stone's throw of the proposed terminal, such as along Harry Bridges Boulevard immediately north of the proposed terminal. The following geographic scope/region of influence for TraPac noise impacts (cut and pasted from the DEIR/DEIS) must be revised:

CANNOT BE ELIMINATED.

Noise (Section 3.9 and Section 4.2.9)

The region of influence for noise impacts includes the residential area in the Wilmington District north of "C" Street located generally between Mar Vista Avenue and Fries Avenue, residents of San Pedro located west of Knoll Hill, and live-aboards in the marinas near the proposed Pier A rail yard site. This is the area over which noise from construction or operation of the proposed Project could have impacts or contribute to cumulative impacts on sensitive noise receptors.

In addition, we note that the "Region of Influence" (ROI) for the *Port of Los Angeles Deep Navigation Project (Final EIR/EIS, 1992, Section 4H.1.1* with regard to noise impacts included "the area surrounding the offshore and onshore elements of the project alternatives." The ROI also included the "corridors adjoining the ground transportation routes, including both vehicular and rail traffic, that would be used to access the Port. Any noise sensitive receptors which could be affected by noise from project construction or operation, both on-site and off-site, are included in the ROI." In fact, that 1992 EIR/EIS considers the noise levels at the Union Pacific Intermodal Container Transfer Facility (UP ICTF) in Carson on west Long Beach residents and reports on noise monitoring surveys conducted there. We request that the final EIR/EIS include a much wider geographically affected area than does the draft, including along the 110 Freeway, Alameda Street, Terminal Island Freeway, I-710 Freeway, Alameda Corridor, near the ICTF, and along other roadways. We request that the final EIR/EIS include a comparison between noise levels in 1992 (if they exist) with current noise levels to show the impact of Port operations on local residents in L.A. and Long Beach.

Recognition that area is already a "degraded noise environment" due to port operations. We note that the environment near the proposed TraPac expansion is already a "degraded noise environment" and that noise levels currently present are higher than what is typically acceptable in a residential community. We question whether the additional noise from terminal operations as well as thousands more trucks traveling on Harry Bridges Boulevard, the 110 Freeway, Alameda Street and other roadways can possibly be of "insignificant impact" to residents.

The noise surveys in the China Shipping DEIR/EIS, not provided in the TraPac DEIR/DEIS, show that over a 24-hour weekend period, on a Sunday, when the Port was not yet operating its "Pier Pass" 24/7 operation, the noise levels at 207 W. Amar Street, a residential location that the DEIR/DEIS says "overlooks the West Basin" (*DEIR/DEIS at 3.11-21 in China Shipping DEIR/DEIS*), has a CNEL of 57 dBA. The Ldn for Harry Bridges Blvd, 57 feet from the Center, is 77 dBA. For Shields Drive, the Ldn is 72 Ldn. This appears to indicate that the area immediately north and west of the proposed TraPac

Terminal is already a “degraded noise environment” into which additional sources of noise would create an even more serious noise problem.

Note that the Los Angeles Land Use Compatibility Guidelines state that levels of noise between CNELs of “70-75 dBA” are “normally unacceptable.” The Guidelines (*see DEIR/DEIS Table 3.11-5*) state that at these noise levels: “New construction or development generally should be discouraged.” An explanation should be provided in the final EIR/EIS on how this project is in accord with this guidelines.

In addition, we request that the Port of Los Angeles explain in the final EIR/EIS what causes the noise levels at residential locations in close proximity to the Port to rise from 57 dBA on a Sunday to a completely unacceptable Ldn (even before TraPac) of 72 or 77 dBA on a weekday and explain how the 24/7 TraPac project will not add even more to those port-related noise levels.

Below are more detailed concerns re the noise surveys in the DEIR/DEIS:

1. Community Noise Survey 1. April 30, 2002 – May 1, 2002. Along C Street and Harry Bridges Blvd.

NOTE: These measurements were taken the week after the Alameda Corridor opened for operation (Alameda Corridor opened for operation on April 15, 2002), likely an unusual period of activity. These surveys were take during a period of time that was apparently during active construction at Berth 100 of China Shipping, in light of the #2 below and #3 below.

2. Construction noise survey. July 15, 2002. “Noise survey during construction at Berth 100” to determine “worst case scenario” during active construction. See “Table 3.9-9 of TraPac DEIR/DEIS. Berth 100 Wharf Construction Noise Levels Measured July 15, 2002.”

3. Community Noise Survey 2. October 29-30, 2002. San Pedro near West Basin.

What the TraPac DEIR/DEIS claims: “Construction activities at Berth 100 were virtually complete. The backland areas were nearly all paved and there were no activities at the wharf. Construction noise did not make a measurable or noticeable contribution to the October 2002 noise measurement survey. Data are presented in Table 3.9-3.”

What the court case shows: A judge ordered a partial halt to construction at China Shipping on October 30, 2002, according to the Project Description in the China Shipping DEIR/DEIR. <http://www.nrdc.org/media/pressreleases/021030b.asp>

What the construction schedule shows: in addition, the Construction Schedule for China Shipping Berth 100 following the court judgment shows active construction during Quarters 2, 3, and 4 of 2002, which include the quarters during which the noise surveys were conducted.. The China Shipping DEIR/DEIS Project Description also states that Phase I construction was completed in 2003 and took 20 months to complete.

Sampling done inappropriately two weeks after the Port lockout – another non-representative period of time. The Port lockout ended on October 12, 2002. The October 29-30, 2002 measurements were taken 2 ½ weeks after the Port lockout ended, an intense period of activity at the Port, in no way typical of normal activities. Dates in late October 2002 should not have been selected as a time to take baseline noise measurements. Even if construction was not going on, noise levels would have been higher during those two days because of intense activities to unload backed up containers and truck/rail them out of the Port.

We question the thoroughness of the noise section of the TraPac DEIR/DEIS for the following additional reasons as well:

- No contour maps of CNELs are provided in the DEIR/DEIS which would assist reviewers in understanding the levels of noise and these should be included in the final EIR/EIS. These seem to be available in the noise sections of most other EIRs.
- In addition, with regard to Harry Bridges Blvd and several other arterials the DEIR/DEIS says that additional lanes will be added (as traffic mitigation measures) (see below cut and pasted from the document), yet no noise measurements (baseline or predicted) are in the document to define what such road expansions would do to noise levels for community residents.

Mitigation Measures

The following intersection mitigation measures would be implemented to mitigate the significant impact of Project-related traffic. Tables 3.10-6 and 3.10-7 present the level-of-service results with implementation of the mitigation measures for 2015 and 2038, respectively.

Trans #2: *Avalon Boulevard and Harry Bridges Boulevard* – Provide an additional eastbound through-lane on Harry Bridges Boulevard. This measure shall be implemented by 2038.

Trans #3: *Alameda Street and Anaheim Street* – Provide additional northbound and southbound through-lanes on Alameda Street, and provide a northbound free right-turn lane from northbound Alameda Street to eastbound Anaheim Street. This measure shall be implemented by 2015.

Trans #4: *Fries Avenue and Harry Bridges Boulevard* – Add dual northbound left-turn lanes from northbound Fries Avenue to westbound Harry Bridges Boulevard, and provide an additional northbound right-turn lane from northbound Fries Avenue to eastbound Harry Bridges Boulevard. This measure shall be implemented by 2038.

Trans #5: *Broad Avenue and Harry Bridges Boulevard* – Provide an additional eastbound through-lane on Harry Bridges Boulevard. This measure shall be implemented by 2038.

- No evaluations were made of single event nighttime noise, a problem described by many residents of Wilmington

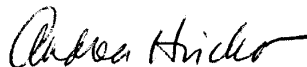
- The Federal Highway Administration Guidelines require that noise consultants “predict traffic noise levels using traffic characteristics that will yield the worst hourly traffic noise impact on a regular basis for the design year” and we can find no place in the document where this calculation is performed and no indication that the dates chosen for the noise monitoring surveys were chosen because they represented the “worst hourly traffic noise impact on a regular basis.” Since Harry Bridges Blvd is being widened, we believe this requirement should be met.
- No evaluations appear to have been made of nighttime noise when PierPass is in operation and the new terminal is operating 24/7.

If these discrepancies and other problems noted above and not clarified to satisfaction in the final EIR/EIS, then we believe that the noise surveys in the DEIR/DEIS should not be considered valid for the purposes of evaluating the TraPac project’s noise impacts.

CONCLUSION

We are concerned that the Port intends to engage in a huge terminal expansion despite already significant public health impacts in Southern California from existing Port operations. Without question, the new terminal will increase overall emissions and community noise from the Port of Los Angeles related to ships, trucks, trains, yard equipment and harbor craft. We have outlined deficiencies with the proposed expansion project and the DEIR/DEIS methodology and conclusions that we believe must be addressed. The proximity of this project to residents near the Port, transportation corridors, rail yards and cargo distribution centers in Southern California will result in air quality and noise impacts that must be addressed in order for this project to truly be considered. Moreover, there will be significant impacts in terms of particulate matter and ozone formation on the broader Los Angeles Air Basin that have not even been mentioned in the DEIR/DEIS. If the project proceeds, we request that the most intensive efforts be made to mitigate all environmental health impacts, including during construction and future operation. Thank you for considering these comments.

Sincerely,



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APPENDIX A: Health Impact Studies

Appendix A-1: Respiratory and Children's Health Study

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