

Coalition For A Safe Environment

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Sam A. Joumblat
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Re: ICTF Joint Powers Authority
CEQA Notice of Preparation & Initial Study
Intermodal Container Transfer Facility
Modernization Project

Su: Submission of Public Comments

Mr. Joumblat:

The Coalition For A Safe Environment is an Environmental Justice Community based non-profit organization with members in Wilmington, Long Beach, Carson and over 20 other cities in California.

Coalition For A Safe Environment (CFASE) Mission Statement is - To protect, promote, preserve and restore our Mother Earth's delicate ecology, environment, natural resources and wildlife. To attain Environmental Justice in international trade marine ports, goods movement transportation corridors, petroleum and energy industry communities.

On behalf of our members we submit the following public comments:

1. Proposed Project Goals

A. Reduce emissions at the ICTF by replacing diesel-powered equipment with electric-powered equipment.

Request the JPA, Ports and Union Pacific:

- a. Not limit reduction of emissions to only replacing diesel-powered equipment with electric-powered equipment.
- b. Replace all Harbor Line, Union Pacific and BNSF railroad diesel fuel and alternative petroleum fuel switching and line-long haul locomotive engine trains from the Ports to the ICTF with an all Electric Train or MagLev Train Technology System which eliminates all diesel fuel emissions.

- c. Up-grade the Alameda Corridor to be an Electric Train or MagLev Train Technology which eliminates all diesel fuel emissions.

B. Provide additional near-dock rail capacity and container throughput by increasing operation efficiencies consistent with the Ports' Rail Master Plan Study and minimize surface transportation congestion and/or delays.

Request the JPA, Ports and Union Pacific:

- a. Conduct an assessment of a 21st century MagLev Train Technology System that can be used by Ports to the ICTF facility and the Alameda Corridor which would eliminate the need for expanding the ICTF facility since a MagLev Train Technology System would be more cost effective, efficient, increases velocity and capacity by 3X to 5X.

We recommend the American Maglev Technology, Inc. - MagLev EMMI Cargo System. American Maglev Technology, Inc. has offered to build the demonstration project at no cost to the JPA, Ports and Union Pacific.

The EMMI Cargo System uses a proven magnetic levitation technology to transport containers and bulk cargo. Maglev technology passenger transportation systems are currently in use throughout the world. The EMMI MagLev System produces no air pollution, minimum noise, minimizes ground vibration, operates on a track and only requires a maximum of a twenty foot wide easement. The system can transport 4,000+ container loads per day. The MagLev train travels from "0" mph to 60mph at a cost of about \$10 per hour per 80kw.

- b. Conduct an assessment of an Electric Train or MagLev Train Technology System for use by Ports to the Alameda Corridor that can be used which would eliminate the need for expanding the ICTF facility since an Electric Train Technology System would be more cost effective, efficient, increases velocity and capacity by 2X to 3X.
- c. Prepare a new Rail Master Plan that would allow new terminals and the expansion of existing terminals to be integrated into a new modern 21st century Maglev Train Technology System or Electric Train Technology System vs the current 20th century Diesel fuel Locomotive Engine Transportation Technology.
- d. The existing Rail Master Plan Study is out dated 20th century technology and does not meet 21st and 22nd century environmentally green, public health safety and efficiency needs.

C. Provide enhanced cargo security through new technologies, including biometrics.

Request the JPA, Ports and Union Pacific:

- a. Require all enhanced cargo security equipment and biometrics be contained and performed on port property thereby eliminating increased equipment costs, personnel costs, inspection time and waste of public funds on off-port property duplicative cargo security equipment and inspection costs.

- b. Require all containers be inspected on port property prior to being transported off-port property thereby eliminating potential public impacts.
- c. Require all non-container cargo be inspected on port property prior to being transported off-port property thereby eliminating potential public impacts.
- d. Require all drayage trucks be inspected on port property prior to being transported off-port property thereby eliminating potential public impacts.

D. Continue to promote the direct transfer of cargo from port to rail with minimal surface transportation congestion and/or delays.

Request the JPA, Ports and Union Pacific:

- a. Ports build on-dock shipside rail lines to allow direct drop down from cranes unloading containers to awaiting rail cars to eliminate duplicative and increased trans-loading costs and the need for off-port property intermodal facilities such as the ICTF. On-dock shipside rail increases efficiency, velocity, capacity and decreased shipment time.
- b. Ports build on-dock shipside rail lines to allow direct drop down from cranes unloading cargo and bulk cargo to awaiting rail cars to eliminate duplicative and increased trans-loading costs and the need for off-port property intermodal facilities such as ICTF. On-dock shipside rail increases efficiency, velocity, capacity and decreased shipment time.
- c. Ports prepare a new Rail Master Plan that would allow new terminals and the expansion of existing terminals to be integrated into a new modern 21st century Maglev Train Technology System or Electric Train Technology System vs the current 20th century Diesel Fuel Locomotive Engine Transportation Technology System.
- d. Ports and tenants utilize real-time IT logistics software to identify containers and cargo for strategic placement on ships and for first-in, first-out efficient unloading for direct non-stop destination transportation.

E. Project goals will be further defined in the Draft EIR.

Request the JPA, Ports and Union Pacific:

- a. Require the ICTF NOP/IS identify all project goals for addressing the ICTF construction and operation so that the public is able to provide advance scrutiny, assessment, alternatives recommendations and public comment. This saves substantial project personnel time costs, government agency personnel time costs, public time and unnecessary waste of public funds held in trust.
- b. Require the ICTF NOP/IS identify all project goals for addressing the ICTF environmental impacts and mitigation during construction and operation so that the

public is able to provide advance scrutiny, assessment, alternatives recommendations and public comment. This saves substantial project personnel time costs, government agency personnel time costs, public time and unnecessary waste of public funds held in trust.

- c. Require the ICTF NOP/IS identify all project goals for addressing the ICTF public health impacts and environmental mitigation during construction and operation so that the public is able to provide advance scrutiny, assessment, alternatives recommendations and public comment. This saves substantial project personnel time costs, government agency personnel time costs, public time and unnecessary waste of public funds held in trust.

2. Increased Alameda Corridor Usage Alternative

Request the JPA, Ports and Union Pacific:

Require a mandatory increased usage of the Alameda Corridor by all Port tenants. The Alameda Corridor's current available capacity is 65%-70% for new container and cargo shipments. The increased usage of the Alameda Corridor would decrease the need to expand the ICTF facility.

3. Intermodal Rail Facility Location Alternatives

Request the JPA, Ports and Union Pacific:

- a. Require that the Port of Long Beach Toyota Logistics import car terminal be assessed as a potential near-dock intermodal rail facility. There is no reason that two or more multi-story car parking lot structures cannot be built that can free up to 80% of the parking lot area. The Toyota lease can be re-negotiated with new incentive offered and/or the lease re-negotiated when it expires. New import cars sales decreased last year 2008, will continue to decrease this year 2009 and are projected to decrease next year 2010. There is a higher priority need for a new intermodal facility.
- b. Require that the new Port of Long Beach Middle Harbor Redevelopment Project Terminal be assessed as a potential on-dock intermodal rail facility. Port of Long Beach container business decreased in 2008, will decrease in 2009 and projected to decrease in 2010. An on-dock intermodal facility is a higher priority need vs a near dock facility.

4. Drayage Trucks Alternatives.

Request the JPA, Ports and Union Pacific:

- a. Require that all diesel fuel and alternative petroleum fuel drayage trucks servicing the ICTF facility be replaced with short haul Balqon Corproation. or equivalent Electric Drayage Trucks.

The Balqon Electric Truck is designed to be a short haul distance drayage truck. It is zero air polluting, has a maximum speed of 40mph, has a maximum range of 60 miles when empty unloaded and a maximum range of 30 miles fully loaded. It can transport a standard 65,000 lb. loaded container. It can be 60% charged in 1 hr and 100% charged in 3-4 hrs.

- b. Require that all diesel fuel drayage trucks that are 2005 and older servicing the ICTF facility that have a crankcase blow-by pipe be retrofitted with the Miracle Mile Solution, Inc. Vehicle Additive Technology Solution System and HAD Crankcase Recirculation System Technology.

The Vehicle Additive Technology Solution System (VATSS) is an innovative hybrid sequential fuel management system, which lowers fuel consumption and increases combustion efficiency. Exhaust stack pollution is significantly reduced as a result of improved combustion efficiency and lower fuel consumption.

The major benefits of VATSS are: Increased Miles per Gallon (MPG), Lower Fuel Expenses, Tail-Pipe Emissions that meet or exceed the 2007 EPA Emissions Standards and Reduced Greenhouse Gas pollutants from engines after its installation. This will not negatively affect the Factory OEM Horse Power Ratings.

The HAD Crankcase Recirculation System has a C.A.R.B. EO # D-650. This system eliminates all crankcase emissions known as blow-by and returns combustion VOC vapors from the crankcase into the air intake induction system as a reusable fuel source. In addition this technology system recycles residual oil and returns it to the crankcase.

This system also eliminates all the by-product VOC vapor gases and toxic PM fumes from the crankcase traditionally expelled from the blow-by tube, thus removing all the crankcase air pollutants from the atmosphere and the traditional oil leakage unto the ground, which occurs during idle and normal engine operating conditions that are toxic and contains carcinogens. This system does not have filters to change and also decreases oil consumption.

5. Intermodal Rail Yard Emissions Control Alternatives

Request the JPA, Ports and Union Pacific:

- a. Require the ICTF facility to use the Advanced Cleanup Technologies, Inc. - Advanced Locomotive Emissions Control Systems (ALECS) to capture locomotive engine emissions. The system reduces Sulfur Dioxide (SOX) by 97%, Particulate Matter (PM) by 92% and Oxides of Nitrogen (NOX) by 97%.

Advanced Cleanup Technologies, Inc. - Advanced Locomotive Emissions Control System (ALECS). A train locomotive idling engines exhaust is captured by an emissions capture system which consists of a bonnet that is placed over a smoke

stack to suck in the exhaust which is then transferred through a hose-like duct to an emissions treatment subsystem. The ALECS System can be configured to have multiple bonnets to connect a series of locomotive engines and can be mounted on an overhead rail system which can traverse back and forth over one or more idling locomotive engines. ALECS would typically be built on one side of the rail tracks.

- b. Require all fuel storage tanks to be built or retrofitted with a 100% closed-loop vapor recovery system that does not vent out VOC's into the ambient atmosphere.

6. Electric Utility Power Alternatives

Request the JPA, Ports and Union Pacific:

- a. Require that a 30 MW Solar Power System be built at the ICTF facility. The proposed project will have significant impact upon public LADWP electrical power utility to provide electrical power. The JPA, Ports and Union Pacific do not significantly financially contribute to the building of new electrical power facilities, their maintenance, repair or replacement. There is sufficient overhead space above buildings, rail yard area, railroad tracks, facility grounds and containers that is available.

We recommend the Pyron Solar, Inc. - Solar Energy Power Plant

Pyron Solar has developed a concentrating solar technology that is a revolutionary low-profile floating system with short-focal-length lenses which concentrate direct sunlight by 400% onto photovoltaic cells. These advanced multi-junction cell and arrays generate 800 times more electricity than conventional non-concentrating cells the same size. The National Renewable Energy Laboratory of the U.S. Department of Energy has confirmed a 37.3% efficiency of the cells. The system does require cooling potable water from any source. Using the same land surface area a Pyron Solar Power Plant generates 14.5 times more electricity that the world's largest solar power plant, SOLAR II, 8.6 times more electricity than the LUZ-solar power plant in Kramer Junction, CA and 190 times more electricity that the solar chimney plant in Manzanares, Spain.

- b. Require that a 60 MW Wind Energy Power System be built at the ICTF facility and along the railroad tracks. The proposed project will have significant impact upon public LADWP electrical power utility to provide electrical power. The JPA, Ports and Union Pacific do not significantly financially contribute to the building of new electrical power facilities, their maintenance, repair or replacement. There is sufficient overhead space above buildings, rail yard area, railroad tracks, facility grounds and containers that is available.

We recommend the Mariah Power Windspire and Quiet Revolution, LTD. Vertical Wind Turbine designs.

7. Health Impact Assessment (HIA) & Public Health Survey Study Alternatives

Request the JPA, Ports and Union Pacific:

- a. Conduct a Health Impact Assessment Study as part of the Environmental Impact Report and Health Risk Assessment (HRA). An HIA provides a more comprehensive assessment of the public health and economic impacts of a project. The Los Angeles County Health Department and the US EPA Region 9 both support the use of a HIA for Ports and goods movement construction and operation projects.
- b. Conduct a Public Health Survey (PHS's) in the identified public impacted sensitive receptor areas, which can be used to establish a Public Health Baseline (PHB). Health Risk Assessments are significantly inaccurate because they are based on a computer model and not an actual Public Health Baseline.
- c. Require the establishment of a Public Health Care Mitigation Fund that can mitigate public health impacts, support necessary HIA, PHB, PHS's research studies and provide financial assistance for immediate, short term and long term care such as:

Public health care & treatment, assistance to pay for health care at local clinics & county hospitals, assistance to pay for health insurance, assistance to pay for medical equipment, assistance to pay for medical supplies, assistance to pay for medical prescriptions, assistance for funeral expenses, assistance for short & long term convalescent care, assistance for rehabilitation, assistance for job retraining, assistance for lost income and assistance for special learning disability assistance.

8. Noise Mitigation Alternatives

Request the JPA, Ports and Union Pacific:

- a. Require the installation of Sound Proof Glass in all residential homes, public schools, senior care facilities etc. and sensitive receptors within 3 miles of the ICTF facility. Request that the Sound Proof Glass have a minimum STC Rating (Sound Transmission Class) of 56.
- b. Require the installation of Sound Proof Doors in all residential homes, public schools, senior care facilities etc. and sensitive receptors within 3 miles of the ICTF facility. Request that the Sound Proof Glass have a minimum STC Rating (Sound Transmission Class) of 60.
- c. Require the installation of Sound Proof Curtains in all residential home, public schools, senior care facilities etc. and sensitive receptors within 3 miles of the ICTF facility. Sound Proof Curtains can also be temporarily installed during any construction. Request that the Sound Proof Curtains have a minimum STC Rating (Sound Transmission Class) of 50.
- d. Require that no track be within 1500' of residential homes, public schools, senior care facilities etc. and sensitive receptors.

- e. Require that ICTF establish a plan to minimize usage of rail tracks near residential homes, public schools, senior care facilities etc. and sensitive receptors when not necessary.

9. Light Mitigation Alternatives

Request the JPA, Ports and Union Pacific:

- a. Require the installation of electrical energy saving LED lighting fixtures in lieu of its planned lighting fixtures.
- b. Require that the maximum height of a lighting fixture be 40' in height.
- c. Require that ICTF establish a plan to minimize light usage when parts of the facility are not being used.
- d. Require the installation of electrical energy saving LED lighting fixtures in lieu of its planned lighting fixtures.

10. Air Quality Mitigation Alternatives

Request the JPA, Ports and Union Pacific:

- a. Require that the ICTF stop locomotive engine and drayage truck operations on SCAQMD smog alert days.
- b. Require that the ICTF stop locomotive engine and drayage truck operations when a federal National Ambient Air Quality Standard (NAAQS) is exceeded.

11. Cumulative Impact Assessment

Request the JPA, Ports and Union Pacific:

- a. Require that the cumulative impact assessment study include all impacted Environmental Justice Communities regionally beginning with Port Communities, Transportation Corridor Communities, Rail Yard Communities and Distribution Center Communities to their final destinations in California and leaving California.
- b. Require that the locomotive train traffic and environmental impact assessment study include all impacted Environmental Justice Communities regionally beginning with Port Communities, Transportation Corridor Communities, Rail Yard Communities and Distribution Center Communities to their final destinations in California and leaving California.
- c. Require that the drayage truck traffic and environmental impact assessment study include all impacted Environmental Justice Communities regionally beginning with

Port Communities, Transportation Corridor Communities, Rail Yard Communities and Distribution Center Communities to their final destinations in California and leaving California.


- d. Require that the Drayage Truck Traffic Study include an assessment of public transportation infrastructure maintenance, repair, replacement and new construction costs that are primarily supporting the private business industry and not the public. This includes local EJ Community arterial support surface streets and sidewalks that are damaged by truck traffic.
- e. Require that the air quality environmental impact assessment study include all impacted Environmental Justice Communities regionally beginning with Port Communities, Transportation Corridor Communities, Rail Yard Communities and Distribution Center Communities to their final destinations in California and leaving California.

12. Hazardous Material Transportation Assessment Study

Request the JPA, Ports and Union Pacific:

Require a Hazardous Material Transportation Assessment Study to assess public risk and emergency response due to an accidental or terrorist attack or train derailment causing a public road blockage, toxic spill, fire, explosion, release of radiation or other dangerous substance.

Respectfully Submitted,



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