
From: Terry & John Miller [igornla@cox.net]
Sent: Wednesday, February 25, 2009 9:45 AM
To: ICTF JPA; Kathleen Woodfield; Chuck Hart; Jody James; Sandra Genis; andrea hricko; Jesse Marquez
Subject: NOP and Initial Study Intermodal Container Transfer Facility

Comments from John G. Miller, M.D. FACEP on NOP for ICTF:

1. The EIR must analyze the idea of on dock rail as an alternative to the proposed project. On dock rail must be analyzed coequally with the project.

2. The proposed project is to be located near already existing facilities which house or are occupied by sensitive receptors such as children, elderly people, persons with pre-existing medical conditions. The Hudson Street School is an example of this. The project will result in unavoidable significant adverse impacts on air quality both nearby and regionally. Because of these facts, the project must include as a mitigation measure the relocation of all schools, nursing homes, board and care facilities and residences that presently exist within 500 meters of the proposed project.

3. The project creates a large fixed hazardous source of air pollution. This was demonstrated in CARB's (and AQMD's) studies of the Rosemead Railyard Site. The environmental impacts and adverse impacts on the involved communities due to the need for relocation of people and facilities away from this project involved must be studied in the EIR.

4. Because the project will inevitably generate many tons of air pollutions including but not limited to PMs, NOX, SOX and VOCs, I request that the EIR analyze how many deaths this will cause and what the additional burden of expense for medical care for the inevitable victims of this project generated pollution will be to our society. The USEPA has generally agreed upon quantities of the various pollutants that are regarded as being responsible for one premature death. These should be used to calculate how many extra deaths will occur in the South Coast Air Basin due to this project.

5. The overall externalized costs of this project need to be analyzed by a credible outside consulting firm such as Beacon Economics.

5. As a mitigation measure, the above mentioned externalized costs must be paid for by those business entities that stand to benefit from this project at the expense of the surrounding communities and all Citizens living in the South Coast Air Basin. The EIR must include provisions for the creation of a fund to help those who will be harmed by this project.

6. The EIR must contain a section analyzing environmental justice issues created by the proposed project as it appears that this project will have a disproportionate adverse impact on environmental justice communities such as lower socioeconomic communities and people of color.

7 The US Army Corps of Engineers and the Port of Los Angeles must be involved as co-lead agencies in the creation of the EIR as this project will directly interact with various past and presently proposed projects being done by these agencies.

Thank you for the opportunity to comment on this NOP.

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