

US EPA ARCHIVE DOCUMENT

(Sent by email on September 28, 2010)

## Comments on Draft Scoping Document for Los Angeles and Long Beach HIA

Dear U.S. EPA:

These comments are submitted on behalf of the Community Outreach and Education Program of the Southern California Environmental Health Sciences Center, based at the University of Southern California. I applaud the work of those who have written the draft Scoping document of this HIA. Since I was unable to be on the conference call for the HIA, these comments are meant to provide information that I would have offered during the call and working session.

My suggestions are that the following research findings/studies be considered in the next version of the HIA Scoping document (most of which were published over the past year). I believe that at least some of the following are not included.:

1. Air pollution and health effects:
  - a. Air pollution exposure and its link to incident Type 2 diabetes (Kramer 2010, see Environmental Health Perspectives attachment);
  - b. Diesel pollution and its impact on lung function in adults with asthma (see NEJM attachment)
  - c. The role of air pollution in cardiovascular disease [see attached American Heart Association statement on air pollution and cardiovascular disease (2010); see Hinds power point presentation to ARB].
  - d. The link between air pollution exposure and stroke (JC Chen editorial, 2010; Maheswaran, 2010).
  - e. Studies showing that exposure to diesel exhaust (in animal studies) disturbs male reproductive function (spermatogenesis) and testicular function. (1999-2010)
2. Air pollution/exposure monitoring results:
  - a. Nighttime monitoring on the I-710 (Zhu, Hinds)
3. New information on black carbon's potential role in climate change (Ramanathan, 2010; Kopp and Mauzerall, 2010; Ramana, 2010).

In addition, I agree with Jesse Marquez of Communities for a Safe Environment, that 24/7 lighting issues need to be considered as a potential health threat in terms of circadian disruption. (See, e.g., Stevens, 2009)

I also believe that the HIA is missing information about the costs to society of using taxpayers' dollars to build new bridges for goods movement expansion, build a new SR-47 truck expressway in close proximity to homes, repave surface streets due to big-rig truck damage, build grade separations for rail, expand the I-710 to accommodate more truck traffic so that the ports can grow, and to pay for other infrastructure costs that southern California would not have to bear if the Ports were not as large and expansive as they are. If the taxpayer costs for these expansions were put into education, e.g., our

young people might be able to look forward to better and higher-paying jobs than working in a warehouse or a transload center or being a drayage truck driver. This type of lost economic opportunity (granted, very hard to capture) would be valuable for the HIA to examine.

As part of the HIA, I would suggest a GIS analysis detailing the amount of land use/space that "goods movement" activities are taking up in southern California. This would involve an analysis of aerial photos and Google Earth maps to determine the acres that are involved in goods movement activities. Then the analysis would look at other industries (e.g., tourism) to determine the amount of land that would be required, the value to the tax base, and the impacts on local residents (comparatively) with different scenarios. (Pls see Google maps of both Carson and Mira Loma as examples).

Goods movement is completely mobile-source intensive and diesel-exhaust intensive. One might also look in the economic section of the HIA at what difference to health there might be if the tourism or other less polluting industries were encouraged for economic development over the highly polluting goods movement industries that bring trucks into local neighborhoods and build new rail yards next to homes and schools.

I believe that other issues involving land use must be considered in the HIA. For example, is it a good use of valuable southern CA land to be building transload centers and distribution centers all over Southern California on valuable land? Are there other less polluting (in terms of truck traffic) industries/companies that could be built on such valuable real estate?

In addition, the HIA should examine the off-port health and quality of life impacts of proposals by the two ports to build/expand the UP and BNSF intermodal facilities near homes and schools, daycare centers and transitional housing, in Wilmington near West Long Beach. These land use decisions will have dramatic impacts on local residents, if they are approved. The HIA must evaluate such off-port impacts.

Thank you for your consideration of these comments and the multiple attachments. Sincerely yours,  
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Email Attachments:

James MacCreanor, et al "Respiratory Effects of Exposure to Diesel Traffic in Persons with Asthma." *New England Journal of Medicine* 2007;357;2348-58.

Ursula Kramer, et al "Traffic-related air pollution and incident type 2 diabetes: results from the SALIA cohort study." *Environ Health Perspectives* 2010;118:1273-9.

Statement of Dr. Drew T. Shindell, Senior Scientist NASA Goddard Institute for Space Studies, before the Select Committee on Energy Independence and Global Warming United States House of Representatives, Hearing entitled: Clearing the Smoke, Understanding the Impacts of Black Carbon Pollution, March 16, 2010.

Robert E. Kopp and Denise L. Mauzerall "Assessing the climatic benefits of black carbon mitigation." Proceedings of the National Academy of Sciences of the United States of America, approved May 20, 2010.

Statement of V. Ramanathan Scripps Institution of Oceanography University of California, San Diego, before the before the Select Committee on Energy Independence and Global Warming United States House of Representatives, Hearing entitled: Clearing the Smoke, Understanding the Impacts of Black Carbon Pollution, March 16, 2010.

Chad Bailey et al "Mobile Source Black Carbon Emissions." (powerpoint presentation) *Black Carbon Emissions and Climate Change: A Technical Workshop, San Diego, CA* October 13-15, 2004.

M.V. Ramana "Warming Influenced by the Ratio of Black Carbon to Sulphate and the Black-Carbon Source." *Nature Geoscience* Published 25 July 2010  
<<http://www.nature.com/ngeo/journal/v3/n8/abs/ngeo918.html>>.

Robert D. Brook, et al "Particulate Matter Air Pollution and Cardiovascular Disease: An Update to the Scientific Statement from the American Heart Association." *Circulation – Journal of the American Heart Association*, 2010;121;2331-2378, originally published online May 10, 2010.

Doni Hikmat Ramdhan et al "Nanoparticle-rich diesel exhaust may disrupt testosterone biosynthesis and metabolism via growth hormone." *Toxicology Letters*, 2009;191;2-3,103-108.

Jiu-Chiuan Chen "Geographic Determinants of Stroke Mortality: Role of Ambient Air Pollution, Stroke." *Circulation – Journal of the American Heart Association* 2010;41;839-841; originally published online March 25, 2010.

Ravi Maheswaran, et al "Impact of Outdoor Air Pollution on Survival After Stroke: Population-Based Cohort Study." *Stroke* 2010;41;869-877; originally published online March 25, 2010.

Yifang Zhu et al "Comparison of Daytime and Nighttime Concentration Profiles and Size Distributions of Ultrafine Particles near a Major Highway." *Environmental Science and Technology* 2006;40;2531-2536.

William C. Hinds, ScD. "Cardiovascular Response to Freeway Air: Results of an On-Road Exposure Study." (powerpoint presentation) *California Air Resources Board - Chair's Air Pollution Seminar*, January 12, 2010

Ursula Kramer, et al "Traffic-related Air Pollution and Incident Type 2 Diabetes: Results from the SALIA Cohort Study." *Environmental Health Perspectives*, Online May 27, 2010.

Stevens, Richard "Light-at-night, circadian disruption and breast cancer: assessment of existing evidence." *International Journal of Epidemiology* 2009;38;963-970.



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