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By Email

Intermodal Container Transfer Facility – Joint Powers Authority
925 Harbor Plaza
P.O. Box 570
Long Beach, CA 90801-0570

Re: EIR of Expansion of Union Pacific ICTF Rail Yard In
West Long Beach, California

Dear Ladies and Gentlemen:

I would like to thank you for the opportunity to comment on the Environmental Impact Report for the above referenced rail yard modernization and expansion project.

As a long time resident on the west side of Long Beach I can tell you that pollution is a serious concern to me. I have lived at my residence on Santa Fe Avenue and Hill Street since 1988. From my residence I am within three blocks of four different schools. Every morning I sweep from my patio the large dirty black particulate that fell from the sky the day before. The asthma rate on the west side of Long Beach is higher than that of the east side of Long Beach. A much higher than average percentage of children at Hudson Elementary and St. Lucy Elementary have asthma. So it's important that we weigh the environmental impact with the economic impact when making these decisions. It is the very young and the very old that are impacted the most seriously from air pollution. The pollution sources for West Long Beach are ships, trains, trucks, cars and refineries. You might say, we on the west side are surrounded and a circle the wagons mentality has provided limited results. The Air Resources Board estimates that 3,700 Californians die prematurely each year due to pollution from the ports and freight transportation.¹ The state also says this pollution leads to:

- 2,830 additional hospital admissions;
- 360,000 sick days for workers; and
- 1.1 million missed school days for children in California.²

¹ California Environmental Protection Agency. "Methodology for Estimating Premature Deaths Associated with Long-Term Exposures to Fine Airborne Particulate Matter in California," March 23, 2008. page 38. Stat estimate goes as high as 6,500 lives.

² California Air Resources Board. "Proposed Emission Reduction Plan for Ports and Goods Movement in California," March 21, 2006. page 2.

I oppose the “near port” rail yard modernization and expansion proposal of Union Pacific Railroad. Operation of the ICTF proposed Project is expected to double the container cargo handled by the facility. The proposed Project will generate additional emissions into the vicinity of the facility due to an increase in the number of trucks (from about 3,020 to 6,300 one-way truck trips per day). Additionally, an increase in trains (from about 13 to 27 trains per day) that travel to and from the site is also expected. The number of locomotives on each train varies depending on the length of the train, but usually averages about four locomotives (engines). The proposed Project may also have an impact on the movement of trains through the Ports and Southern California areas, shifting the numbers and types of trains that travel from the Dolores Rail Yard and other local rail yards. The proposed Project is also expected to use diesel internal combustion engines (ICEs) for air compressors needed at the ICTF. Air quality in the vicinity of the ICTF could be adversely impacted. Operation of the proposed Project, primarily the increase in activity by mobile sources associated with the proposed Project, could conflict with implementation of the applicable SCAQMD AQMP because of potentially significant increases in criteria air pollutants. Over the long term, this is a potentially significant adverse air quality impact. While UP claims they will go green if only they could be allowed to expand, the drastic increase in projected trucks and containers would undoubtedly cause a negative impact on an already polluted residential community.

Expanding the existing rail yard so close to West Long Beach residential homes and elementary schoolyards makes no sense to me when there are alternatives that make economic sense. The present ICTF setup is for the same containers to be unloaded and then loaded again THREE separate times within a twenty-five mile distance before the containers are ready to be sent to their final destination. This may provide jobs but the added cost to the product when it finally gets to the market place really makes this inefficient system an unusable business model. One has only to look at the original purpose and design of the Alameda Corridor to find answers. The corridor was built and designed to take trucks off the road and not just the road north of Long Beach but the entire road leading right to the port. The Alameda Corridor runs directly to the port and was originally designed and built to load the rail cars at the port and rail them out to a central, non-urban, distribution center. I support an on port solution to container shipment. It would make the port more efficient, more reliable and a cheaper option for accepting and distributing imports. Loading rail cars directly at the port allows you to compete more efficiently with the proposed Mexican shipyard that is planned and the plan to widen the Panama Canal, all direct competitor ideas to this project.

The space issues at the port can be solved with ingenuity. If you drive along the port you see large areas of space being occupied as car lots for new imported Japanese cars that have yet to be distributed across America. This space could be better used. A high rise structure could store the same amount of cars using a tenth of the space. The rest of the space could be used as an on-port rail yard that would quickly facilitate the outward distribution of the cars and ship containers. These are alternatives that the EIR needs to research, explore and expand on.

The next issue I would like to comment on is the need for any expansion at all. The ICTF on Willow is not presently running at capacity. The inbound shipment of containers is presently down 25% from last year. The need to increase the ability to handle double to triple the amount of containers is NOT present. We are in a recession and China, our main importer, is feeling the effects of the financial institution melt down as we are. Despite encouragement by the present stimulus package, no one in private business is expanding. They are laying off, cutting fat and hunkering down for the long haul of this recession.

I truly hope you will make the proper decision and the EIR advises against proceeding with Union Pacific's expansion of the West Long Beach ICTF rail yard on Willow Street or in the alternative shelf the EIR altogether for an indeterminate period of time.

Very truly yours,

Jim Larson

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cc: Greater Long Beach ICO