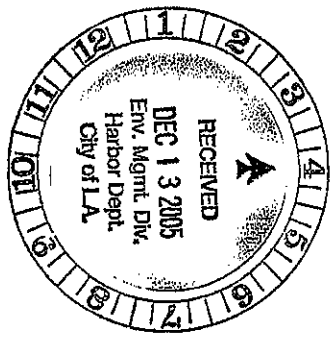
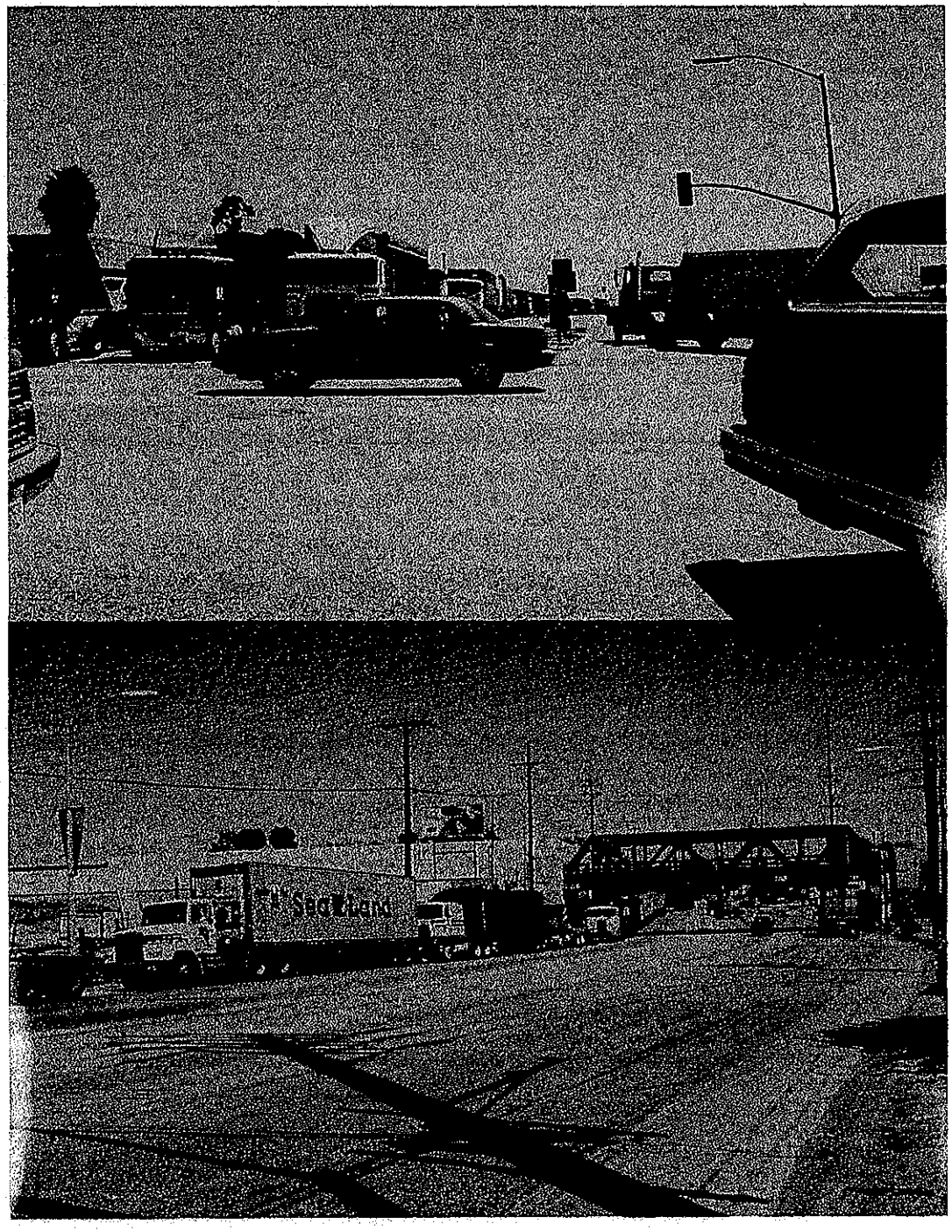
- These are pictures of the Union Pacific train tracks between Sepulveda and Wardlow Road. These are the tracks that BNSF is proposing using as switching tracks to take containers north to Wardlow Road and them back onto the BNSF facility.
- I would like these put into the record. The pollution and noise from these trains running daily, 24/7, would have a negative impact on all residents. Also, it is very near two schools, HUD housing and senior housing, as well as a 1000's of residents.

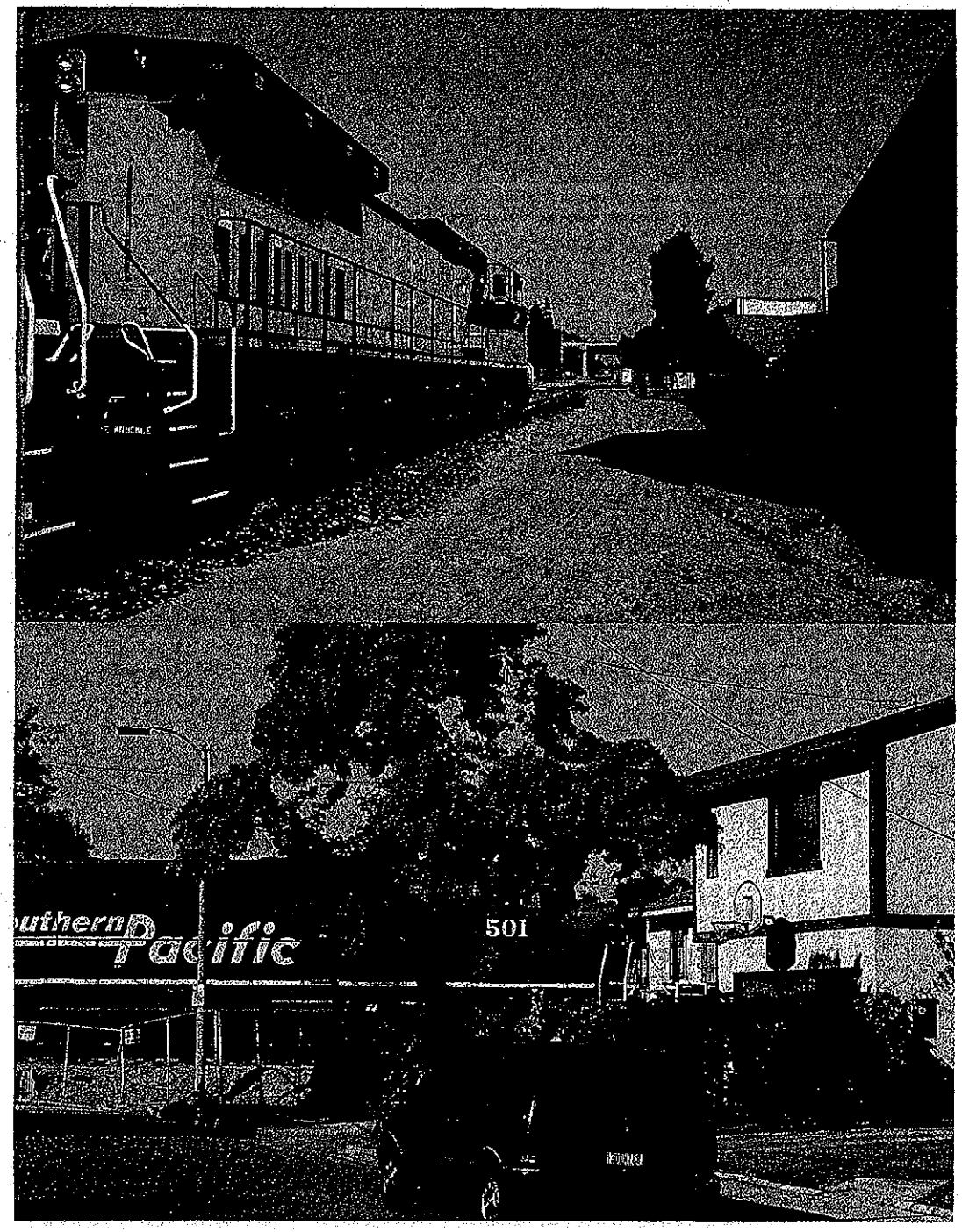
Nick Sramek
1816 Lincoln St.
Long Beach, Ca 90810
562 426-2719



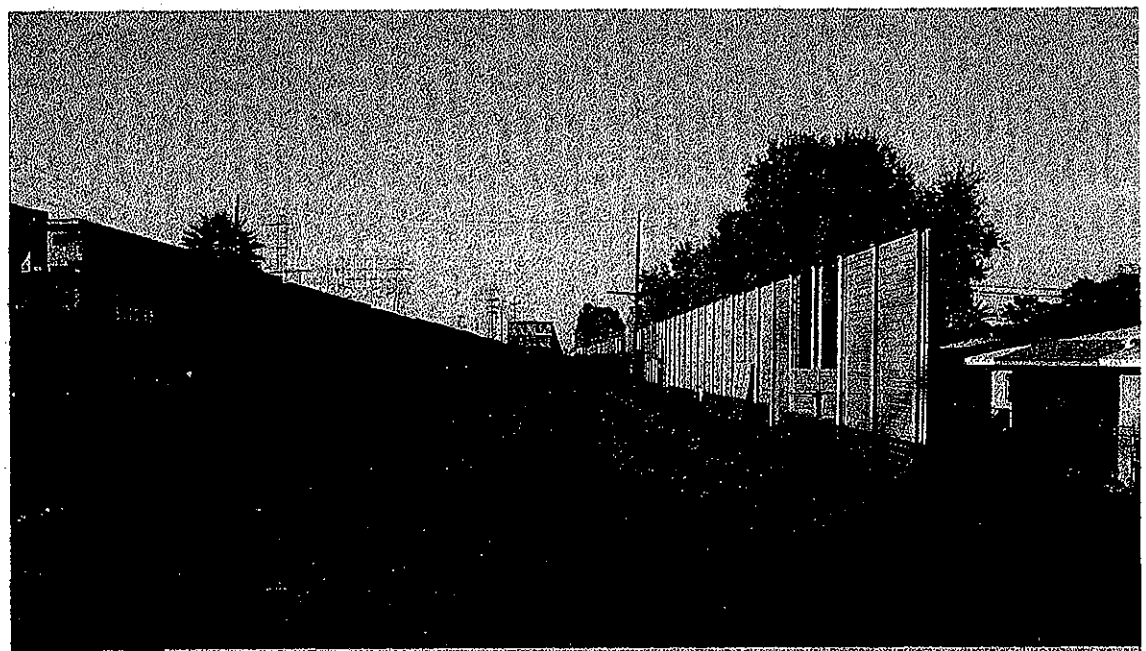


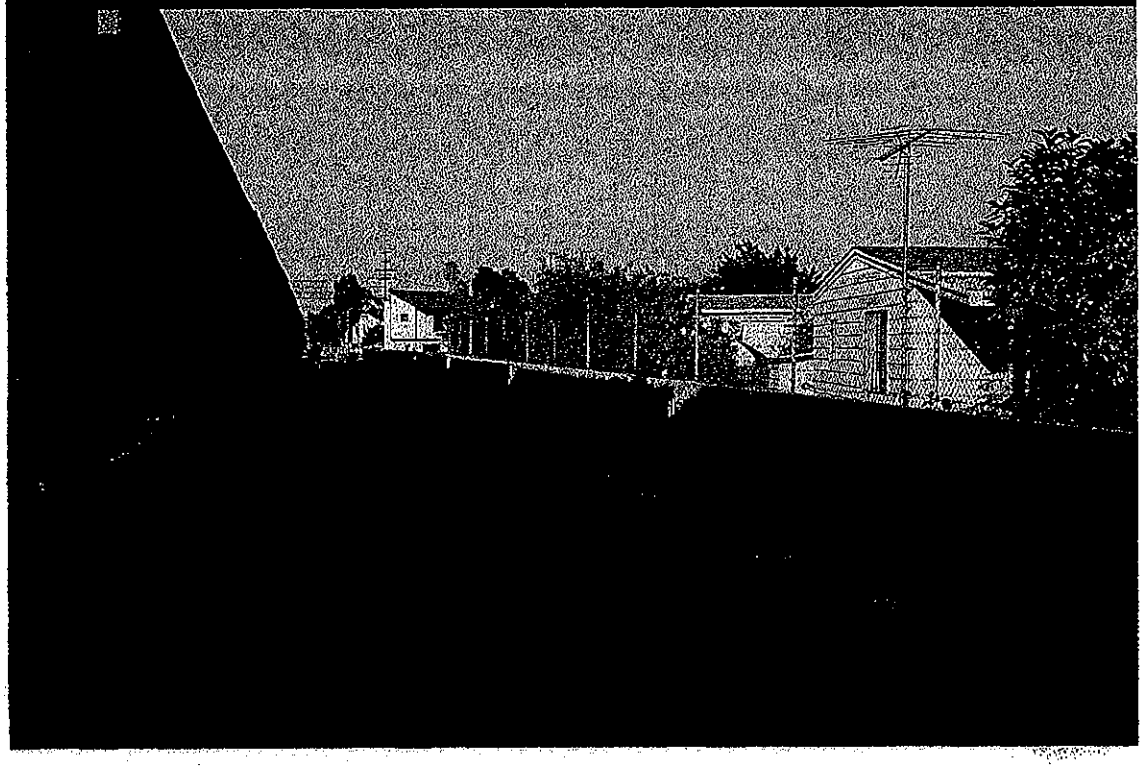
Trucks backed up on TI Freeway waiting to get into ICTF. This happens every time a ship is unloaded with containers going to ICTF.

Trucks waiting to go into ICTF, coming off of TI Freeway

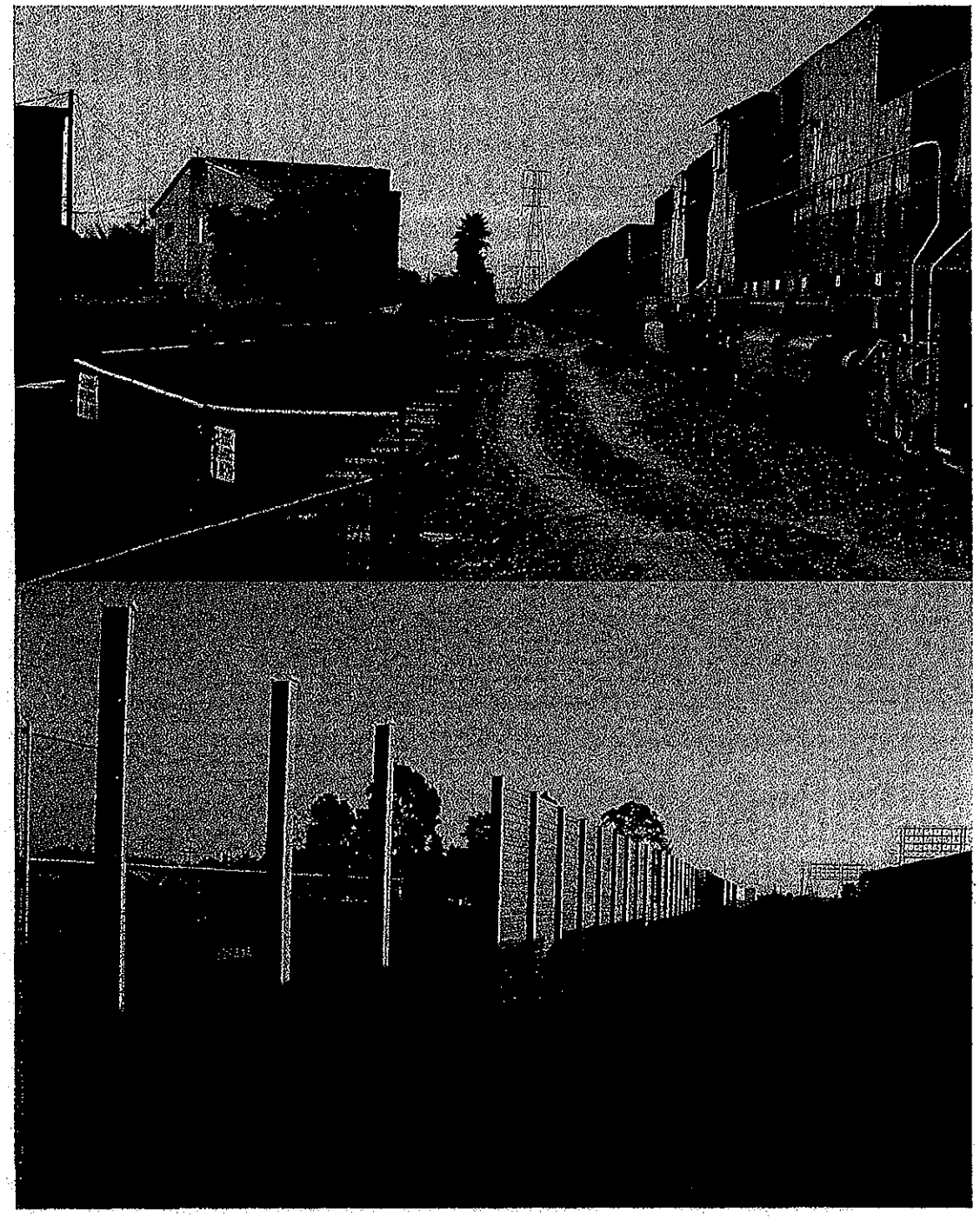


These pictures show how close the trains are to homes on the Westside of Long Beach. The bottom picture is looking West on Lincoln St. with an engine parked. Both engines were left running for almost 3 days, next to homes. These tracks would be the tracks BNSF wants to use for switching their container cars going to Wardlow Road and them backing onto the BNSF facility.





These are more pictures showing how close the tracks and trains are to homes along the tracks between Willow/Sepulveda and Wardlow Road.



Another view of how close the train is to homes.

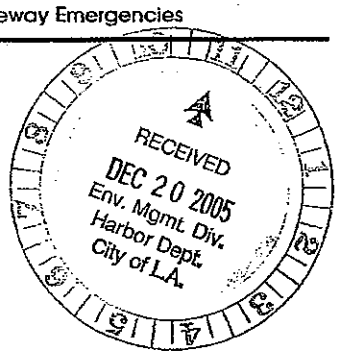
This is the Stephens Middle School ballfield with the tracks only 20 feet away. The school kids also do all other outdoor sports on this field.

Governments
SANBAG
Working Together

San Bernardino Associated Governments
1170 W. 3rd Street, 2nd Floor San Bernardino, CA 92410-1715
Phone: (909) 884-8276 Fax: (909) 885-4407 Web: www.sanbag.ca.gov

TRANSPORTATION MEASURE I

■ San Bernardino County Transportation Commission ■ San Bernardino County Transportation Authority
■ San Bernardino County Congestion Management Agency ■ Service Authority for Freeway Emergencies



December 13, 2005

Ralph G. Appy, Ph.D.
Director of Environmental Management
Port of Los Angeles
P.O. Box 151
San Pedro, CA 90733

Subject: Comments from the San Bernardino Associated Governments on the Supplemental Notice of Preparation for the Southern California International Gateway Project

Dear. Dr. Appy:

Thank you for the opportunity to review and comment on the Supplemental Notice of Preparation issued on October 31, 2005 for the Southern California International Gateway Project. The San Bernardino Associated Governments (SANBAG) is the council of governments, county transportation commission, and transportation planning agency for San Bernardino County. Nearly all of the rail freight and an estimated 40 percent of the truck freight flowing into and out of Southern California passes through San Bernardino County.

Because of the impact of goods-movement activities on San Bernardino County, and because of the substantial contribution of port-related freight movements to those impacts, SANBAG requests that the EIR provide the following analyses:

- An assessment of the increase in truck and rail volume through San Bernardino County that will be enabled by the SCIG. This should include an assessment of volume increases (both near term and at least 20-years into the future) with and without the SCIG. The EIR should also document the total flows the SCIG is expected to handle in the future.

- A quantification of the impacts of increases in truck and rail volumes on infrastructure, operations, communities, and the environment in San Bernardino County. This should include requirements for additional rail and highway infrastructure capacity, impacts on traffic delays at rail/highway grade crossings, and impacts on noise and air quality along train and truck routes.

- An assessment of the effect of the SCIG on operations at existing intermodal facilities in San Bernardino County, such as the BNSF facility in the City of San Bernardino.

rga051213-ss

We appreciate your consideration of the above comments. The proposed SCIG is aptly named the Southern California International Gateway, and we trust that the EIR will assess the facility from a true regional perspective. SANBAG would be happy to assist you in assembling data for San Bernardino County related to this request. Please contact Steve Smith, Principal Transportation Analyst at (909)884-8276 to coordinate data needs.

Sincerely,

Ty Schuiling
Director of Planning and Programming

December 13, 2005

Dr. Ralph Appy
Director of Environmental Management
Los Angeles Harbor Department
425 South Palos Verdes Street
P.O. Box 151
San Pedro, CA 90733-0151

RE: Notice of Preparation for Draft Environmental Impact Report
Southern California International Gateway Project
Case No. ADP 041027-199

Dear Dr. Appy:

Union Pacific Railroad Company (Union Pacific) appreciates the opportunity to submit the following scoping comments on the Port of Los Angeles' (POLA's) Draft Environmental Impact Report (DEIR) for the Southern California International Gateway project (SCIG).

Union Pacific has a strong interest in POLA's plans to enhance intermodal goods movement throughout the San Pedro Ports to accommodate projected trade growth. We agree with the conclusion of the Port's 2004 Rail Policy that near-dock rail facilities must be expanded to handle that growth. As a result, we strongly support construction and operation of the SCIG as Burlington Northern Santa Fe has proposed.

Union Pacific is simultaneously pursuing completion of our existing Intermodal Container Transfer Facility (ICTF) north of the SCIG site. POLA has already indicated in the notice documents that it will evaluate the SCIG project's cumulative CEQA impacts in light of other past, present, and probable future projects, which would include Union Pacific's planned completion of the ICTF. Union Pacific favors a coordinated approach for both projects and will continue to work with POLA staff as we refine our plans for ICTF completion.

Please don't hesitate to contact me at any time if you have questions.

Sincerely,

Scott D. Moore
General Manager - Public Partnerships

UNION PACIFIC RAILROAD
1400 Douglas St., Stop 1560, Omaha, NE 68179-1560
ph. (402) 544-3706 fx. (402) 233-2383
sdmoore@up.com

From: "Tari Taricco" <TariT@taricco.com>
To: <CEQAComments@portla.org>
Date: 12/13/2005 1:53:11 PM
Subject: Southern California International Gateway

Comments on the on going cancer that is the Port of LA.

The following comments are made to persuade the Port not to expand further
and to point out future problems the expansion will create.

1) The project location North of PCH is not suitable since the Ports were to be limited to South side of PCH. Council woman Hahn has worked to reduce the Port impact and this is not suitable.

2) The project puts unreasonable additional traffic and pollution loads on PCH and Anaheim streets and the entire area due to trucks and trains.

3) Cal Trans should deny any additional truck traffic on PCH which is already overburdened in this area.

4) SCAQMD should deny this project due to its major pollution impact. Any project should decrease, not increase pollution.

5) It is not possible for this project to result in a pollution reduction for the surrounding community and an increase in the quality of life? (Not without smoke and mirrors such as maglev and related fraudulent deflections)

6) Why exactly should these cancerous projects continue to consume and burden the surrounding communities?

7) Why are all port projects a loose-loose for the surrounding communities and serve to benefit the Chinese, the inland US consumer etc?

8) Why is the Port a bad neighbor to the communities?

9) The Port can build this facility offshore not onshore.

With best regards,

Tari Taricco
Taricco Corporation
Web: www.taricco.com <blocked::http://www.taricco.com>
Phone: (562) 437-5433
Fax: (562) 901-3932

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Any questions should be directed to sales@taricco.com
Taricco Corporation uses regularly updated anti-virus software in an attempt to reduce the possibility of infection. However, we do not guarantee that any attachments to this email are virus free.

CC: <district1@longbeach.gov>

long beach unified school district

Long Beach Unified School District
BUSINESS DEPARTMENT - Business Services
Facilities Development & Planning Branch
2425 Webster Ave., Long Beach, CA 90810
Phone (562) 997-7550 FAX (562) 595-8644

December 14, 2005

Ralph G. Appy, Ph.D.
Director of Environmental Management
Port of Los Angeles
425 S. Palos Verdes Street
San Pedro, CA 90733-0151

Via Hand Delivery, Fax and U.S. Mail

Subject: Comments on Southern California International Gateway Project (Notice of Preparation)

Dear Dr. Appy:

The Long Beach Unified School District ("District") appreciates the opportunity to comment on the Notice of Preparation ("NOP") prepared for the proposed Southern California International Gateway Project ("Project") by the Port of Los Angeles/City of Los Angeles Harbor Department ("Port"). As the Port may be aware, the District is statutorily required to provide safe and clean school facilities and to provide a high quality public education to students within its boundaries. While the District was originally established in 1885 with fewer than a dozen students meeting in a borrowed tent, the District is now fully responsible for providing school facilities and public education services to more than 95,000 students in 95 public schools in the cities of Long Beach, Lakewood, Signal Hill, and Avalon on Catalina Island. It is the third largest school district in the state of California and employs more than 8,000 teachers and staff, making it the largest employer in the City of Long Beach.

In addition to establishing high standards of academic excellence for its students, the District is committed to providing a safe environment and school facilities for its students and employees. Thus, the District's primary concern in its review of the NOP is to distinguish the environmental impacts which must be properly addressed, analyzed, and mitigated to assure an environment conducive to learning. This letter, therefore, identifies Project impacts which may effect the health, safety and welfare of the students and staff of schools located closest to the proposed Project facilities. The Project EIR must address all possible future impacts on the District, including the District's ability to develop new school facilities and/or expand existing schools in accordance with state mandated requirements.

Overview of Potential Project Impacts on School Facilities

The proposed Project described in the NOP is generally bounded by the Terminal Island Freeway to the east, Sepulveda Boulevard to the north, the Dominguez Channel to the west, and Pacific Coast Highway to the south and portions of the Project would be located in the Cities of Los Angeles, Carson, and Long Beach. The proposed Project consists of a near-dock rail loading and unloading facility to facilitate the movement of container freight in and out of the Port by rail. The District understands that completion of the proposed Project will allow the Port to accommodate the increased rail and truck traffic associated with the existing and future levels of containerized freight the Port plans on handling.

Based on the District's review of the NOP and the Project area, the District believes that there are at least seven schools, a Child Development Center and a maintenance facility currently operating in the vicinity of the Project site and/or planned Project facilities/operations. These school facilities are listed below and are all within less than one mile of the Project or portions thereof, with the closest school located only 210-feet away (see attached Figure 1):

1. Webster Elementary School – 1755 W. 32nd Way
2. Stephens Middle School – 1830 W. Columbus Street
3. Cabrillo High School – 2001 Santa Fe Avenue
4. Hudson Middle School (& Maintenance Facility) – 2335 Webster Avenue
5. Reid High School – 2152 W. Hill Street
6. Garfield Elementary School – 2240 Baltic Avenue
7. Muir Elementary School – 3038 Delta Avenue
8. Bethune Transitional Center (school for homeless students) – 2041 San Gabriel Avenue
9. Child Development Center – 2209 Seabright Avenue

Given the proximity of the Project to the above described schools, the District is very concerned that Project implementation could have a number of potentially significant direct and indirect impacts on the District's school facilities identified above, as well as the students and staff using these facilities. The District will provide its specific concerns in greater detail below, but the District is particularly concerned that the EIR analyze, address, and mitigate any potentially significant impacts associated with the following:

1. Hazardous air emissions associated with the rail yard, increased rail operations, and additional truck traffic from the Project.

2. Noise associated with the rail yard, increased rail operations, and additional truck traffic from the Project.

3. Public health and safety issues associated with spills, leaks, or other accidents from rail or truck traffic as well as any pipelines within the vicinity of District facilities.

4. Traffic impacts associated with additional truck traffic to and from the Project site generating health and safety issues, such as additional air pollution and increased traffic on routes to and from school sites that students may utilize.

Potential Mitigation Measures

In order to ensure none of the above described Project impacts rise to a potentially significant level, the District suggests the EIR analyze the following potential mitigation measures to offset such impacts;

1. Construction of gymnasiums/multipurpose rooms at schools currently without such facilities so that District students and staff have indoor facilities for exercise and other activities to avoid hazardous emissions or unhealthful air quality.

2. Construction of enclosed lunchroom facilities so that District students and staff have indoor facilities for lunch and other activities to avoid hazardous emissions or unhealthful air quality.

3. Improvements to District air conditioning/filtration units at schools, which do not currently have sufficiently modern or appropriate equipment necessary to ensure adequate indoor air quality.

4. Construction of sound barriers/installation of dual-paned windows to offset noise impacts to potentially impacted schools.

5. Construction or improvement of rail and/or traffic signals and crossings to ensure the safety of students en route to school facilities given the potential increased traffic associated with the Project.

Specific Concerns

In the paragraphs that follow, the District describes the specific concerns it has concerning the Project's potential environmental, health and safety impacts and requests that the Port thoroughly address these issues in the upcoming EIR. The EIR should fully recognize that schools must be treated as a sensitive land use given the concentration of young children within and around these facilities for many hours of the school day and during after-school activities. In addition, students themselves must be treated as sensitive receptors given the disproportionate impacts certain pollutants have on children.

Secondly, the District requests that the EIR recognize the unique nature of school facilities under California law. Schools are one of the most protected and heavily regulated land uses. The development of new schools and expansion and modernization of existing schools trigger a myriad of special regulatory requirements for the District that are enforced by a variety of state agencies, which makes finding an adequate school site, and/or expanding an existing school site challenging. These regulations include review and approval by the California Department of Education, the Department of Toxic Substances Control and various other agencies, and often trigger special studies to confirm that stringent health and safety standards are met. Such studies may involve various agency consultations and oversight and the use of rigorous study protocols. This very high level of review creates great difficulty in constructing school facilities. Therefore, the District is very concerned that the proposed Project may subsequently preclude it from upgrading or expanding the schools in the vicinity of the Project described above. These statutorily proscribed site constraints may also make it impossible to find new or replacement school sites in this community after the Project is complete.

Title 5 and Statutory School Siting Issues

The District requests that the EIR evaluate the Project's potential direct and indirect impacts on nearby school facilities in conformance with the school siting requirements established in Title 5, California Code of Regulations (CCR), the Education Code, and the Public Resources Code. If the Project, or any portion thereof, involves the activities described below, the EIR must contain the appropriate study including a level of analysis sufficient to satisfy the state agencies with regulatory authority over the District. To accomplish this level of analysis, the District recommends that the Port analyze Project impacts on District facilities and students as though it were the District. In other words, if a rail line is proposed to be sited within 1,500 feet of school site, the Port should conduct a comparable safety study to that which would be required of the District if it proposed placing a school site within 1,500 feet of the same rail line. Please ensure that the EIR evaluates not only the relationship and proximity of the main components of the Project to the District's school facilities, but also any infrastructure or utilities that would extend to the Project site (especially power lines and pipelines) or other support facilities.

For the Port's reference, Section 14010 of Title 5, CCR contains the following special criteria for potential hazards in the vicinity of school sites:

a. The property line of a school site even if it is a joint use agreement shall be at least the following distance from the edge of respective power line easements: (1) 100 feet for 50-133 kV line; (2) 150 feet for 220-230 kV line; and (3) 350 feet for 500-550 kV line.

b. If the proposed site is within 1,500 feet of a railroad track easement, a safety study shall be done by a competent professional trained in assessing cargo manifests, frequency, speed, and schedule of railroad traffic, grade, curves, type and condition of track need for sound or safety barriers, need for pedestrian and vehicle safeguards at railroad crossings, presence of high pressure gas lines near the tracks that could rupture in the event of a derailment, preparation of an evacuation plan. In addition to the analysis, possible and reasonable mitigation measures must be identified.

c. The site shall not be adjacent to a road or freeway that any site-related traffic and sound level studies have determined will have safety problems or sound levels, which adversely affect the educational program.

d. Pursuant to Education Code sections 17212 and 17212.5, the site shall not contain an active earthquake fault or fault trace.

e. Pursuant to Education Code sections 17212 and 17212.5, the site is not within an area of flood or dam flood inundation unless the cost of mitigating the flood or inundation impact is reasonable.

f. The site shall not be located near an above-ground water or fuel storage tank or within 1500 feet of the easement of an above ground or underground pipeline that can pose a safety hazard as determined by a risk analysis study, conducted by a competent professional, which may include certification from a local public utility commission.

g. The site is not subject to moderate to high liquefaction or landslides.

h. The shape of the site shall have a proportionate length to width ratio to accommodate the building layout, parking and playfields that can be safely supervised and does not exceed the allowed passing time to classes for the district.

i. The site shall be easily accessible from arterial roads and shall allow minimum peripheral visibility from the planned driveways in accordance with the Sight Distance Standards established in the "Highway Design Manual," Table 201.1, published by the Department of Transportation, July 1, 1990 edition, and incorporated into this section by reference.

j. The site shall not be on major arterial streets with a heavy traffic pattern as determined by site-related traffic studies including those that require student crossings unless mitigation of traffic hazards and a plan for the safe arrival and departure of students appropriate to the grade level has been provided.

k. Existing or proposed zoning of the surrounding properties shall be compatible with schools in that it would not pose a potential health or safety risk to students or staff in accordance with Education Code Section 17213 and Government Code Section 65402 and available studies of traffic surrounding the site.

l. The site shall be located within the proposed attendance area to encourage student walking and avoid extensive bussing unless bussing is used to promote ethnic diversity.

m. The site shall be selected to promote joint use of parks, libraries, museums and other public services, the acreage of which may be included as part of the recommended acreage as stated in subsection (a) of this section.

n. The site shall be conveniently located for public services including but not limited to fire protection, police protection, public transit and trash disposal whenever feasible.

o. The district shall consider environmental factors of light, wind, noise, aesthetics, and air pollution in its site selection process.

p. Easements on or adjacent to the site shall not restrict access or building placement.

q. If the proposed site is on or within 2,000 feet of a significant disposal of hazardous waste, the school district shall contact the Department of Toxic Substances Control for a determination of

whether the property should be considered a Hazardous Waste Property or Border Zone Property.

The District also requests the Port and the EIR consider and include appropriate analysis of the rail operations issues described in Education Code Sections 17212.2 and the hazardous materials requirements of Public Resources Code Section 21151.4 and 21151.8.

Hazardous Air Emissions

1. The Initial Study indicates that the proposed Project would divert truck traffic using nearby local freeways (e.g., 710 Freeway) to a facility in closer proximity to the Port, which would ease traffic conditions on local freeways and reduce air quality impacts. While the proposed Project may achieve a positive overall environmental impact for the region as stated in the Initial Study, the proposed Project would substantially decrease localized air quality for the nearby population, including school population, in the Project area. The proposed Project would place more traffic on local roadways, primarily on Pacific Coast Highway. In addition, the District anticipates that the increased efficiency of the loading and transport freight operations at the Port will lead to additional ship, train, and vehicle trips, thereby increasing the related air pollutant emissions. Therefore, the EIR should identify all hazardous air emission sources and their impacts on the school population, including the proximity of District school facilities to the potential emission sources. Specifically, the EIR should consider the following issues:

1a. The EIR must clarify how any additional vessel traffic resulting from the proposed Project would be mitigated and describe how vessel traffic would be monitored. The Initial Study states that the proposed Project would not result in changes in vessel traffic levels or patterns to create substantial safety risks. However, the District believes that increases in the processing of freight would lead to accepting more freight from additional ships. If it is determined that the proposed Project may lead to additional ships utilizing the port facilities, air pollutant emissions from these additional ships must be accounted for in both the emissions inventory and health risk analysis. The EIR must describe how potentially improved handling of containerized cargo would improve vessel traffic flow and identify how it relates to the emissions. (We suggest you review a recent Court of Appeals case on the relationship between infrastructure sizing and its impact on growth. *See Laub v. Davis*, 2005 DJDAR 12079 (October 7, 2005)).

1b. The EIR should include a health risk analysis that considers the potential health impacts from both the exterior and interior exposure of students to train related emissions in combination with existing port emissions. The proposed Project would involve an increase in the use of trains along the Union Pacific Railroad (UPRR) to transport freight as opposed to trucks. In addition, the proposed track extension would locate emission sources closer to the existing schools. Therefore, the healthrisk analysis performed for the Project needs to consider the both the exterior and interior exposure of students.

1c. The EIR must include a health risk analysis that evaluates the potential health risk for all sources that may potentially affect the health of the students within the District including appropriate air dispersion modeling (as described in Education Code Section 17213(c)(2)(C)). The proposed Project has the potential to increase localized concentrations of air pollutants In the vicinity of the Project site. Though Project-related air pollutant concentrations will be evaluated within the technical studies conducted under CEQA, the District is concerned about the cumulative effects of air pollutant concentrations on the health of the students at District schools. The California Air Resources Board's *Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach* states that there are already significant health risks associated with existing port related air pollutant concentrations. The District is concerned that the Project would degrade the air quality conditions at District schools.

1d. The EIR must include a health risk analysis that evaluates potential impacts on indoor air quality at the District's school facilities and whether the use of High Efficiency Particulate Air (HEPA) filter systems at District schools would improve indoor air quality. The District is concerned that air pollutant concentrations may adversely affect the indoor air quality at District schools.

1e. The EIR must include an evaluation of how the potential construction of gymnasiums/multipurpose room with HEPA filter systems could improve the air quality of students and faculty. The provision of gymnasiums/multipurpose room would provide an alternative to exercising outside where air quality is considered poor due to the Port and Port of Long Beach being the largest single source of PM^{10} within the south coast air basin. The provision of gymnasiums/multipurpose room as mitigation measures is essential because children and the elderly represent the most vulnerable segment of our population and children have higher respiratory rates due to their level of physical activity.

1f. The California Air Resources Board (CARB) has published the *Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach*. This Study has identified current operations at the Ports of Long Beach and Los Angeles as major sources of PM10. It also stated "Growth forecasts predict that trade at the POLA and POLB will triple by 2020, resulting in a 60 percent increase in diesel PM emissions from current levels unless further controls are enacted." This increase in emissions and associated health risk due to the increased port activities must also be evaluated within the EIR.

1g. The proposed Project may expose District students and staff to unhealthful air quality conditions. We request that the Draft EIR address these serious concerns and identify specific mitigation measures to reduce all such impacts to less than significant.

Noise and Vibration Impacts

2. The EIR must include noise and vibration evaluation at each of the school sites potentially impacted by the proposed Project. The existing schools currently experience extensive noise from trains (especially along the San Pedro Branch line that extends along the eastern boundary of the Project site) and trucks associated with the existing industrial activities. The increased number of train and vehicle trips would contribute to the increased noise and vibration impacts for the existing schools. The typical approach for the assessment of noise uses a 24-hour CNEL noise metric which averages noise levels from train activity with periods of no train activity over a 24-hour period. This approach would understate the impact of train noise which is most evident during single train passings. The noise impact assessment should evaluate the noise impact from single train events and not be averaged with periods of no train activity. This single event train noise impact assessment needs to include a discussion of how train noise would result in speech interference at 45 dBA Leq. Increasing the frequency of train operations may lead to a greater number of occurrences of interference of speech intelligibility of students and faculty. This increase in noise may restrict the District's ability to expand and improve the existing schools. Noise analysis should identify these sensitive receptors and evaluate site specific impacts and mitigation for each school. The EIR should identify all feasible mitigation measures necessary and appropriate to reduce noise and vibration impacts to any of the District's school facilities potentially impacted by the Project.

3. The noise impact evaluation also needs to consider potential mitigation measures such as a perimeter sound/barrier wall along the Terminal Island freeway at Hudson to protect the site from noise, traffic, and viewing activities at the facility. Other types of mitigation measures that should be considered are removal of at-grade crossings between the railroad and streets, use of quadgate railroad crossing systems, trenches to reduce vibration impacts, construction of gymnasiums to provide a quiet athletic environment and structural acoustic improvements at schools.

Traffic and Transportation:

4. In page 34 of the IS, it is indicated that the proposed Project might result in the increased use and traffic on the existing streets in the Project area, which could increase hazards at pedestrian crossings in the vicinity of the District's schools. These crossings are already very busy and pose potential safety hazards to the District's students. The increased traffic from the Project may create potentially significant impacts because the proposed Project would exacerbate the current situation. Further degradation of the current hazardous condition would constitute a potentially significant impact. The traffic study should identify existing and future hazardous intersections in the Project vicinity and conduct proper analysis.

Public Health & Safety:

5. The EIR should identify any high-pressurized gas or liquid petroleum lines within the Project site and evaluate the risk of rupturing. The District is concerned about the high pressure gas or liquid petroleum pipelines within the railroad easements in the Project vicinity. The District is concerned that the overall increase in rail traffic would also increase the probability of derailment and pipeline rupture.

6. The EIR should identify potential safety risks related to transport/handling of hazardous materials such as potential for spill, release, leak, and explosion in case of derailment or accident. The District anticipates that an increase in rail usage would also increase the quantity and volume of hazardous materials being transported to and from the Project site.

7. The EIR should identify any overhead or underground transmission power lines above 50 kV. The District is concerned with the current and future electric power sources in association with the EMF effect. The EIR should also identify any plans for relocation, construction, and/or any proposed voltage increase for existing transmission lines.

Cumulative Impacts:

8. The EIR must include a cumulative impacts analysis. The District is concerned about the cumulative effects of the air, traffic, noise, and public health and safety issues related to the Project. While these impacts may be less than significant individually, they may be significant cumulatively.

9. Analysis of cumulative projects must include local development as well as general and anticipated growth within the Project area. The District is concerned that the proposed Project would have compounding effects that extend beyond the defined Project and area. The EIR cumulative impact analysis must consider the Project's growth inducing impacts and associated public health and safety issues that are reasonably anticipated as result of the proposed Project and potential future impacts the Project may have on the District's ability to construct additional school facilities and/or expand existing school sites.

General:

10. The EIR should include a figure (or figures) that shows general locations for all major Project construction and improvements including, but not limited to, all new tracks (e.g., tracks for transfer of marine containers & additional BNSF tracks), fueling areas, a truck in/out gate, etc. Please clarify the Area of Less Frequent Train Movements as shown in Figure 2, Project Site Area. It is uncertain what the Area of Less Frequent Train Movements represents; if that is the area where additional rail tracks are being proposed, please label as such.

11. The significance determination and the analysis must be consistent throughout the Initial Study. There are a number of instances where the Project impacts are called Less Than Significant but it is stated that these impacts will be discussed in the EIR. Where an impact analysis cannot be substantiated in the Initial Study, these impacts should be considered Potentially Significant and further discussed in the EIR. For example in Section VII(b), Hazards and Hazardous Materials, the impact was determined to be less than significant because an Emergency Response Plan and Health and Safety Plans would be developed and these plans are expected to remedy any dangers associated with an upset or accidental release of hazardous materials. However, the Initial Study states that the adequacy of these plans and measures will be addressed in the EIR. If adequacy of these plans could not be substantiated, the impact should be considered Potentially Significant and properly evaluated in the EIR.

12. The EIR must evaluate the impacts of displacing the existing owners/lessees as result of the consequential relocation of Cal Cartage. Notwithstanding the fact that the currently proposed location for the Cal Cartage operation would create greater distance between Cal Cartage and the nearby schools, the displaced industries may move closer to the schools or have other impacts. The EIR must identify all direct and indirect impacts of Project implementation, including cumulative impacts of these displacements.

13. The EIR must include an adequate analysis of Project alternatives including, but not limited to potential alternatives to truck and rail traffic routing as it relates to offsetting any potential impacts to the District's school facilities, students or staff.

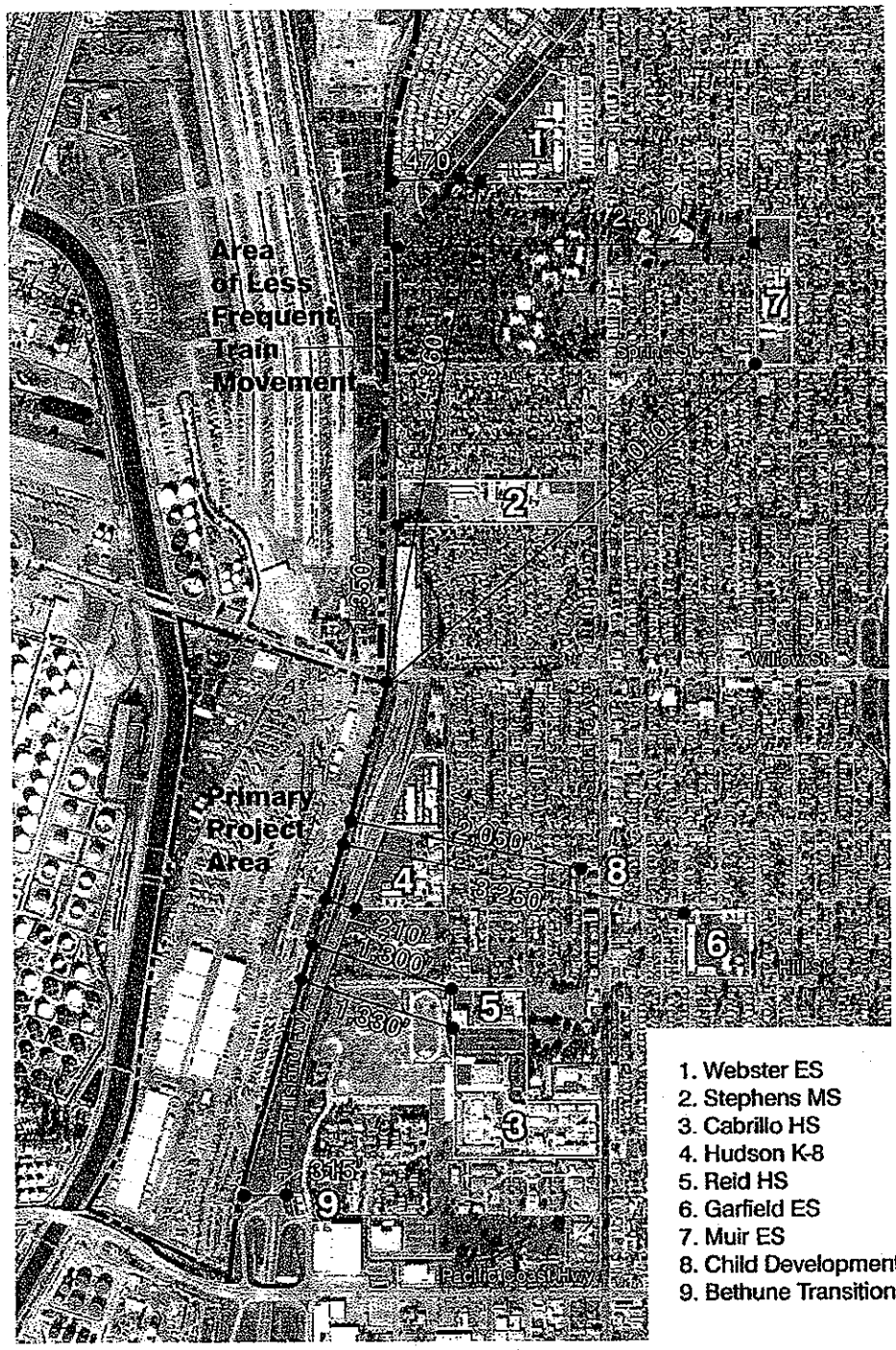
Thank you for the opportunity to respond to the NOP and we would like to be included on the mailing list for all future notices and documents pertaining to this Project. The District looks forward to reviewing the EIR when it is released for pubic review. The District would also be happy to meet with the Port and its consultants to discuss the impact of the Project on the District's facilities, students and staff and potential mitigation measures to offset such impacts. The District trusts that the Port and the District can resolve all school facility, student and staff health and safety concerns in a collaborative manner. Please send one complete set of the DEIR to me at the above address when it becomes available. If you have any questions or would like to meet to discuss our concerns, please feel free to contact me at (562) 997-7550.

Sincerely,

Carri Matsumoto
Executive Director
Facilities Development and Planning
LONG BEACH UNIFIED SCHOOL DISTRICT

cc: Chris Steinhauser – LBUSD
Kim Stallings – LBUSD

Figure 1



1. Webster ES
2. Stephens MS
3. Cabrillo HS
4. Hudson K-8
5. Reid HS
6. Garfield ES
7. Muir ES
8. Child Development Center
9. Bethune Transitional Center

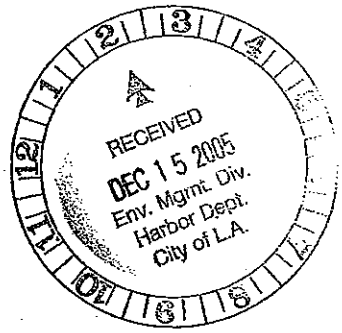
NOT TO SCALE

CITY OF LONG BEACH

DEPARTMENT OF PLANNING & BUILDING

333 W. Ocean Blvd. 7th Floor Long Beach, CA 90802 (562) 570-6357 FAX (562) 570 -6068

COMMUNITY & ENVIRONMENTAL PLANNING



December 14, 2005

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

RE: Southern California International Gateway (SCIG)
Comments on Supplemental Notice of Preparation

Dear Dr. Appy:

The City of Long Beach has reviewed the Supplemental Notice of Preparation (NOP) on the proposed Southern California International Gateway Project (Case ADP#041027-199) and has the following comments to provide in accordance with Section 15082 of the California Environmental Quality Act (CEQA) Guidelines. In addition, at the City Council's request, staff collected comments from the public regarding the SCIG NOP at two public meetings. These comments are attached and we would like you to consider them in preparing your environmental analysis and add the speakers to your mailing list.

Project Description

The project description does not accurately reflect the full extent of the proposed project and therefore it is difficult to respond to the Supplemental NOP. The project description provided in the NOP is a general discussion of "new technologies" intended to achieve the Port's Rail Policy, Project Objectives consistent with this Rail Policy, and a list of six Project Elements that outline various types of site structures and infrastructure to be either demolished or constructed.

The NOP provides no information or description related to the activities occurring at this site such as:

- Projected number of containers and trucks entering and exiting the site
- The projected hours of operation and activities occurring on the site
- The location and placement of buildings, uses and activities on the site
- Identification of new technologies to be utilized at the site
- Identification of all anticipated primary facility operators on the site
- Identification of all property owners by property address or Assessor Parcel Number
- Interrelationship of project operations with other near-dock operators, including ICTF

operations
- Discussion of the alternative delivery systems and optional access routes contained in the Additional Assessment on page A-6

The NOP refers to the 27 acre area south of Pacific Coast Highway as "additional project features outside of the Primary Project Area" and is not included as part of the project description. This area is in fact an integral part of the project and must be included in the project description. According to page A-3 of the NOP, this area is serving as a corridor for rail leading into the project. In order to accomplish this, existing buildings would have to be demolished, at grade or grade separated crossings would have to be constructed and additional infrastructure is necessary to facilitate the project. None of these elements are identified in the NOP or project description. The NOP and project description must identify all the physical and functional changes.

The project area boundaries should therefore include and accurately identify all areas that are an inseparable part of the project improvements and operations proposal. Dividing the project into separate areas without a full acknowledgment of project components outside the designated project area could constitute a piece-mealing of the project area under CEQA.

Project Objectives

The Project Objectives are deficient in the following areas:

- **Over-emphasis on near-dock intermodal facilities**
  Three of the five Project Objectives focus on a near-dock facility. This restricts consideration of a reasonable range of alternatives that could achieve broader cargo movement goals while lessening environmental impacts, including on-dock rail usage and other alternative locations.

- **Exclusion of alternative fuels, alternative delivery systems and optional access routes**
  The new fuels and technologies listed on pages A-1 and A-2 are only discussed as features the rail operator is either "planning to incorporate" or "investigating" usage. The Additional Assessment on page A-6 list possible clean fuels, alternative delivery systems (i.e., magnetic levitation) and optional access to the project site (i.e., direct access from the Terminal Island Freeway). Excluding these features from the project description and project objectives creates ambiguity on the Port's level of commitment.

Required Entitlements

Identify all governmental entities responsible for project review and approval. Fully describe all entitlement approvals required for the project as proposed.

The Long Beach portion of this project site is in the IL Light Industrial zoning district and has a General Plan Land Use Designation of LUD No. 9R Restricted Industry. The following discretionary approvals would be required from the City of Long Beach:

- **Conditional Use Permit** to establish any transportation-related land uses in the IL District, including warehousing, storage, terminal facilities, and freight/cargo transportation
- **General Plan Amendment** to redesignate the project site from LUD No. 9R Restricted Industry to LUD 9G General Industry (the LUD No. 9R General Plan District does not permit any outdoor or environmentally impacting industrial operations)

Light and Glare Impacts

The Environmental Checklist and Impact Analysis identifies exterior operational lighting as a potentially significant impact to sensitive receptors located in residential areas to the east of the Project Area. The EIR must therefore provide the following information:

- An analysis of potential light and glare impacts to properties in West Long Beach, with particular emphasis on impacts to sensitive receptors such as residential neighborhoods, nearby schools, churches, shelters, and medical land uses
- Identification of possible mitigation measures, including glare shields and reduced nighttime hours of operation

Air Quality Impacts

As stated on page 9 of the Environmental Checklist, project operations could "result in permanent increased air emissions at and near the site due to an increase in rail and truck traffic traveling to and from the area." According to the South Coast Air Quality Management District (SCAQMD), the Port and nearby areas have the highest cancer risk rates in the Los Angeles metropolitan region, due in part to truck-related diesel emissions.

The air quality analysis should address the conclusions from the following recent studies in relation to project impacts:

- City of Long Beach Baseline Air Quality and Noise Human Health Risk Assessment, approved by the Long Beach City Council on May 24, 2005
- SCAQMD MATES II and MATES III studies
- California Air Resources Board study on diesel particulate matter exposure in the Ports (Diesel Participate Matter Exposure Assessment for the Ports of Los Angeles and Long Beach, draft, October 2005).

The EIR air quality impact analysis should include the following:

- Construction-related air quality impacts from both off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips)
- Operation-related air quality impacts from both on-site operations (e.g., container handling equipment) and off-site vehicular trips (e.g., worker vehicular trips, container truck trips)
- Average and maximum daily on-site operations emissions by pollutant type using

current technologies (i.e., diesel-powered delivery systems)
- Comparison of anticipated operational emissions between diesel powered and alternative non-diesel powered delivery systems
- A Human Health Risk Assessment on pollutant emission impacts to adjacent residents and sensitive receptors in West Long Beach for both diesel and non-diesel powered systems
- All applicable mitigation measures listed in the SCAQMD Air Quality Handbook

Hazards and Hazardous Materials

As noted on page 21 of the Environmental Checklist, the proposed project is directly across the Terminal Island Freeway from Reid High School, Hudson School and Bethune Program for the Homeless (school for homeless children), each of which is within a quarter mile of the project site.

The EIR hazards and hazardous materials analysis should include the following:

- Determination of whether any current or historic uses at the project site have resulted in the release of any hazardous wastes or substances in the project vicinity, particularly in relation to nearby residential areas in West Long Beach
- Identification of any known or potentially contaminated areas within the project site
- A Human Health Risk Assessment on soil and groundwater contamination, with particular emphasis on impacts to residents and sensitive receptors in West Long Beach
- Mitigation measures that are in full compliance with all notification and remediation procedures set forth by the California Department of Toxic Substance Control (DTSC) and the Regional Water Quality Control Board

Land Use and Planning

As previously discussed, the project area portion located within the City of Long Beach would require approval of a Conditional Use Permit and General Plan Amendment. Therefore, the project as proposed would conflict with an applicable land use plan and Environmental Issue IX.b. should be identified as a Potentially Significant Impact in the EIR.

The EIR land use impact analysis should include the following:

- Comparison of the proposed project operations on the Long Beach portion of the project site with the permitted land uses as set forth in Case No. 9501-12, approved by the Long Beach Planning Commission in July 1995 for the truck parking land use
- Discussion of any inconsistencies between the proposed project and all applicable local and regional plans, including the Regional Comprehensive Plan and Regional Transportation Plan by the Southern California Association of Governments (SCAG).

Noise

The discussion on page 30 of the Environmental Checklist acknowledges that "the proposed

intermodal facility would increase truck and rail trip generation in the area, which could change or increase traffic noise in the area. Operation of the proposed intermodal facility could also result in noise from the use of on-site heavy equipment."

The EIR noise impact analysis should include the following:

- Identification of potential noise impacts associated with both project construction and operations, particularly in terms of potential impacts to residents and sensitive receptors in West Long Beach
- Identification of mitigation measures, including technological improvements on noise muffling equipment, strict adherence to exterior noise level limitations as set forth in Chapter 8.80 (Noise) of the Long Beach Municipal Code, and limiting hours of operation to daytime hours only.

Population and Housing

While the proposed project would not induce substantial population growth, there could be substantial displacement of people and housing units due to the negative environmental effects associated with air, noise, traffic and other adverse physical impacts generated by the proposed project. Therefore, Environmental Issue XII.c. should be identified as a Potentially Significant Impact in the EIR.

The EIR population and housing impact analysis should include the following:

- A thorough analysis on the project's economic and social effects on the surrounding physical environment in accordance with CEQA Guidelines Section 15131.
- Discussion of the project's potential for physical deterioration to nearby residential neighborhoods and commercial areas through declining property values, causing a ripple effect of store closures, long term vacancies and urban decay in West Long Beach.
- Mitigation measures to lessen urban decay impacts to West Long Beach, including limited operational capacity and alternative project locations

Public Services

Although the Environmental Checklist did not identify any potential significant impacts to public services, the project could impact emergency service delivery and response times to nearby communities. Therefore, Environmental Issue XIII.a. should be identified as a Potentially Significant Impact for fire, police and school services.

The EIR public services analysis should thoroughly address the following:

- Analyze project impacts to police and fire service staff resources
- Analyze project impacts on emergency service response routes and response times to nearby neighborhoods
- Analyze project impacts to nearby schools, particularly in terms of local intersection levels of service

Transportation/Traffic

As discussed on page 36 of the Environmental Checklist, increased vehicular movement on nearby arteries would occur during project operations "due to an increase in truck traffic to and from the facility." In addition, the proposed project "could result in traffic exceeding a level-of-service standard for congestion management program intersections in the Port area."

The EIR transportation/traffic impact analysis should examine the following factors:

- Identify all intersections and corridors potentially impacted by project truck travel patterns, particularly along Willow/Sepulveda
- Provide Intersection Capacity Utilization (ICU) calculations for all nearby intersections within the City of Long Beach and Highway Capacity calculations for all State roadways in the project vicinity (i.e., Pacific Coast Highway)
- No credit should be taken for any assumed reductions in existing traffic volumes on surrounding freeways or major arterials, since Port economic growth could replace or add more truck trips than anticipated to be reduced from this project
- Account for the high percentage of project truck trips through the use of passenger car equalivents in order to provide a meaningful level of service analysis at both traffic signals and roadway segments with significant grade differentials
- Examine project impacts on Pacific Coast Highway east of the project site, especially during the PM peak period
- Analyze project site entrance operations (capacity vs. anticipated demand) to determine the required on-site queuing capacity necessary to prevent impacts to the public street network
- Analyze on-site truck turning movements to determine if sufficient space is allocated for complex movements, including on-site U-turns (particularly if truck entry and exiting would be from Pacific Coast Highway only)
- Analyze the impact of relocating truck support services currently provided on-site and the loss of on-site truck and trailer parking
- Address parking impacts resulting from the loss of existing on-site parking spaces for trucks and trailers and the anticipated increase in worker and truck parking demands from project operations
- Fully describe all anticipated rail modifications and relocations in the South Lead Track Area and all other industrial facilities in this Area
- Analyze potential impacts to emergency services response routes and response times to the project area and nearby areas resulting from at-grade track improvements in the South Lead Track Area
- Analyze alternative access routes to the project, including a direct connection with the Terminal Island Freeway

Alternatives

CEQA requires EIRs to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic project objectives while avoiding or substantially lessening significant environmental impacts, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.

CEQA Guidelines Section 15126.6(f)(2)(A) states that in regard to alternative project locations, "(t)he key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." In addition, a reduced size project alternative should be included to determine if a smaller project could attain most of the project objectives while reducing environmental effects.

The Supplemental NOP provides the following alternatives:

- **Preferred Alternative (Proposed Project)**
  Classifying the proposed project as the Preferred Alternative implies a foregone conclusion prior to EIR analysis of a reasonable range of alternatives and public disclosure of the reasoning for alternative selection.

- **Alternative 2: Double-ended Track Design**
  Alternative 2 as described in the Supplemental NOP is similar to the proposed project in terms of operations. However, Alternative 2 would employ the use of rubber tire, diesel-powered gantry cranes for both train loading/unloading and container stacking activities while the under the proposed project (Alternative 1), all-electric cranes would be used for rail and container stacking activities.

  Alternative 2 is therefore less environmentally friendly than the proposed project. Since the purpose of considering a range of project alternatives is to lessen environmental impacts while attaining most of the basic project objectives, this alternative fails to meet the basic criteria of a project alternative under CEQA.

- **Alternative 3: Alternative Site Location**
  This Alternative was added to the Supplemental NOP with only one sentence stating: "A siting study will be performed to determine feasibility of other site locations and these will be assessed as appropriate."

  A siting study is not necessarily an alternative location analysis. It is unclear what is meant by "determine feasibility of other site locations." Is feasibility related to meeting project objectives, lessening environmental impacts, or both?

  Alternative locations analyzed in the EIR should at a minimum include an on-dock location and a near-dock location further to the west of Long Beach neighborhoods.

- **Additional Assessment**
  Based on comments received at the two October scoping meetings, alternative clean delivery systems and optional new access routes to the project site have been added to the Alternatives description on page A-6. These are project modifications which could significantly lessen environmental impacts and should be incorporated into the project description rather than considered part of the alternatives analysis.

At a minimum, the EIR should include the following alternatives with sufficient information to allow meaningful evaluation, analysis, and comparison with the proposed project:

- **On-Dock Alternative Location**
  This Alternative would provide the greatest reduction in the most significant environmental impacts to nearby residential neighborhoods and other sensitive receptors in regard to air, noise, traffic, and nighttime lighting impacts as well as potentially reducing freeway traffic impacts. The broad project objectives not directly related to near-dock facilities would also be met by this alternative (increase use of Alameda Corridor, manage Port growth, and promote improvements consistent with the Goods Movement Initiative). Therefore, this Alternative would be the **Environmentally Superior Alternative** other than the No Project Alternative.

- **Near-Dock Alternative Location**
  This Alternative would locate project activities close to the Ports but further from residential neighborhoods. Aerial maps of the surrounding area clearly show an abundance of rail lines on nearby sites between Terminal Island and the proposed project site (as well as potential project areas along or near Alameda Street in the Carson area between Lomita Boulevard and the 405 freeway). An alternative near-dock facility in this area would lessen environmental impacts to residential areas and on the 710 freeway, although localized impacts in terms of air, noise, traffic and nighttime lighting could be significant. This Alternative could also meet all five Project Objectives.

- **Reduced Project Alternative**
  This Alternative would be a reduced scale version of the project at the same proposed location. As such, localized project impacts related to air, noise, and traffic would be proportionally reduced although nighttime lighting impacts could be similar to the project as proposed. A Reduced Project Alternative could also meet all five Project Objectives.

Cumulative Impacts

The Cumulative Projects List should include the following nearby projects:

- ICTF Expansion Project
- LNG facility in the Port of Long Beach Pier T
- Port of Long Beach Pier B rail yard project
- All other proposed projects in the Ports and nearby industrial areas

Since the project area is located in an extreme non-attainment area for ozone, oxides of nitrogen and reactive organic gases, the project's incremental effect on air quality would be considered cumulatively considerable and an **unavoidable significant cumulative impact.** The project should therefore include features that would reduce emissions, particularly diesel emissions, to reduce air quality impacts to the greatest extent possible. Therefore, the project design features listed on pages A-1 and A-2 of the NOP should be fully incorporated into the project as required components rather than uses to be investigated.

Mitigation Measures

Required mitigation measures for any near-dock project location should include the following:

- Sustainability and green Port improvements on at least the same level of commitment as the Port of Long Beach Green Port Policy
- Design features to eliminate the use of diesel-powered railroad switch engines, diesel-powered yard hostling trucks, diesel-powered cranes, and other diesel and high polluting fuels from all truck and rail equipment operations
- Incorporate automatic idling reduction devices to all locomotives
- Incorporate the alternative delivery systems and optional access routes described on page A-6 of the Supplemental NOP

City Council Comments

At their regular December 13, 2005 meeting, the Long Beach City Council stated that if project generated environmental impacts to Westside residents could not be adequately mitigated, the City Council would oppose this project.

All questions regarding this environmental review process should be directed to either myself at (562) 570-6357 or Craig Chalfant, Environmental Planner, at (562) 570-6368.

Sincerely,

Suzanne Frick
Director of Planning and Building

For attachments please see NOP Comment 1 page 69-85.

USC
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CALIFORNIA

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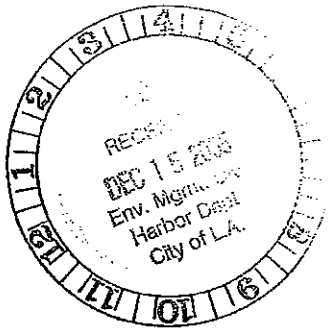
University of Southern California

Division of
Environmental Health

Department of
Preventive Medicine



December 14, 2005

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

Re: Comments on the Notice of Preparation (NOP) (dated September 19, 2005) and Supplemental NOP (dated October 31, 2005) for the proposed Southern California International Gateway (SCIG) Project to be operated by BNSF Railway

Dear Dr. Appy:

We submit these comments on the proposed Southern California International Gateway (SCIG) Project on behalf of the Community Outreach and Education Program of the Southern California Environmental Health Sciences Center, based at Keck School of Medicine of the University of Southern California.

Our Center is composed of scientists from USC and UCLA, many of whom conduct air pollution research. Our USC investigators have been conducting a decade-long study (known as the Children's Health Study) of the health effects of air pollution on the respiratory health of school children. Findings from this study 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. These comments from our Center's Community Outreach and Education Program are submitted with these scientific studies - and dozens of other air pollution health investigations - in mind. These and other relevant studies of air pollution's effects on health are included on a CD submitted with this letter. (See Appendix A, List of References, and Appendix B, Full Scientific Articles on Compact Disk, CD).

As discussed in greater detail below, we have serious concerns about the potential health impacts of this project on residents and school children who live, play, and learn in close proximity to the planned intermodal container transfer facility. Our concerns relate to the anticipated increase in air pollution from the additional mobile sources the rail yard will introduce or

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attract to the area: big-rig trucks, yard equipment, locomotives on-site, Alameda Corridor locomotives, and locomotives operating along the San Pedro Branch tracks. The communities near the proposed rail yard are densely populated, contain many schools and other "sensitive receptor" facilities, including a homeless shelter and a school for homeless children, and they are already heavily impacted by the Port, Port traffic to and from the existing Union Pacific Intermodal Container Transfer Facility (ICTF), and nearby refineries. We believe that the additional health impacts related to air pollution and noise from the proposed SCIG project on nearby residents are significant and must be fully mitigated, adding no additional health burden, if the Port of Los Angeles continues to consider siting the SCIG project at the proposed location.

As background, a recent document by the California Air Resources Board entitled "Emission Reduction Plan for Ports and International Trade in California" states the following concerns:

> "...People living in communities with high pollution burdens [are a group] that is of particular concern when assessing the impacts of goods movement-related emissions. Sensitive groups, including children and infants, the elderly and people with heart or lung disease, can be at increased risk of experiencing harmful effects from exposure to air pollution. People living in communities close to sources of goods movement-related emissions, such as ports, rail yards, and inter-modal transfer facilities are likely to suffer greater health impacts and these impacts will likely add to an existing health burden." (p. A-22) ...
>
> "Many of these communities are made up of people from economically disadvantaged groups who would be least able to sustain the personal and financial impacts related to increased disease burden". (p. A-8)

The residents and school children living near the proposed SCIG project comprise a group "with a high pollution burden" (as described above) and many members of the population are both economically disadvantaged and minority (full demographic data for the three most heavily affected zip codes is attached as the final appendix).

Because we believe that the potential health impacts of the SCIG Project would be so detrimental, we respectfully request that the Los Angeles Harbor Department:

a) Investigate whether increased efficiencies of on-dock rail at both the Ports of L.A. and Long Beach would negate the need for this new facility. Increasing the efficiency of on-dock rail is specifically called for by the August 2005 Los Angeles Harbor Department Rail Policy, as well as the California Air Resources Board's Draft Emission Reduction Plan for Ports and International Goods Movement, p. III-50, which can be found at http://www.arb.ca.gov/planning/gmerp/gmerp.htm.
b) If on-dock rail is fully investigated and determined to be infeasible, search for alternative sites on which to build a new intermodal container transfer facility that can service the Alameda corridor with less significant public health impacts on nearby residents.
c) If an alternative site for a new ICTF is fully investigated and determined to be infeasible, and if the SCIG project moves forward, implement enforceable mitigation measures including use of the most innovative technology to reduce air pollution from the new rail yard, the trucks or other delivery system entering and leaving it, and the locomotives entering and leaving it on the San Pedro Tracks as well as on the Alameda Corridor in order to ensure protection of the health of residents in Wilmington, Carson, South Los Angeles and West Long Beach. This would include:

- Implementing non-diesel delivery systems for containers entering or leaving the SCIG. If the rail yard continues to be considered in lieu of preferable on-dock rail, it must be virtually "clean," adding no additional air pollution to the area. As the supplemental NOP indicates, the EIR must investigate alternative delivery systems such as magnetic levitation, electric conveyor belts, and other innovative non-diesel technology to move containers and reduce pollution. The EIR should also investigate non-diesel trucks, including having a dedicated fleet of electric or hybrid trucks or alternative fuels. A dedicated fleet of non-diesel/alternative fuel/electric trucks could be certified by the Port to carry containers back and forth between the rail yard and the Ports, with a requirement for them to meet strict entry requirements to enter either the SCIG or the Ports.
- Electrification of trains on the Alameda Corridor and Alameda Corridor East, as recommended in the No Net Increase Report, as well as electrifying the switching locomotives that will be doubling back and forth on the San Pedro line very close to homes and schools along their tracks.
- Implementing and enforcing all feasible mitigation measures if the SCIG project goes forward.
- Implementing all rail and trucking measures recommended in the No Net Increase Report, all measures in the 2005 California Air Resources Board (CARB) Railroad Memorandum Of Understanding, and any railroad/trucking/yard equipment rules of CARB or the South Coast Air Quality District (AQMD).

Detailed comments follow.

1. The EIR must address the existing physical environment in the vicinity of the proposed project to assess the significance of the impacts the new SCIG project will create, and must detail the full range of activities that will be generated by the project.

Although the current use of the land where the SCIG is proposed is "industrial," its impact on the surrounding community is minimal compared to what would occur with the SCIG. Baseline noise, air pollution, vibration and lighting must be evaluated. Currently, there is insignificant truck traffic on a daily basis in and out of the existing Cal Cartage facility (compared, for example, to the hundreds of trucks going in and out of the nearby Union Pacific ICTF), which is important to document because the SCIG would add a significant amount of new traffic and air pollution to the area. In addition, traffic counts on the nearby roads and freeways must be done in order to assess the current volume and the increased volume of trucks that will travel through the nearby communities if the SCIG is built. Finally, the impacts of emissions from thousands of diesel trucks a day queuing and operating inside the SCIG project must be evaluated regardless of the route the trucks take to reach the SCIG.

Specifically, the EIR must describe the following, which the SCIG NOP fails to describe:

- anticipated size of the SCIG
- number of lifts expected annually at start of project and maximum allowed over time
- number of trucks anticipated to enter the yard per year at start of project and maximum over time

- number of switching locomotives to be permanently on site at start of project and maximum over time
- number and types of cargo handling equipment to be on site and maximum over time
- number of locomotives that are anticipated to travel on the San Pedro tracks at start and maximum over time
- number of additional locomotives anticipated to be added to the Alameda Corridor at start of project and maximum over time
- where on the site the trains will "connect to" the Alameda Corridor
- where the "Haz Mat area" of the site will be (not included in the NOP maps)
- what actions BNSF or the Port plan to take to ensure that the system of delivery for containers coming to the facility does not bring additional pollution to the nearby neighborhoods, and
- what actions BNSF or the Port anticipates taking to ensure that the locomotives coming and going from the facility will not add additional pollution to the nearby communities.

2. The EIR must consider concurrent and future related projects, including the relocation of Cal Cartage and the expansion of the adjacent Union Pacific (UP) Intermodal Container Transfer Facility (ICTF).

The Supplemental NOP makes numerous mentions of Cal Cartage and other tenants and their plans for moving to a new area. It would seem appropriate for these companies to do their own EIR rather than "piggy-back" on the SCIG EIR. The Supplemental NOP states (p. 6) that there are residential land uses immediately to the East of the proposed site for Cal Cartage that may have adverse impacts. If a separate EIR is not warranted, then there must be much more specific information about Cal Cartage (and other affected property owners/lessees) activities in the SCIG EIR. E.g., future "warehousing activities" at Cal Cartage described in the NOP may introduce more trucks to the area than does existing use of the land by Cal Cartage and others; this needs to be evaluated.

Additionally, the EIR must address the future (and possibly simultaneous) expansion of the UP-ICTF, located adjacent to the proposed SCIG site. The UP ICTF currently brings hundreds of thousands of trucks a year into the very same community that will be affected by the trucks, yard operations, and locomotives at the SCIG if it is built here. Any expansion of the UP ICTF should be discussed in the SCIG EIR because of the related, additional health impacts associated with increased operations in the community that will be all the more serious due to the cumulative nature of the effects.

3. The EIR must detail what is already known about local air pollution and health risks in the area, including studies that have been done at Hudson School and forthcoming work of the MATES III project, both conducted by the South Coast Air Quality Management District (AQMD) — as well as other studies underway —so that the cumulative effects of this project can be accurately analyzed. The SCIG will add to existing pollution from the Union Pacific ICTF, refineries and other local air pollution sources, and all cumulative

impacts combined must be considered in the EIR. The EIR should evaluate PM_{10}, $PM_{2.5}$, ultrafine particles, elemental carbon, toxic air contaminants (1,3-butadiene, aldehydes, diesel particulate, etc.), NOx and other emissions in the local area, at baseline and emission projections with the SCIG in place.

AQMD Monitoring Studies. Some insights into existing health threats in the area can be obtained by reviewing AQMD reports of measured pollutants at several Long Beach and Wilmington Schools, comparing them to the North Long Beach Station and occasionally to the downtown L.A. monitoring site. One of the schools studied is Hudson School (K-8), of the Long Beach Unified School District. Hudson School is adjacent to the Terminal Island (TI) Freeway, about 1/3 of a mile from the Union Pacific Intermodal Facility, and directly across the TI Freeway from both the San Pedro Train Tracks and the proposed SCIG facility. In fact, the Hudson School playing fields are separated from the TI Freeway only by a chain link fence.

The AQMD has been monitoring selected air pollutants at Hudson and several other schools in Wilmington (Wilmington Childcare Center) and Long Beach (Hudson and Edison Schools) since 1998. The measured pollutants at each site have been compared to each other and to the local AQMD monitoring stations. Monitoring results show that Hudson School routinely has the highest levels of measured pollutants among the schools and stations monitored in the Wilmington and Long Beach areas, a clear indication that children in this geographic area are already seriously impacted by air pollution. AQMD Reports #7, 9, and 11 are attached as examples for the record.

- *PM_{10} measurements.* AQMD Report #9 on sampling during October – November 2003 and Report #11 on sampling during October - December 2004 both conclude: "The current monitoring and previous monitoring studies indicate that PM_{10} and EC concentrations measured at Hudson School site are often higher than the other study sites, and higher than many AQMD network sites for PM_{10}." … "PM_{10} averaged 49ug/m^3 at Hudson School during the study compared to values ranging from 35-39 ug/m^3 at the other sites." Of the seven 24-hour samples taken at Hudson School and reported in Report #9, four were higher than 50 ug/m^3 (the state's 24-hour standard), with the maximum at Hudson for 24 hours of 71 ug/m^3.

  Report #11 also states that: For all [11] studies except the fall/winter 2000 study, the Hudson School site exhibited the highest PM_{10} average…. These trends suggest that Hudson School consistently experiences higher PM_{10} concentrations than elsewhere in the study area."

- *Elemental carbon levels:* Initially, the South Coast AQMD started conducting their measurements at schools in Wilmington and Long Beach because of concerns about petroleum coke dust blowing into the neighborhood from nearby "coke piles." According to AQMD specialists, by the year 2000 the coke piles were in compliance with mandated mitigation measures, including enclosure, and levels of Elemental Carbon (EC) were found to drop from 1998-2000. Since the year 2000, however, the levels of EC have not dropped further, with the Hudson School EC levels significantly higher than at other schools and AQMD monitoring stations in the area. Recent AQMD studies conclude that

mobile sources in the area of Hudson School may now be the dominant factor rather than the coke dust. This is consistent with the increased volume of traffic on the TI Freeway adjacent to Hudson School and the increased diesel-related truck and locomotive activity in the area, including a dramatic increase in "lifts" at the UP ICTF since 1998.

- *Elemental carbon levels during the Port lockout:* A natural experiment occurred during the Port lockout (work stoppage) in the fall of 2002. AQMD conducted sampling during this time and found unusually low levels of elemental carbon during the lockout, when the Port was not operating, with increasing levels as the backlog of ships was unloaded and containers finally headed by truck to the railyards. Please review Appendix E and the attached AQMD reports and note how much higher the levels of elemental carbon were at Hudson School than at other schools in the area. The lockout was from September 29, 2002 – October 9, 2002. In the figures of Appendix E, please note how low the levels of elemental carbon were on October 9, 2002 (less than 4 ug/m^3, much lower than normal fall averages). Also, please note now high the levels of elemental carbon were in mid-November. Reports on the lockout say that it took more than 40 days from the beginning of the lockout for the backlog of containers to be resolved, resulting in much higher truck traffic during this period in November.

  Also note in Appendix E how levels of Elemental Carbon at Hudson School compare during the lockout and during other years of AQMD measurements. The attached AQMD reports (and the graphs in Appendix E) show how much higher the levels of Elemental Carbon (EC) were at Hudson School when there was a huge influx of diesel trucks moving cargo containers after the lockout, compared to the more typical levels in November. We conclude from these various analyses of the AQMD data that the main "driver" of the currently elevated Elemental Carbon levels at Hudson School is diesel exhaust from trucks going to the ICTF and from locomotives at the ICTF and on the San Pedro lines as well as other diesel equipment operating in the area. When there are few trucks on the TI Freeway and the UP ICTF is not operating, there is significantly low Elemental Carbon at Hudson School. When there is lots of activity on the TI Freeway and the ICTF is unusually busy, there is significantly elevated Elemental Carbon at Hudson School.

- *AQMD Report #9* on sampling in October – November 2003 states: "During this study, the average EC [Elemental Carbon] at Hudson School (7.5 ug/m^3) was 50% higher than any other study site."

- *MATES III study.* The AQMD has selected a site east of the Terminal Island Freeway for one of its MATES III monitoring sites. Results from this study must be included in the EIR, along with a description of the findings of any other published studies on the area by the AQMD.

Truck counts. CalTrans apparently does not count traffic on the TI Freeway. On a weekday afternoon in May 2005, south of Hudson School and standing in the community park, we counted 600 big-rig trucks in one hour passing by on the TI Freeway, heading from the Ports to the nearby Union Pacific ICTF. Although not a lengthy study of any sort, the truck count is an

indication of what school students face on a given afternoon in their community. We have noted from numerous trips to the area that trucks often back up where the TI Freeway dead-ends into Willow Street, as they attempt to turn left onto Sepulveda to go to the ICTF. The EIR must conduct truck counting on the TI Freeway at baseline and make projections about the future truck traffic load.

Health Effects Institute Study. Dr. Eric Fujita of the Desert Research Institute (DRI) is conducting a study of air pollution, with measurements being taken in the area of the Cambodian Temple on Willow Street and the Terminal Island Freeway. Results from his study, when published, must be evaluated in the EIR.

4. The EIR must detail the significant health effects that the SCIG project is expected to have on the local community from the addition of thousands of diesel trucks, as well as air pollution from long-haul and switching locomotives and any other pollution-producing equipment used or related to the SCIG.

In particular, we are concerned about the following health-related issues, all of which should be addressed in the EIR. Relevant scientific articles can be found as a list in Appendix A and on the CD in Appendix B.

- *The body of scientific evidence showing 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 (NOx, PM, acid vapor and elemental carbon) are correlated with reduced lung function. In the USC study, three times as many children in North Long Beach, where levels of Elemental Carbon (EC) are high, had reduced lung function than children in less polluted communities. (Gauderman, 2004). The study is important because medical experts believe that reduced lung function is a significant predictor of mortality in the elderly.

  It is important for the EIR to examine the levels of EC at Hudson School, less than .25 miles from the proposed SCIG. During recent fall-winter measurements, the levels were 1 ½ times higher at Hudson than at the North Long Beach station – raising significant concerns about the potential for reduced lung function in this west Long Beach community, even with the levels of elemental carbon currently existing (SCAQMD Rule 1458 reports, 1998-2004, attached).

- *The body of scientific evidence showing that living or going to school in close proximity to busy roads and freeways (that is, close to mobile source exhaust) is linked to asthma and respiratory effects in children, as well as other effects in adults.* (Gauderman, 2005; McConnell, 2004; Brauer, 2002). (Please see Appendix A and submitted CD for related scientific articles and references). The EIR must examine the increased risk of asthma and other respiratory effects from living or going to school in close proximity to busy roads and freeways.

- *The body of scientific evidence showing that elevated levels of particulate*

matter are linked to cardiovascular disease and increased mortality. (Pope, 2002; Jerrett, 2005; Please see submitted CD for these and related scientific articles). In response to the 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." PM_{10} levels are consistently higher at Hudson School than at other sites measured in AQMD studies in the Wilmington/Long Beach area. $PM_{2.5}$ measurements will be collected in the MATES III study of AQMD. These studies on increased cardiovascular disease and mortality from particulate exposure must be reviewed in the EIR.

- *Scientific studies showing that pregnant women who live near busy roads and freeways (and exposed to current levels of air pollution) are more likely to give birth to low-birth weight, premature infants.* (Wilhelm, 2005). (Please see submitted CD for these and related references and refer to pages A-22 of Appendix A of the CARB Emission Reduction Plan for additional discussion of these impacts). Residential areas, including a homeless shelter, are located in the vicinity of the proposed SCIG east of the TI Freeway and also immediately adjacent to the San Pedro tracks north of Sepulveda. Studies cited on the CD must be reviewed in the EIR.

- *Dozens of studies showing increased lung cancer risks among workers exposed to diesel exhaust, including the most recent study on railroad workers.* Based on these studies, diesel was declared a Toxic Air Contaminant in the state of California. (See most recent study by Garshick, 2004) The EIR must evaluate cancer risks that will result from the proposed SCIG, by doing a mandated Health Risk Assessment. The EIR must also review the Health Risk Assessment done by the California Air Resources Board at the Roseville Rail Yard, which showed significant risk of exposure to diesel exhaust for nearby community residents. Since the Roseville Yard is not an intermodal facility, the SCIG EIR must take into account the thousands of diesel trucks that are currently proposed to enter the SCIG. These trucks would not be in the area but for the UP ICTF and the newly proposed SCIG . Harbor Commission President David Freeman, at the NOP Scoping Meetings, made it clear that the trucks must be considered when evaluating the potential risks of this SCIG railyard project; any HRA must also include diesel exhaust cancer risk from the trucks that will be attracted to the facility.

- *Numerous studies have shown that diesel exhaust particles can enhance allergies and allergic asthma.* These studies by scientists at UCLA Medical School (Diaz-Sanchez, Nel, and Saxon) are described in greater detail on pages A20-21 of Appendix A of the CARB Emission Reduction Plan, found on the CD.) The EIR must evaluate the potential for enhancement of allergies and asthma from the diesel exhaust at the SCIG and trucks delivering containers to it.

- *Emerging studies showing the health impacts of breathing ultrafine particles, including neurologic effects.* (Oberdorster, 2002, 2004) Some of these studies are reviewed in the articles by Delfino and Sioutas found on the CD. The emerging data on the health effects of ultrafine particles must be evaluated in the EIR. In addition, exposure studies (Zhu,

2002) showing that ultrafine particles are higher close to freeways must also be examined in the EIR.

- *Studies showing that elevated noise levels are linked to learning issues in the classroom, as well as to cardiovascular disease and other impacts. (Scanberg, 2002) (See this and related references on the attached CD).* The EIR must evaluate the noise levels at baseline and projected and evaluate their effects on residents' health (including cardiovascular disease) and sleep patterns as well as their potential effects on students' learning.

Many of these scientific findings are also described in Appendix A of 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

5. The EIR analysis for the SCIG must assess "the feasibility of an alternative location for the proposed rail facility including consideration of an on-dock alternative" (quotes from Supplemental NOP cover letter signed by Dr. Appy).

We request that the Port of Los Angeles (POLA) carefully investigate why on-dock rail capacity is not being maximized at the Ports, and that the Port of Long Beach (POLB) be requested to do a similar investigation at its Port, since POLB would be using the proposed SCIG facility as well, if it is built. The EIR must, as part of a comprehensive evaluation of an on-dock alternative, address all factors currently constraining greater on-dock use at the ports and identify methods to maximize use of existing on-dock facilities. The EIR should also evaluate Agile Port Systems methods, which could potentially increase throughput 200 to 300 percent, according to a demonstration study by the Center for the Commercial Deployment of Transportation Technologies (CCDoTT) which we witnessed in Long Beach in November 2005. If on-dock rail can be maximized at both Ports, this SCIG facility would potentially not be needed and a more suitable alternative location could be found over time for an intermodal facility – if additional capacity is needed in the future.

The value of on-dock rail in reducing air pollution is clear, according to the San Pedro Bay Ports Rail Market Study, published on April 22, 2004, and authored by the Parsons Transportation Group:

> "Consider that a single container ship may unload 5,000 twenty-foot equivalent units (TEU) to be delivered outside the Port boundaries by a fleet of trucks. Alternatively, the movement of cargo by trains loaded at on-dock ICTFs is an effective method of reducing the truck traffic. Every train that is loaded on-dock can eliminate over 700 truck trips from the highway, and a single ship can generate 5 trains worth of intermodal cargo. That means on-dock rail can potentially eliminate 3,500 truck trips for every vessel call."

From all accounts, however, existing on-dock rail yards at the Ports are not operating anywhere near capacity or with efficiencies. The Rail Market Study goes on to state that on-dock capacity will be allowed to increase in the future only by resolving some current constraints in the operating mode of the yards:

> "The yards are assumed to operate in 2005 in the same mode as they have in the past; in 2010 the rail yards are assumed to increase their hours of operation to two shifts per day; in 2015 the yards are assumed to operate three shifts per day; and in 2020 the yards are assumed to operate three shifts per day and with work rules and practices more in line with Class I railroad facilities instead of the current Pacific Maritime Association policies.

All constraints to maximizing efficiency of on-dock rail must be investigated and solved before building a new rail yard facility so near a residential community with so much additional pollution.

In addition, we request that the Los Angeles Harbor Department's Rail Policy be revisited by the new commissioners. This policy was adopted by the previous Harbor Commissioners last summer with 30 days of public comment, the month before the SCIG NOP was released. The Policy does not preferentially weight on-dock rail over near-dock intermodal facilities (and, we argue, it should, it terms of overall reduction of air pollution); it does not adopt the No Net Increase recommendations on rail, as would have been appropriate; and it does not address reducing pollution from diesel trucks delivering containers to rail yard facilities, which Harbor Commission President David Freeman so vigorously called for at the SCIG NOP Scoping Meeting in October.

6. The EIR analysis must accurately reflect what will happen with traffic on the I-710 Freeway if the SCIG is constructed. It is inappropriate for the NOP to claim that the SCIG will "divert" trucks from the I-710 freeway to the SCIG, thereby reducing pollution. The SCIG is being built for one purpose: to increase the capacity of the Ports to handle escalating cargo volume.

The SCIG is being proposed to increase capacity of the Ports to handle rising international cargo volume. Already, the yards at Hobart/East L.A. are virtually at capacity and more intermodal capacity is needed. Yet the NOP (as well as BSNF comments at the Scoping hearings and other meetings) makes an argument that the rail facility would divert traffic off the I-710 Freeway, thereby reducing truck vehicle miles traveled and reducing air pollution emissions regionally.[1] This does not appear to be supported by the facts. The BNSF rail yard in East L.A./City of Commerce, approached by the I-710 Freeway from the Port, attracts hundreds of thousands of trucks to its facility each year. With the Ports expanding and the other BNSF rail yard near capacity, no reduction in truck trips on the I-710 seems foreseeable. In fact, BNSF is trying to "squeeze" as much capacity out of its Hobart Yard as possible and operate at the fullest capacity possible, which will attract as many, if not more, trucks:

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[1] This same argument (that it would divert trucks off the I-710) was made years ago for the Alameda Corridor:

> "The Alameda Corridor in Southern California is a nationally known rail consolidation project and dedicated freight corridor that will reduce truck trips on Interstate 710 and other Los Angeles corridors" *[Citation: California Department of Transportation Planning Program Jan 12, 1998. Issue Paper #7, p.5.].*

"The Hobart Intermodal Facility is located in City of Commerce of Washington Street near the I-5 and I-710 freeways. The yard occupies approximately 160 acres and has 17 ramp tracks, typically 3,000 feet long, but five of those tracks are train-length (approximately 7,200 feet long). Hobart performed about 1.2 million lifts in 2002. With planned track expansion and satellite storage yards, the facility could reach 1.5 million lifts annually. The BNSF envisions finding layout and operational improvements to squeeze 2 million lifts out of Hobart. Hobart operates 24 hours per day, and 7 days per week throughout the year." *Source: San Pedro Bay Ports Rail Market Study. 4/24/04 Parsons Transportation Group. Prepared for Port of Los Angeles.*

Most important for the EIR to consider is the anticipated increase of air pollution and potential for exposure in the immediate vicinity of the rail yard, an area already severely impacted by Port-related emissions, including from the existing Union Pacific ICTF. The EIR must evaluate the severe health impacts anticipated from adding 1.5 million trucks to the area's existing 1.5 million trucks going to the UP ICTF. The EIR must include measurements of emissions at the UP ICTF or another BNSF facility and develop calculations on the additional emissions to be pumped into the area by the equipment at the SCIG, the trucks along the Terminal Island Freeway, the Alameda Corridor trains, and the San Pedro Track trains/locomotives. It must look at the SCIG's contributions to both local and regional pollution.

7. The EIR must assess the feasibility of non-diesel delivery systems for transporting containers between the Ports and the SCIG.

The SCIG is located only four miles from the Ports, offering an ideal situation for utilizing the most innovative technology on such a short route. The supplemental NOP mentions evaluating Maglev and other non-diesel delivery systems for transporting containers to and from the Ports. All other magnetic levitation systems for freight movement must also be considered and we recommend that the Port staff meet as soon as possible with the developers of this technology. In addition, we recommend that the following sites be explored thoroughly since much work around the world is occurring on innovative non-diesel truck methods of moving freight:

List of Web sites on automated freight and goods movement technologies:
http://faculty.washington.edu/~jbs/itrans/afreight.htm

List of Web sites on Maglev technologies:
http://faculty.washington.edu/jbs/itrans/maglevq.htm

In addition, contact should be made with the organizers of the "Fourth International Symposium on Underground Freight Transportation by Capsule Pipelines and other Tube/Tunnel Systems" held in Shanghai, China, October, 2005, to see what technologies their conference discussed as promising.
http://www.csueus.com/isuft2005/zhengwen-e.htm

Each of these companies and their technologies should be pursued as a possibility for moving containers to the SCIG as an alternative to heavy duty diesel trucks. The EIR should reference this list and explain why each of the technologies was or was not possible for use in the SCIG before selecting a diesel truck alternative.

SPECIFIC COMMENTS ON SECTIONS OF THE NOP AND SUPPLEMENTAL NOP

Project description: maps and figures

- The EIR must include a map to identify and show the proximity to all schools in the area, including parochial schools, as well as other facilities such as homeless shelters, housing for homeless veterans, daycare centers, community gardens, parks and recreational areas, many of which are within .25 miles of the proposed facility. The map included with the NOP is insufficient to show the impacted communities in all directions from the proposed project.

- The EIR must specify if the Alameda Corridor Long Beach South Lead Track, the South Lead Track, and the ACTA Bridge and Track Improvements are located in the vicinity of homes or schools.

- The "train switching area" is adjacent to homes and immediately north of Hudson School and other sensitive receptors. The EIR must describe what will happen at the switching area, how many switching locomotives will be operating, and what will happen on this track.

  In addition, the switching area is identified as an "Area of Less Frequent Train Movements." "Less frequent" is meaningless without specifying the actual anticipated number of train movement. This track is immediately adjacent to homes north of Willow. South of Willow the track is near school playing fields and very close to the Cambodian Temple. Any additional locomotives traveling along this corridor – even closer to the schools and homes than the SCIG would be – should not be allowed unless all trains are completely "green" or electrified. The EIR must calculate a baseline of exposure to pollutants from this track and switching area and an anticipated future range of pollutants. Please see Appendix F for a photo taken before the sound wall was built near the UP ICTF, showing how close the locomotives are to homes in the area.

- The NOP's truck route map indicates that no trucks will be traveling on the Terminal Island Freeway to reach the BNSF rail yard, although there will be a gate at the northern end of the facility. The attached map of the SCIG (Appendix C) (not a map included with the NOP) shows a truck queuing area near Sepulveda, raising questions about whether trucks will actually enter on that side. The EIR must be explicit that only the southern gate will be used and that the northern gate will not be used except in emergencies, since this would add a tremendous amount of additional traffic to the already truck-congested Terminal Island Freeway which is separated by nearby schools, parks, daycare centers, churches, and homeless shelters only by a chain link fence. If there are plans to expand the UP ICTF also or to merge the two facilities into one, then the entire issue of truck routing must be revisited. No additional diesel trucks should be added to the TI Freeway by either ICTF since the community is already demonstrated to have higher air pollution levels than other communities studied.

Comments on Environmental Checklist and Impact Analysis

- Project location. This section mentions additional rail tracks from Sepulveda Bridge north to Wardlow Road. It is unclear if this means that an additional track will be built. These tracks are immediately adjacent to hundreds of homes and several schools. The claim that the tracks "would be subject to less frequent train movements that the proposed Project Area" must be explained, since no volume of train movements in the Project Area is detailed. The homes north of Sepulveda near the train line are only a matter of feet from the trains and if there are to be more locomotives traveling on that line they must be non-diesel or electric.

- Surrounding land uses. This section needs to be expanded to specify precisely all the sensitive receptor facilities in the vicinity of the area, including schools, parks, churches, shelters, and residences.

Evaluation of Environmental Impacts
Section III. Air Quality

- **Would the project conflict with or obstruct implementation of the applicable air quality plans?**

  The bolded sentence added to this section of the supplemental NOP must be amended. It states that "non-diesel container delivery system alternatives will be evaluated in an effort to reduce identified regional emissions impacts" (emphasis added). The EIR must evaluate alternatives to reduce BOTH regional emissions and those localized emissions in close proximity to homes; schools, playfields, parks, community gardens, homeless shelters and other sensitive receptor facilities.

Section VII. Hazards and Hazardous Materials.

- **a/b. Would the project create a significant hazard to the public or the environment through the routine transport... of hazardous materials?**

- This section of the NOP states: "Trains using the intermodal facility may potentially transport hazardous materials." A map of the SCIG shown in a presentation at the Mobility 21 Conference (Appendix C) actually shows the Haz Mat area of the SCIG located directly across the Terminal Island from the homeless facilities and daycare center on San Gabriel Avenue. (Compare location of Haz Mat area on map in Appendix C with location of homeless shelter, transitional school for homeless children, and a daycare center less than .25 miles from the proposed SCIG, Appendix D). We recommend that this Checklist response be changed to "potentially significant impact," and that the EIR present a thorough evaluation of the risk of exposure, including identification of what types of hazardous materials will be handled at the facility. It would seem prudent to locate a Haz Mat area of the SCIG much further away from young children. In addition, the Emergency Response Plan should involve input from the adjacent community.

- **Would the project emit hazardous emissions or handle hazardous materials... within .25 miles of an existing or proposed school?**

  The list of schools needs to be updated; for example, Cabrillo High School is not mentioned, yet its playing fields are adjacent to the Terminal Island (103) Freeway and Hudson is a K-8 school, not a middle school. In light of the extremely close proximity of these schools and the [number of] children who attend them, the EIR should address what kinds of hazardous materials will be handled and exactly what response actions would be necessary—including communications systems and warning plans—in the case of an accidental release to ensure the safety of the children and staff at these schools, as well as local residents.

Section XI. Noise

The NOP appropriately states that the proposed intermodal facility and operation of the San Pedro tracks north of Sepulveda, along with a widened rail bridge, could increase traffic noise in the area, and that there could be noise from onsite heavy equipment. In addition, the NOP states that "the impact is potentially significant." The NOP states that the widened rail bridge would increase traffic and noise and argues that "it is not adjacent to residences." The rail bridge is actually close to the Cambodian Temple and less than ¼ mile from Hudson School. In addition, from Cabrillo High School near the school's playing fields, students playing can hear the rumbling sound of locomotives approaching on the San Pedro track (See photo in Appendix G). The EIR must specifically state what mitigation measures will be implemented to reduce noise and vibration from any trains operating in or entering and leaving the SCIG Project, as well as providing the baseline and project noise increases as suggested earlier. In addition, noise levels at baselines and projected forward for the Wilmington side of this project must be also be evaluated.

Noise was considered in the EIR of the Union Pacific ICTF, adjacent to the proposed SCIG. A sound wall was constructed, but even with the wall residents continue to complain about objectionable noise levels in the area from yard hostlers, locomotives, trucks on the road and at the UP ICTF, back up signals, screeching of trains on tracks when not lubricated and other issues. Feasible technology (in addition to any necessary sound walls) to reduce noise generated by sources connected to the proposed SCIG project must be thoroughly investigated in the EIR process.

Section XIII. Public Services and Section XIV. Recreation

- The NOP states that "the proposed project does not involve... direct impacts to any existing parks or recreational facilities. No impacts would occur. This issue will not be addressed in the EIR." This is not accurate. The proposed project would impact the public park directly across from the proposed SCIG. The park is south of Hudson School's playing fields and north of Cabrillo High School's playing fields. In addition, next to the park is a community garden. The park and garden are separated from the Terminal Island Freeway by a chain link fence. On the other side of the freeway is the

San Pedro train track, which is apparently to be expanded, and the proposed SCIG project. The park and garden would be impacted by noise, dust, tire/clutch/engine debris, air pollution, the potential for hazardous materials releases at the rail yard, and more.

For these reasons, the impacts should be considered "potentially significant" for both of these sections of the NOP

- In addition, at a time when physical activity is extremely important to all residents, especially youngsters in whom obesity is an increasingly significant health problem, it is imperative that no degradation of air quality occur in the park, playfields and recreational facilities in the area (including the Boys and Girls Club, Cabrillo fields, Hudson playing areas, the daycare center play area off San Gabriel Avenue and all other recreational facilities and parks in the area), as these facilities represent critical opportunities for the physical activities that are necessary for maintaining the health of children and young adults. Please see photo of the daycare center (Appendix H) to see the proximity of big-rig trucks currently through the chain-link fence that is the toddlers' only protection.

  The proximity to existing high levels of pollutants on the nearby TI Freeway and the UP ICTF raises serious questions about children exercising in that type of environment. BNSF must consider, in conjunction with the UP ICTF (if any expansion is to occur there), whether appropriate mitigation measures would include air filtration for the community's schools and/or building air-conditioned gyms, for which parents of school children and teachers have been calling.

In sum, we are deeply concerned that the NOP inadequately addresses the health effects that the SCIG will have on the people who live, learn, play, and work in the vicinity of the project area. The EIR should fully address all aspects of the SCIG's impacts, including the numerous impacts created by the delivery of containers to the site as well as impacts that arise from the increase in goods movement through the ports, on the rail lines, and on the freeways that this project will enable. We expect the EIR to address a broad range of alternatives, including alternative siting and maximization of on-dock facilities, and fully confront the health risks posed by the project and the alternatives. Finally, the EIR must identify and implement and implement mitigation measures to reduce the impacts of all aspects of the SCIG to health-protective, no-increase levels.

Sincerely yours,

Andrea M Hricko

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Director. Community Outreach and Education
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Appendices

Table of contents

Appendix A. List of Scientific References on Air Pollution's Effects on Health for Consideration in the EIR Process. All articles and abstracts can be found in Appendix B, on the Compact Disk (CD).

Appendix B. CD with Scientific Articles for Consideration in the EIR Process.

Appendix C. Map of SCIG presented in a Port of Los Angeles Mobility 21 Power Point presentation.

Appendix D. Map showing location of homeless shelter and daycare center.

Appendix E. Presentation on Elemental Carbon Levels at Hudson School.

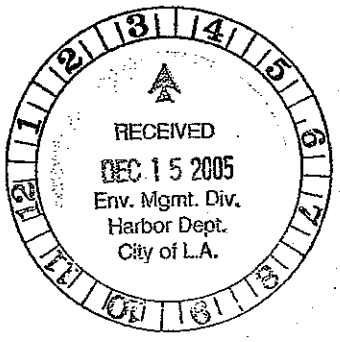
Appendix F. Photo of Locomotive in West Long Beach.

Appendix G. Photo of Children Playing at Cabrillo High School Fields with Locomotive in Background.

Appendix H. Photo of play area at Daycare Center on San Gabriel Avenue.

Appendix I. Demographic data for the three zip codes affected.

Attached: South Coast Air Quality Management District Monitoring and Analysis: Rule 1158 Follow-up Studies #7, #9, and #11.



Appendix A.

List of Scientific References on Air Pollution's Effects on Health for Consideration in the EIR Process. All articles and abstracts can be found in Appendix B, on the Compact Disk (CD).

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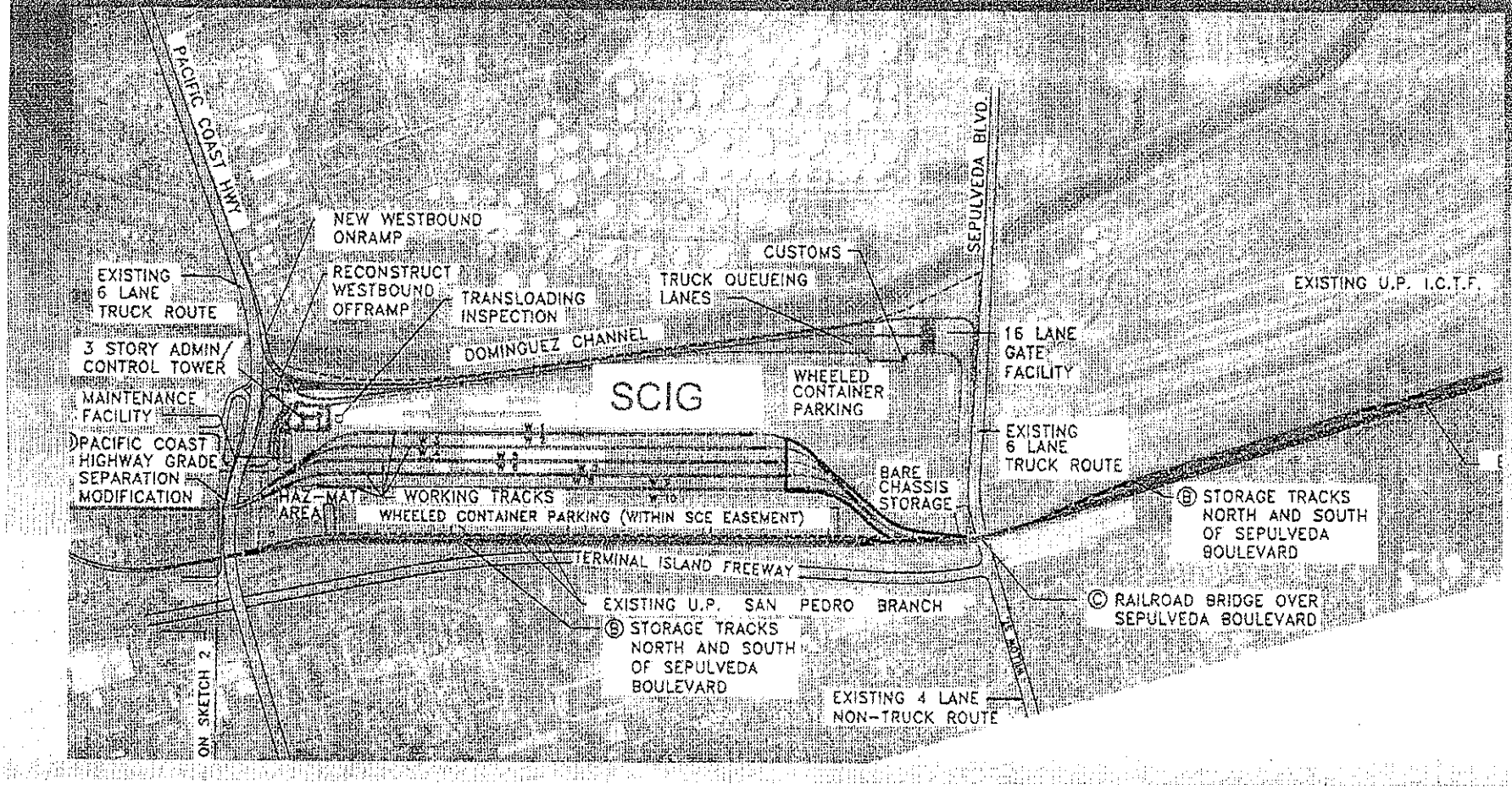
Appendix B. CD with Scientific Articles for Consideration in the EIR Process.
Please see attached CD.

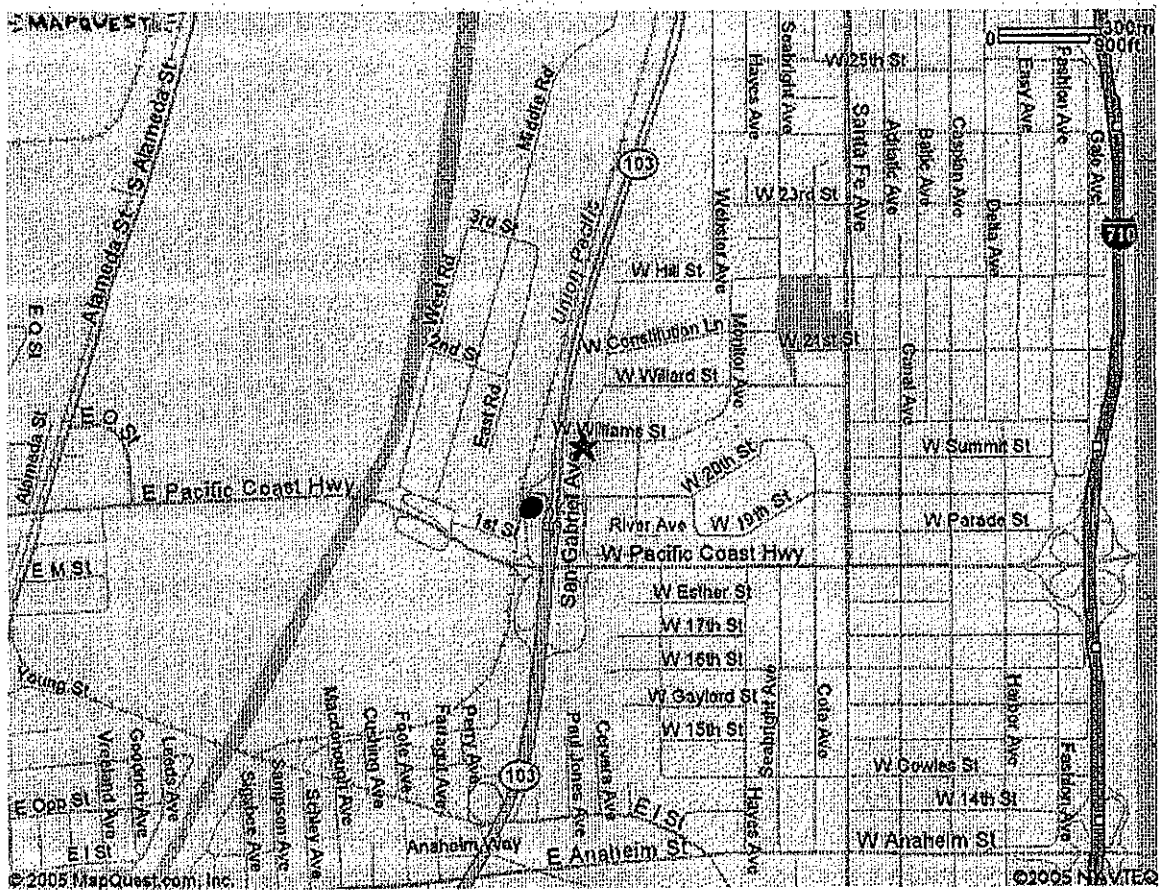
[Please contact Port of Los Angeles Environmental Management Division for information contained on this CD]

Southern California International Gateway (SCIG)



Appendix C – Map of SCIG – Presented in a Port of Los Angeles Mobility 21 PowerPoint Presentation

THE PORT OF LOS ANGELES



Appendix D

Map showing location of daycare center and other facilities for children and homeless adults across from proposed SCIG

On San Gabriel Avenue in the vicinity of the "Star" are a homeless shelter, school for homeless children, and a transitional school for homeless children. These are all adjacent to the Terminal Island (103) Freeway, very close to the suggested "off ramp" for trucks entering the facility, and in close proximity to the Haz Mat area ● shown on the map in Appendix C.

Appendix E: Presentation on Elemental Carbon Levels at Hudson School

Submitted as part of comments on the SCIG Project NOP and

Supplemental NOP

Comments submitted to LAHD
by Andrea Hricko, USC
December 14, 2005

The following slides in "Appendix E" related to AQMD sampling studies of elemental carbon levels at Hudson School and other schools in Long Beach and Wilmington from 1998 – 2004

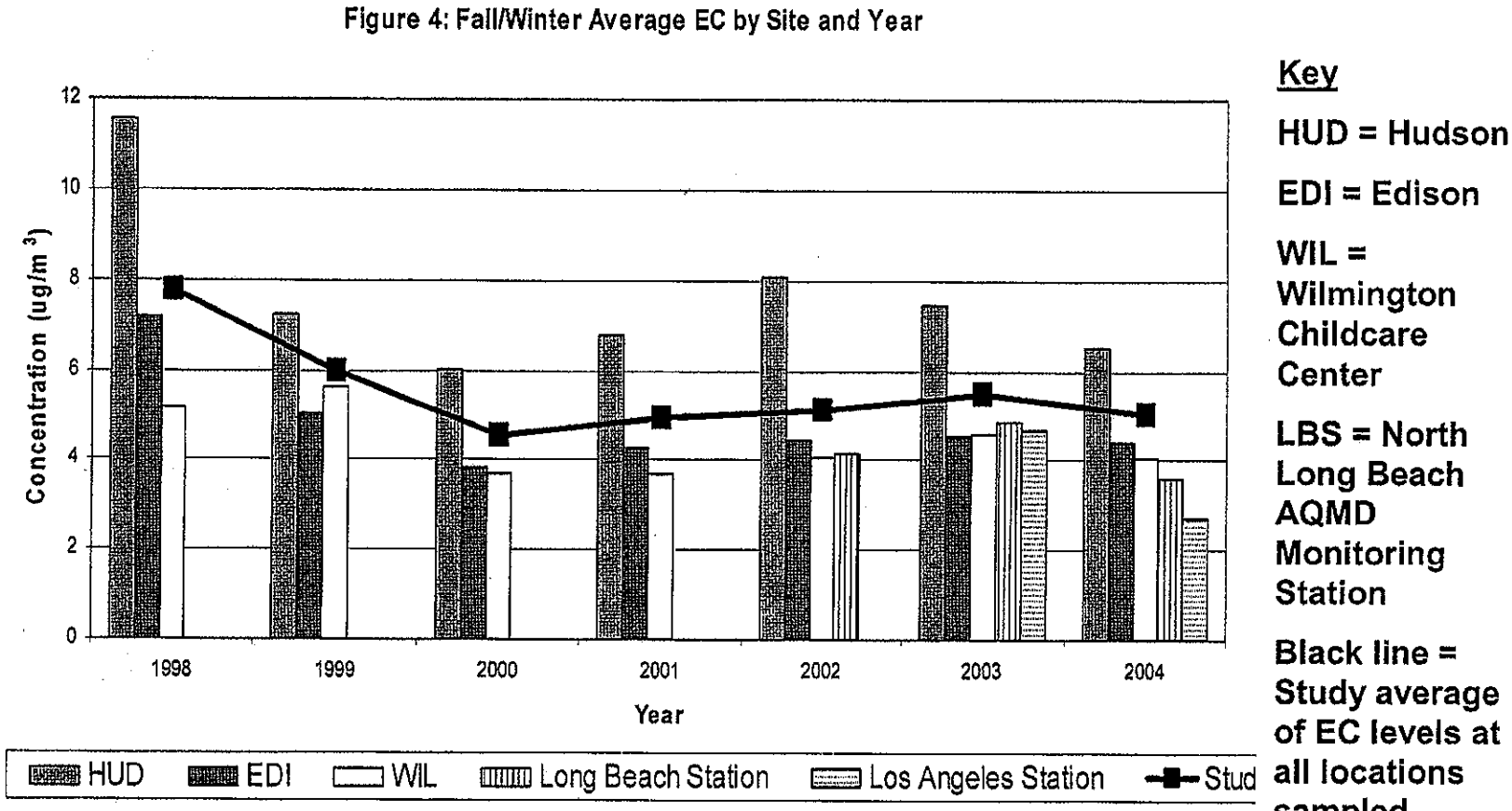
South Coast AQMD Measurements of Elemental Carbon at Schools Near the Port

- Hudson School
  - Adjacent to Terminal Island Freeway
  - Within ¼ to ½ mile of the Union Pacific ICTF
  - Within ½ to one mile of several refineries
  - AQMD sampling at Hudson started in 1998 because of complaints about coke dust \
    - Focus of reports since that time: whether the coke piles are under control so that coke dust no longer escapes into the air and community
  - Sampling continues to occur because of AB 1775 (Lowenthal)
    - Sampling occurs every six days for several months
  - In June 1999, AQMD Rule 1158 went into effect requiring reduction of coke dust particulate matter sources

Sampling Data

- The sampling data shown in the following slides are from reports published by the South Coast AQMD
- See Rule 1158 Follow-Up Studies #7, 9 & 11, Attached

Figure 1. Comparison of Elemental Carbon Levels



Key

HUD = Hudson

EDI = Edison

WIL = Wilmington Childcare Center

LBS = North Long Beach AQMD Monitoring Station

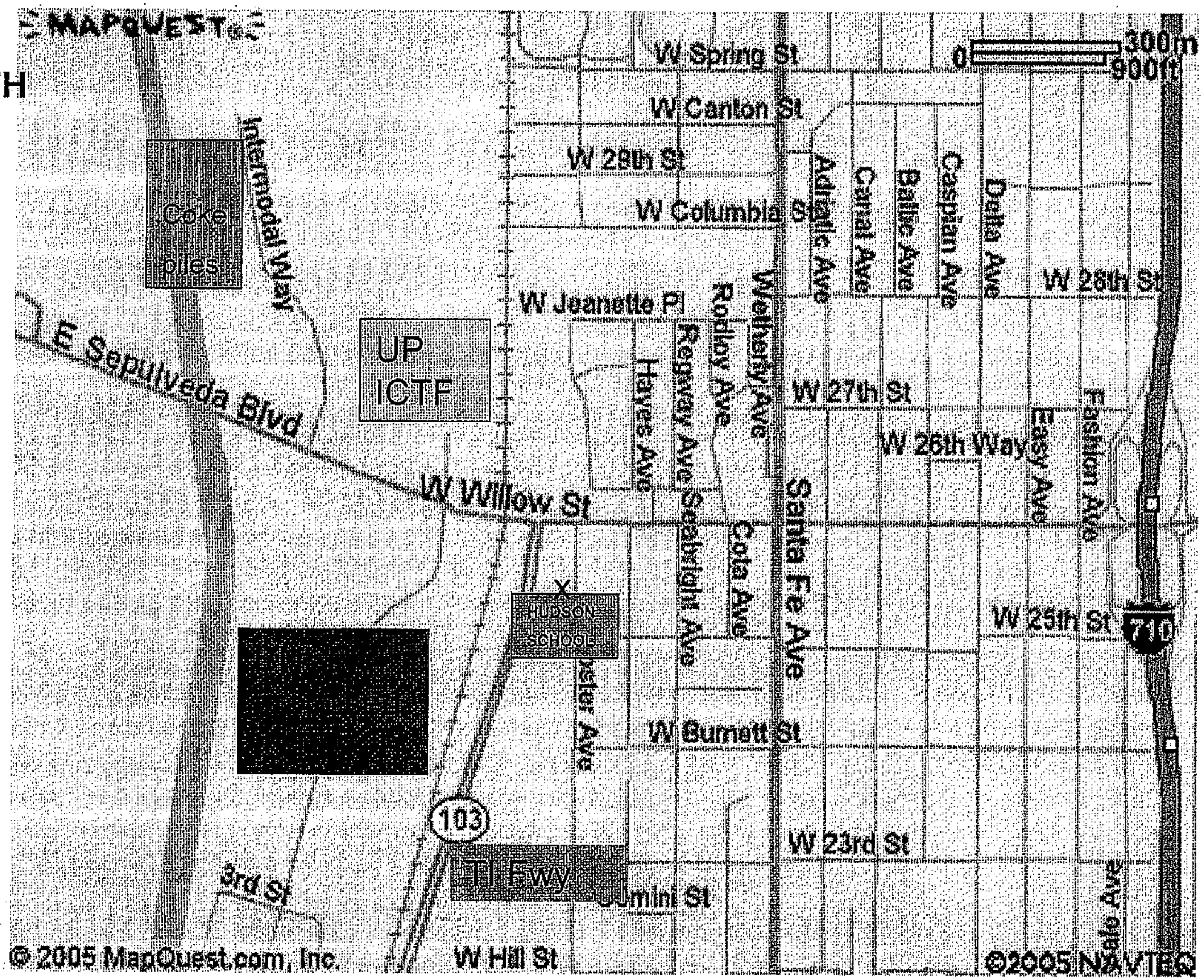
Black line = Study average of EC levels at all locations sampled

Source: AQMD 1158 Reports

Figure I Comments

- Measurements are shown for fall-winter
- Levels of EC at Hudson (HUD) are routinely the most elevated among the measured sites in Wilmington and Long Beach
  - Hudson School (HUD) levels approximately 200% higher than levels at North Long Beach AQMD site in 2002
  - Hudson School (HUD) levels 150% higher than levels at North Long Beach AQMD site in 2003

NORTH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W Jeanette Pl
Coke piles
Intermodal Way
UP ICTF
E Sepulveda Blvd
Hayes Ave
Regway Ave
Rodloy Ave
Wetherly Ave
W 27th St
W 26th Way
Easy Ave
Fashion Ave
W Willow St
Seabright Ave
Cota Ave
Santa Fe Ave
HUDSON SCHOOL
W 25th St
710
W Burnett St
103
W 23rd St
TI Fwy
3rd St
W Hill St
© 2005 MapQuest.com, Inc.
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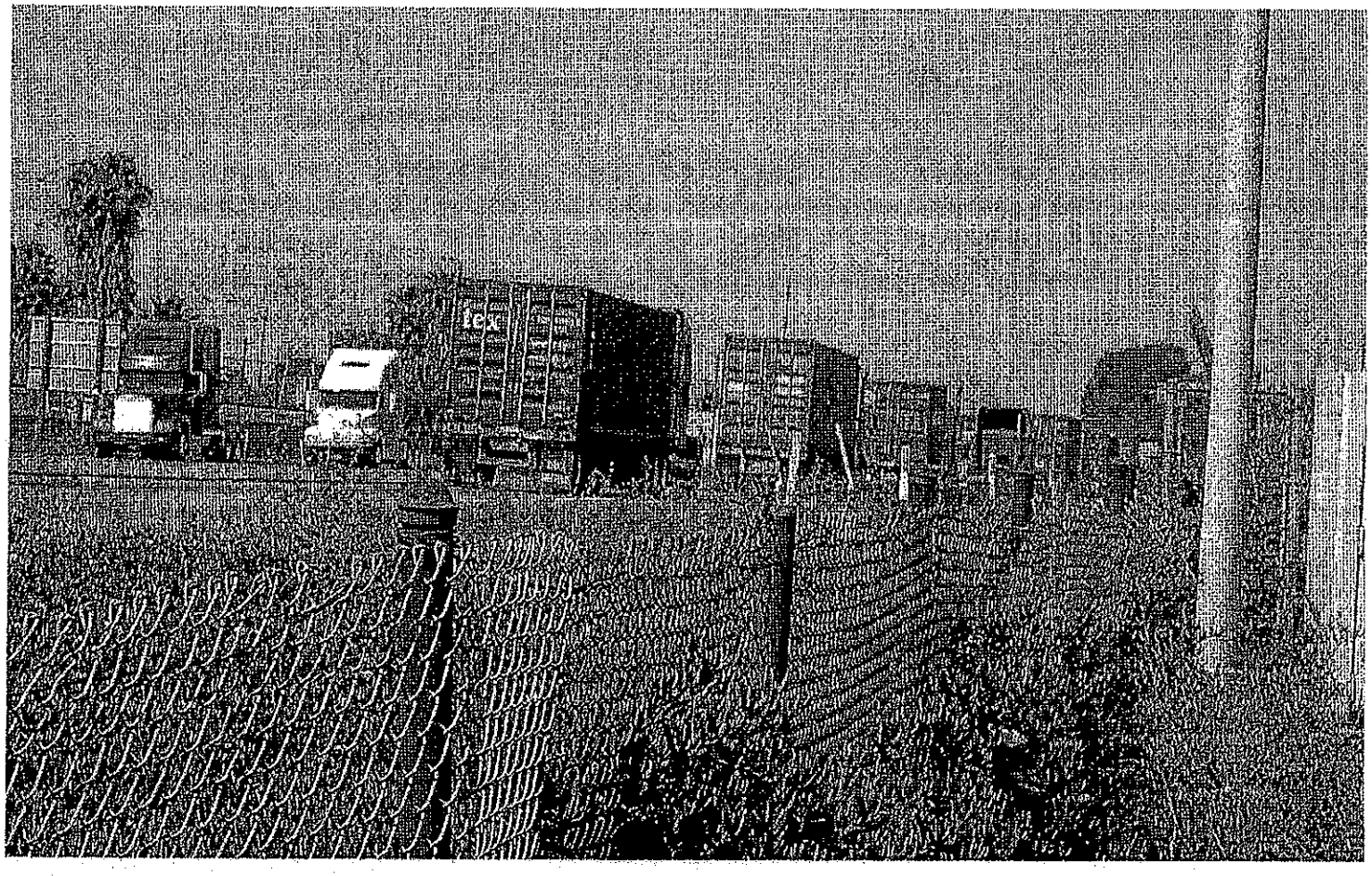
Elemental Carbon (EC) Sources

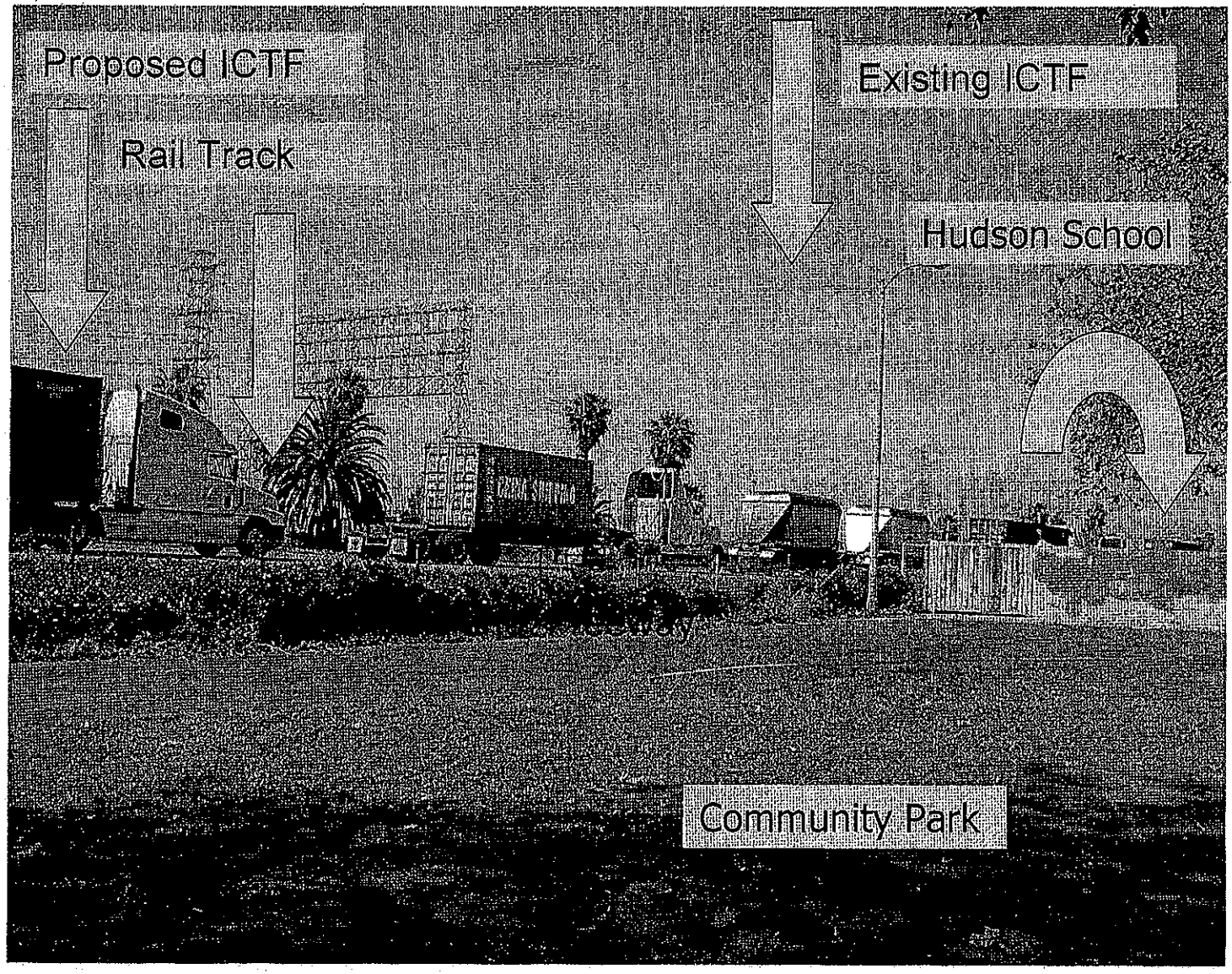
- The AQMD reports state that all control measures for coke dust were implemented by the year 2000.
- One report states that the EC levels are highest at Hudson when the winds blow from the West or Northwest

Photo of Terminal Island (TI) Freeway taken immediately south of Hudson School play fields. TI Freeway is to the West of Hudson and adjacent to the school property. A chain link fence separates the freeway and the school grounds.



What is in Close Proximity to Hudson School?

- *Immediately West:* Terminal Island (TI) Freeway with high volume of trucks
- *Immediately West of the TI Freeway* is a rail line with occasional locomotive traffic and occasional idling.
- *Northwest of Hudson School (an estimated 1/3 of a mile)* is the Arco refinery
- *Northwest of Hudson School* (approximately 1/3 mile away) is the Union Pacific Intermodal Container Transfer Facility
- *Immediately NW of Hudson School* is the intersection of the TI Freeway and Willow/Sepulveda
  - Trucks regularly back up here as they try to turn left to get to the ICTF


Proposed ICTF
Rail Track
Existing ICTF
Hudson School
Community Park

Nearby Mobile Sources of EC

- Terminal Island Freeway (TI)
  - The TI Freeway (connects the Ports and the UP ICTF)
  - Union Pacific Rail Road (UPRR) Intermodal Container Transfer Facility (ICTF)
    - Appro x. 1/3 mile from Hudson and adjacent to the Alameda Corridor
  - Trucks travel up Alameda Street or TI Freeway to get to the ICTF

A Natural Experiment

- The 2002 Port lockout
  - 100+ ships in harbor and not being unloaded
- If the major source of EC at Hudson School were still from the coke piles, the levels of EC would have remained high
  - Nothing unusual reported to be happening at refineries or coke operations during the Port lockout

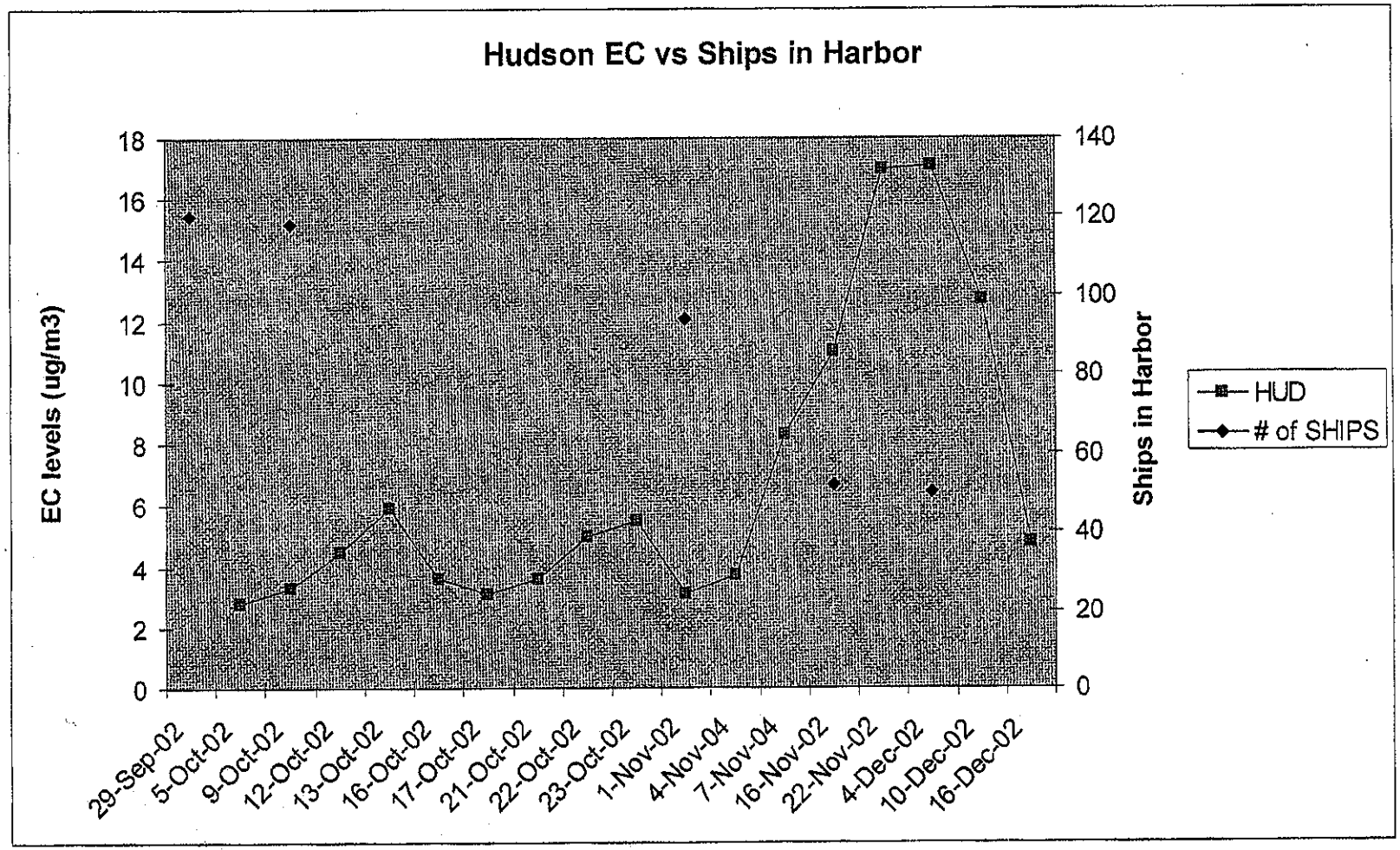
Hudson School
Elemental Carbon Measurements

- The AQMD conducted special sampling during the Port lockout in fall of 2002
  - During the lockout, September 29-October 9, 2002, there was little container truck traffic from the Ports to the ICTF and little activity at the ICTF (railyard) itself because no containers were being unloaded from the ships waiting in the harbor
  - Sampling occurred on two days of the lockout
  - These samples show EC levels at Hudson approximately 250% lower than the typical annual fall-winter average during the Port lockout

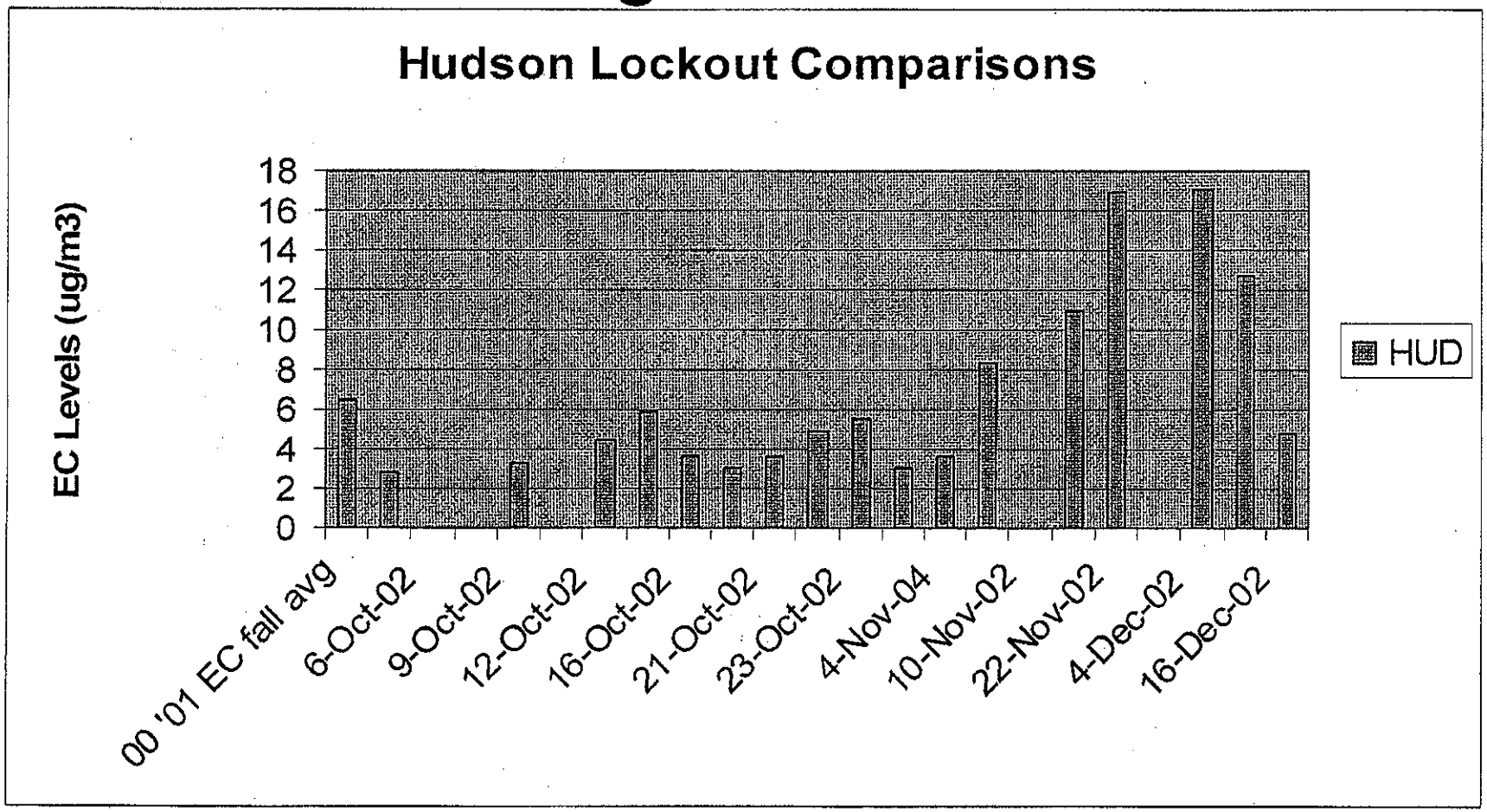
Post-Lockout, Unusual Truck Activity to Move Containers

- When the lockout ended, it took some time to get the containers off the ships
- The AQMD says that by mid-November the intermodal traffic was back in full force.
- Starting in mid-November the levels of elemental carbon increased dramatically, especially at Hudson School

Hudson School EC Levels During and After Lockout

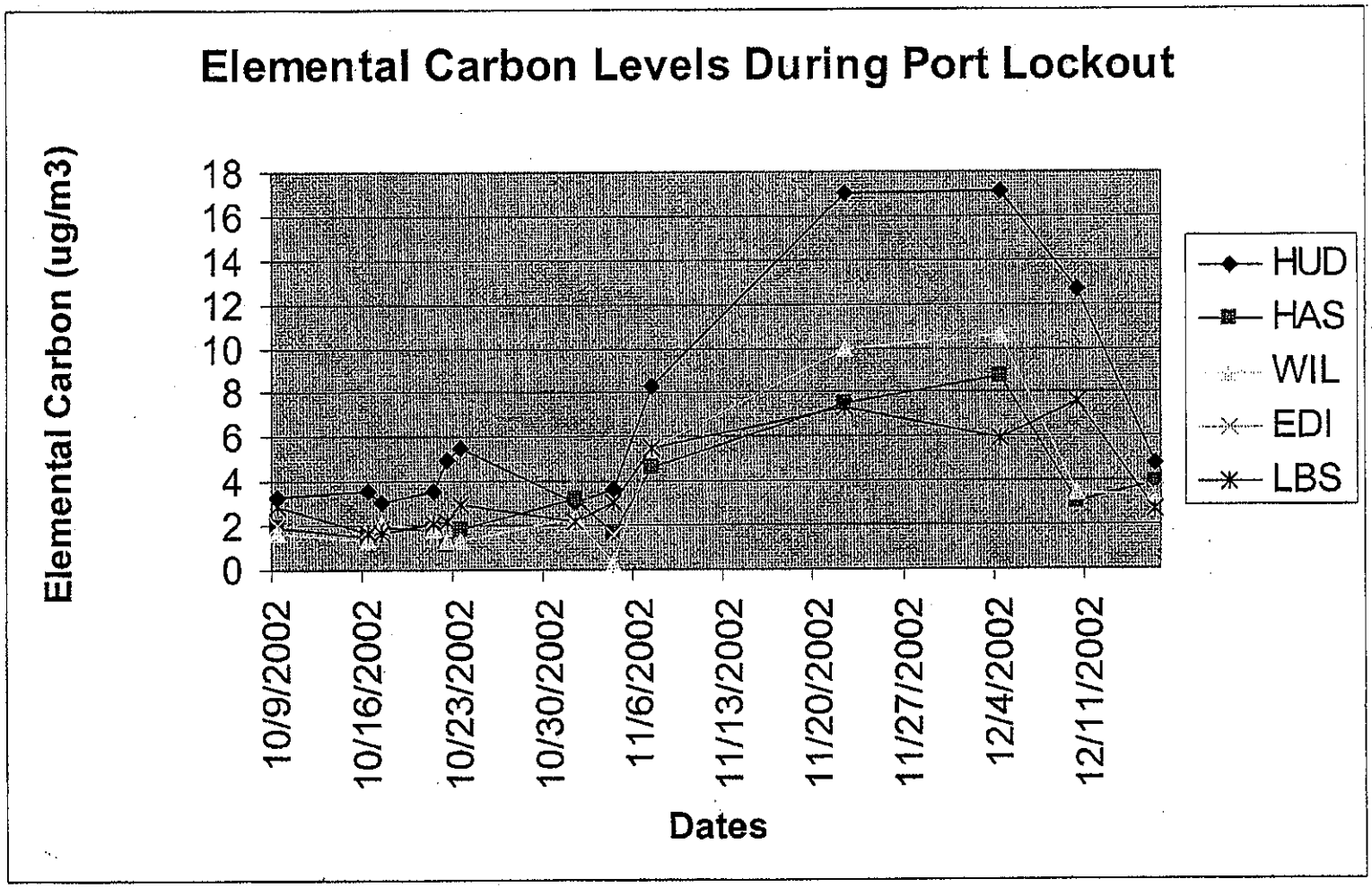


Before, During and After Lockout

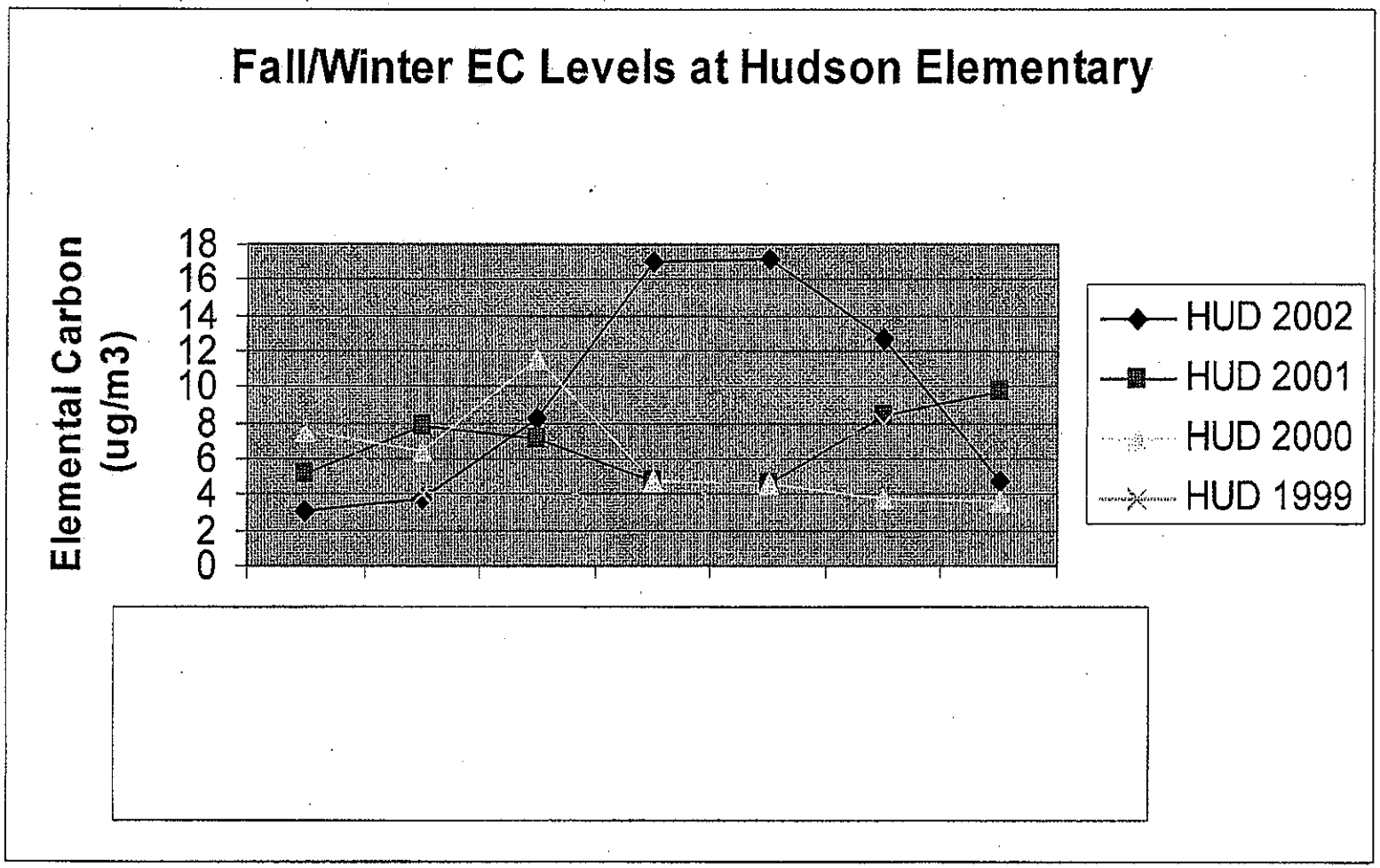


October 6 – November 4th EC levels were significantly lower than the '00-'01 average shown at the beginning of the chart. Late November and Early December levels were much higher than normal levels.

Hudson vs. All Other Sampling Sites



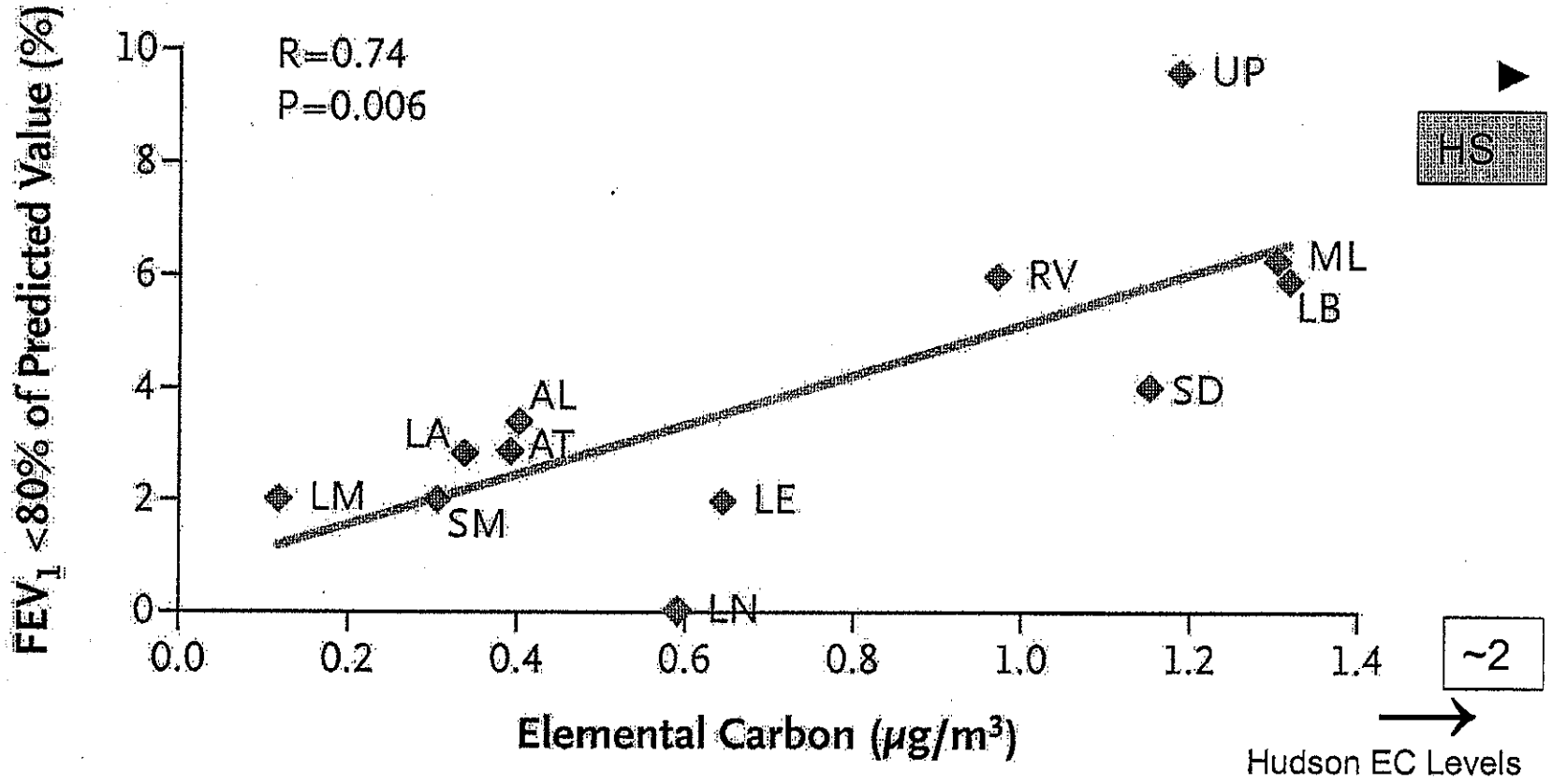
Comparison of EC Levels at Hudson School from 1999-2002



Elemental Carbon Concerns

- In the USC Children's Health Study, 5x as many children in the most polluted communities suffered reduced lung function than children in the less polluted communities.
- These results were related to a package of traffic-related pollutants, including elemental carbon.

Abnormal Lung Function – Diesel Exhaust Exposure (elemental carbon)



LB = North Long Beach. LB has 1.35 ug/m3 average EC levels, with 5 ½ % of students having FEV_1 below 50% of predicted value (a measure of lung function)

HS = Estimated Hudson School Abnormal Lung Function Percentages

Gauderman et al [USC], *NEJM, 2004*

Comments on Previous Abnormal Lung Function Graph

- Hudson School Elemental Carbon Levels: approximately 1 ½ x higher than EC level at North Long Beach Station, so approximately 2 ug/m3. Source of Graph: (Gauderman, 2004) on CD.
- The above chart indicates that approximately 6% of children in Mira Loma and Long Beach, who are exposed to average levels of Elemental Carbon of about 1.35 ug/m3, have FEV1 (or lung function) reduced below 80% of the expected value for their age. Only 2% of children in the less polluted communities – e.g., Lompoc (LM) – have that level of reduced lung function.
- The levels of Elemental Carbon at Hudson School average approximately 1 ½ times higher than those at North Long Beach station, indicating that an even greater number of children at Hudson School may be suffering respiratory effects.

Conclusions re elemental carbon levels at Hudson School

- There is intense big-rig truck activity on the TI Freeway, immediately west and adjacent to Hudson School, with the trucks heading from the Ports to the UP ICTF on Sepulveda.
- Locomotives operating on tracks immediately to the West of the TI Freeway add to the mobile source pollution in the area.
- Truck and locomotives and yard equipment (all diesel-powered) are also operating within the ICTF and diesel locomotives are operating on the nearby Alameda Corridor
- Although in the late 1990's, there were significant amounts of coke dust in the area, officials at AQMD say that the coke dust situation has been mitigated. Therefore, we believe that the levels of EC at Hudson School are currently being driven by the mobile source emissions related to goods movement in close proximity to Hudson School (with possible additional contribution from residual coke dust or refinery emissions). As evidence, we point to the Port lockout data from AQMD:
- The levels of EC at Hudson were extremely low during the Port lockout (when there were few trucks on the TI Freeway but when refineries were operating) and extremely high when the cargo backlog was resolved (when truck and intermodal activity was at an all-time peak to get the containers to their Christmas-time destinations in 2002 after the work stoppage).