

**Community Outreach and Education Program
Southern California Environmental Health Sciences Center
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February 25, 2009

Via E-mail

Sam A. Joumblat
Executive Director
Intermodal Container Transfer Facility Joint Powers Authority
P.O. Box 570
Long Beach, CA 90801-0570
info@ictf-jpa.org

Re: Notice of Preparation / Initial Study – ICTF Project

Dear Mr. Joumblat:

On behalf of the Community Outreach and Education Program of the Southern California Environmental Health Sciences Center at the University of Southern California's Keck School of Medicine, we hereby submit the following comments on the Notice of Preparation and Initial Study for the Intermodal Container Transfer Facility ("ICTF") Project (the "Project").

Our Center is composed of scientists from USC and UCLA, many of whom conduct air pollution health effects and exposure assessment research. Our USC investigators have been conducting a several decade-long study of the health effects of air pollution on the respiratory health of school children known as the Children's Health Study. 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 and are more likely to have reduced lung function.

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, and they are submitted from the perspective of the necessity of protecting the health of all our susceptible populations. These and other relevant studies of air pollution's effects on health have been included in several additional emails with attachments.

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 proposed expansion of the UP 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 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 expanded rail yard are densely populated, contain many schools and other “sensitive receptor” facilities, including a homeless shelter for veterans as well as a school for homeless children, and these sensitive populations are already heavily impacted by the Ports as well as Port traffic to and from the existing Union Pacific Intermodal Container Transfer Facility (ICTF).

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 UP ICTF expansion 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). Thus, special concern should be granted to this population.

1. We request that the EIR evaluate the EJ impacts of sensitive populations living in close proximity to the existing UP ICTF and the EJ impacts of expanding this facility in this particular neighborhood.

2. We request that the EIR answer the following questions:

- 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 the “Haz Mat area” of the site will be (did not seem to be included in the NOP maps)
 - what actions UP or the Ports 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 UP or the Ports anticipate taking to ensure that the locomotives coming and going from the facility will not add additional pollution to the nearby communities.
3. **We request that the EIR detail what is already known about local air pollution and health risks in the area, including studies that have been done at Hudson School by AQMD and other agencies and investigators, the MATES III project — as well as other studies underway —so that the cumulative effects of this project can be accurately analyzed.**
4. **We request that the EIR describe what is know about air toxics in the local community, including any information on toxic air contaminants including 1,3-butadiene, aldehydes, diesel particulate, EC, PM, NOx and other emissions in the local area, at baseline and emission projections with the expanded ICTF in place.**
5. **We request that the EIR consider all AQMD Monitoring Studies in the area.** 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. 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 have been compared to the AQMD monitoring stations. The monitoring shows 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 impacted by air pollution. AQMD Reports #7, 9, and 11 are attached as examples for the record.
- *PM₁₀ measurements.* The AQMD Report #9 on sampling in October – November 2003 and Report #11 on sampling in October - December 2004 both conclude: “The current monitoring and previous monitoring studies indicate that PM₁₀ and EC concentrations measured at Hudson School site are often higher than the other study sites, and higher than many AQMD network sites for PM₁₀.” ... “PM₁₀ averaged 49ug/m³ at Hudson School during the study compared to values ranging from 35-39 ug/m³ 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/m³ (the state's 24-hour standard), with the maximum at Hudson for 24 hours of 71 ug/m³.

Report #11 also states that: For all [11] studies except the fall/winter 2000 study, the Hudson School site exhibited the highest PM10 average.... These trends suggest that Hudson School consistently experiences higher PM10 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 coke dust blowing into the neighborhood from a nearby refinery operation. According to AQMD specialists, by the year 2000 the coke piles were in compliance with mandated mitigation measures, including enclosing the coke piles. Since the year 2000, however, the levels of Elemental Carbon (EC) have not dropped further, with the Hudson School EC levels significantly higher than at other schools and 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. We argue that 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.
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- *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. Note how much higher the levels of elemental carbon at Hudson School were than at other schools in the area. NOTE: the lockout was from September 29, 2002 – October 9, 2002. Note how low the levels of elemental carbon were on October 9, 2002 (less than 4 ug/m³, much lower than normal fall averages). Also, please note how 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. Please see links to AQMD reports in a separate submission.

Note also how levels of Elemental Carbon at Hudson School compare during the lockout and during other years of AQMD measurements. The attached AQMD reports 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. Our conclusion from these various analyses of the AQMD data is that the main “driver” of the elevated Elemental Carbon levels at Hudson School is diesel exhaust from trucks going to the ICTF and from locomotives and other diesel equipment 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. The 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 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.

6. The EIR must detail the significant health effects that the 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 Project.

In particular, we are concerned about the following health-related issues, all of which should be addressed in the EIR. Relevant scientific articles have been separately submitted for the record.

- *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 (NO_x, 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, submitted separately). 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 1/3 miles from the proposed expansion. 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, URL link submitted separately).

- *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; submitted separately). (Please see submitted documents 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 scientific articles). There is so much evidence that the American Heart Association issued a scientific statement in 2004 concluding: "Exposure to air pollution contributes to the development of cardiovascular diseases." PM₁₀ levels are consistently higher at Hudson School than at other sites measures in AQMD studies in the Wilmington/Long Beach area. PM_{2.5} measurements will be collected in the MATES III study of AQMD. The wealth of 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 are more likely to give birth to low-birth weight, premature infants. These studies were done at current levels of exposure.* (Wilhelm, 2005). (Please see submitted scientific articles and linke to the CARB Emission Reduction Plan). Residential areas, including a homeless shelter, are located in the vicinity of the proposed PROJECT east of the TI Freeway and also immediately adjacent to the San Pedro tracks north of Sepulveda. Studies submitted to the ICTF JPA for the record should 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. (Garshick, 2004) The EIR must evaluate cancer risks that will result from the proposed Project, 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 EIR must take into account the thousands of diesel trucks that are currently proposed to enter the Project.. Harbor Commission President David Freeman, at the NOP Scoping Meetings, made it clear that the trucks are to be considered when evaluating the potential risks of this project; any HRA must 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 at the URL on the Appendix A submitted separately). The EIR must evaluate the potential for enhancement of allergies and asthma from the diesel exhaust at the Project 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 submitted for the record. 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.* The EIR must evaluate the noise levels at baseline and projected and evaluate their effects on residents health 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>

In addition, the following issues must be considered:

A. The EIR must reconsider the Project objectives listed in the NOP.

We are concerned that the currently stated objectives of the Project do not consider the full range of alternatives that must be considered in the EIR.

One of the stated Project goals is to “continue to promote the direct transfer of cargo from port to rail with minimal surface transportation congestion and/or delays.” Transporting containers via truck to a rail yard five miles from the Port is anything but “direct transfer.” Direct transfer would be accomplished only via on-dock rail.

Another Project goal is to: “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” Providing near dock rail capacity will not “minimize surface transportation congestion.” If that claim is made, sophisticated and peer-reviewed traffic studies must be conducted that prove that this is the case. Since cargo throughput is forecast to go up dramatically, it is unrealistic to suggest that the proposed Project would replace truck traffic on the I-710 with rail transport. Rather, the more realistic view—and the one that should be reflected in the EIR—is that this increase in throughput (if it occurs) will lead to

additional traffic on all freeways in southern California, including the I-110, I-710 and I-405 and the Terminal Island Freeway. In addition, providing near-dock rail “consistent with the Ports’ Rail Master Study” is insufficient, in that the CAAP calls for maximizing on-dock rail and should take precedence over the rail master study in an EIR.

Another Project goal is to reduce emissions at the ICTF by replacing diesel powered equipment. This goal can be met without expanding the ICTF, by having the Union Pacific railroad reduce the emissions at the existing railyard.

B. The EIR must address a larger range of alternatives than exist in the NOP.

There are a number of alternatives which the EIR needs to evaluate. As outlined in comments submitted by NRDC and others, these include:

- Advanced technology container movement. The Port of Los Angeles is undertaking an RFP process for bids for advanced technology for containers, such as maglev. The EIR should take this into account.
- Electric drayage trucks. The Ports and the South Coast Air Quality Management District are working to develop electric drayage trucks. A prototype was rolled out last year at the Port of Los Angeles.
- On-dock rail. With sufficient new on-dock rail, expansion of ICTF may not be necessary.
- Use of the Port of Los Angeles Terminal Island Intermodal Facility and/or the Port of Long Beach Pier T Mole Expansion (also on Terminal Island) could adequately satisfy the ports’ rail infrastructure needs.
- Zero-emission fixed-guideway alternatives. See the February 17, 2009 letter from the District to the I-710 Technical Advisory Committee.
- Alameda Corridor electrification. As you know, the Corridor was constructed with electrification in mind. Emissions from diesel locomotives leaving the ICTF facility could be reduced if the Corridor is electrified.
- SR 47 alternatives. The SR 47 truck freeway project is now in the EIR process. When considering the cumulative effects of the Project, the SR 47 projects and its alternatives should be considered.

C. The EIR must consider the environmental impacts of the design of the Project.

Diagrams of the project show that additional train tracks are to be built close to homes and schools. This is a faulty design, which will result in greater impacts on residents and school children east of the facility. Clearly, the project should be redesigned so that the most industrial uses (including train tracks for switching) are located on the industrial (western) side of the ICTF.

In addition, the NOP states that the ICTF will not be expanding into the unused Watson land that it says it will no longer use for container storage. This must be a firm requirement and any expansion onto this land in the future must require a brand-new EIR process.

D. The EIR must address the impacts of this Project on the entire South Coast Air Basin, not just impacts at the Project Site in West Long Beach.

The EIR must describe the routes of trucks to the railyard from the Ports and the impacts the trucks will have on communities in San Pedro, Long Beach and Wilmington. Then it must look at the increased volume of train traffic along the Alameda Corridor communities. Finally, as trains wend their way from the Alameda Corridor through downtown L.A. and through California to its eastern borders, the emissions along the way must be calculated – especially when trains stop at rail crossings to let traffic move, or when locomotives have to idle to let traffic pass. These impacts must be accounted for.

E. The EIR must present an accurate environmental baseline, after considering the implementation of all mandated regulations.

The current UP ICTF is a detriment to public health, as described by CARB in its Health Risk Assessment (attached to these comments) and in the summary of exposure assessment prepared by Andrea Hricko (also attached). Taking that baseline and showing that a new yard would improve the situation by adopting new regulations that have been set into place by government regulators is not sufficient. We suggest that the EIR consider the baseline environmental condition of the UP ICTF and then consider what that baseline will be with all regulations current approved in place. This is the “current project baseline with mandated changes” to which the EIR should compare the current project and the new project – with additional changes to be made by UP. The EIR must include a detailed analysis of the current levels of noise, air pollution, light pollution, vibration, as well as traffic conditions, and make a realistic comparison of the environmental impacts of the proposed Project versus the existing conditions. In addition, the EIR must contain documentation to support baseline numbers and sufficient analysis to explain and justify the estimated truck trips, yard activities, locomotive trips, and other activities that will be generated by the proposed Project. We have found, for example in the SR 47 project that sloppy work in traffic counts can greatly change the estimates of impact.

In addition, the local and regional environmental conditions in the vicinity of the proposed Project site must be described and analyzed. All sensitive receptors must be noted, including local schools, housing for homeless veterans, churches, parks, and residential neighborhoods must be recognized and impacts on them analyzed and discussed.

F. The scope of analysis in the EIR must address local as well as regional effects.

The Project says it will lead to an additional 1.5 million truck trips per year though the West Long Beach area and surrounding neighborhoods. There may also be effects on nearby freeways such as

the I-405 and I-710. In addition, a substantial increase in rail traffic is proposed; this increase will have effects on the physical environment in Carson, South L.A., communities along the Alameda Corridor, the San Gabriel Valley, and the Inland Empire as well as locally.

G. The EIR should address all feasible mitigation measures and a new lease for any modernized UP ICTF JPA should require enforcement of all mitigation measures.

The EIR should address electrification of the Alameda Corridor and Alameda Corridor East, since maximizing use of the Alameda Corridor is both a goal and foreseeable result of this project.

One important issue to be considered and analyzed is the enforceability of proposed mitigation measures. All mitigation measures must be written into the lease of the UP ICTF with the ICTF-JPA and other authorities. According to the California Air Resources Board's own analysis and those of the AQMD in their 1158 reports, this facility has polluted the community for more than 20 years, and a new lease must demand that all mitigation measures proposed in the EIR be enforced through a strictly worded lease, with substantial fines or shut-down for failure to abide.

Noise is an important health risk. The EIR must conduct an evaluation to determine whether the current sound wall will attenuate a doubling of container volumes. If not, a new wall must be considered, along with sound attenuating glass and retrofits for homes and schools along the freeway routes to the ICTF and in close proximity to the facility. A careful noise analysis by an independent firm must be conducted to determine what the current noise levels are, what they will be in the future, and what the noise levels mean for the ability to hear teachers and learn in classrooms.

H. The EIR must address future impacts.

The proposed ICTF expansion is intended to facilitate the accommodation of growth up to 300 percent at the ports in the next two to three decades. Thus, the EIR must address environmental impacts of growth at the ports and related increased container movement.

I. The EIR must contain a newly conducted, and independent, comprehensive health risk assessment.

A new Health Risk Assessment should be conducted, with careful scrutiny of planned actions by UP to ensure that they are "real" rather than actions that will be "investigated."

Recent health risk assessment documents by the California Air Resources Board, showing elevated cancer risks for residents living near the UP ICTF, are attached. Since those documents were created by the CARB under an MOU partnering them with the railroads, an independent HRA must be completed that evaluates the health risk not only from activities at and near the Project site, but also from the trucks that would deliver containers to the Project and trains that will use the Project site.

J. Environmental justice impacts must be described in the EIR.

The proposed Project Site is located near two low-income communities of color: west Long Beach and Wilmington. According to the 2000 census, Latinos, African-Americans, Asians, and other non-white ethnicities represent over 85% of the population in these communities. However, the NOP does not make clear that the EIR will assess and mitigate environmental justice impacts. Please consider all detailed demographic data submitted to the Port of Los Angeles as part of NOP comments in 2005, attached.

K. The EIR must include a thorough discussion of clean up of previous hazardous waste spills.

The EIR must explain how UP cleans up hazardous waste spills or diesel fuel spills at the existing UP ICTF and where the hazardous waste goes.

We request that the EIR contain a list of hazardous waste spills at the UP ICTF since its opening in 1986, so that the DTSC can evaluate the site for contamination. Some other yards of Union Pacific in the U.S. that have been closed or abandoned are contaminated or have resulted in vapor intrusion and have required major cleanups.

I request that as part of the EIR, the DTSC be called in to evaluate whether the soil in this facility is contaminated. If it is, and the pavement is going to be torn up for the modernization, there must be a plan for how all nearby residents will be protected. If the land that the UP ICTF now sits on is determined to be contaminated, then we suggest that DTSC must conduct soil sampling in the yards of nearby homes.

L. The Checklist is not accurate and we request that additional items that show “no impact” in the checklist be investigated in the EIR.

See Section 2.0 - Evaluation of Proposed Project – the Checklist

a. “Land Use/Planning” should be checked as an impact. We must consider the impacts on land use adjacent to the ICTF – in this case to the NE and E, which are school and residential. The land on which the ICTF is sited may be industrial but more than ¼ of the adjoining property is not.

b. “Recreation” should be checked. It is not healthy to play and breathe next door to this facility, thus it has a significant impact on recreation. Note the filters by AQMD in the area are only inside schools – children are not protected when they are playing outdoors or “recreating.” Also, along the TI Freeway, children play at the Hudson School yard, all ages use the park, and teens play in the fields of Cabrillo H.S. Toddlers play outside of the transitional daycare center – with trucks heading to the ICTF as their landscape.

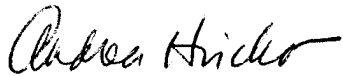
c. “Population/housing” should be checked Agencies doing appropriate land use planning in the 21st century would not consider putting a railyard immediately adjacent to homes and schools,

based on the scientific evidence. Thus, this box should be checked. In addition, the value of homes will decrease due to the expansion of the facility.

d. "Parks" should be checked. The checklist question asks if the project will increase the need for parks. The answer is no. But parks will be impacted because the few parks in this area will be impacted by additional locomotives and trucks. It is not safe to play in parks with hundreds of trucks an hour passing by.

Thank you for your consideration of these comments.

Sincerely,



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