

US EPA ARCHIVE DOCUMENT

Sept. 22, 2010

Jared Blumenfeld, Administrator
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA, 94105

RE: EPA's Los Angeles and Long Beach Maritime Port HIA Scope: Working Draft

Dear Mr. Blumenfeld,

The Los Angeles County Business Federation appreciates the opportunity to convey our questions and concerns regarding the *Los Angeles and Long Beach Maritime Port HIA Scope: Working Draft* (the Draft Scope) released by EPA Region IX on August 17, 2010.

BizFed represents more than 70 organizations with well over 100,000 businesses employing 2 million people throughout LA County. As you know, the Long Beach and Los Angeles Ports represent significant economic drivers for our region as well as the nation, and play particularly valuable roles at crucial economic times such as today's.

BizFed believes that pursuing Health Impact Assessments (HIAs) within or in parallel to existing and comprehensive environmental review processes will further slow the already complex and lengthy approval processes for infrastructure projects critical to the future health and economy of our region. ***Adding another process to project review could significantly slow the development and approval of vital new infrastructure for the region and risks endangering the local and regional economy.***

California ports and businesses already are leaders on addressing air quality and community impacts. Potential health impacts already re conservatively analyzed under existing CEQA and NEPA processes. We firmly believe that state and local planning agencies, businesses and the Ports have gone to great effort to facilitate public dialogue on transportation planning and projects, and identified innovative solutions for addressing potential air quality and health impacts. The leadership by the ports on both of their environmental plans and community specific programs proves their ongoing commitment to continued progress.

We also believe that local HIAs should not move ahead of federal guidance. The underlying scientific basis and policies on which an HIA would be based are still under evaluation by other branches of federal government, and we are greatly concerned that moving ahead of further guidance and standards will delay and complicate review processes and could spur further controversy on localized community impacts.

Infrastructure development is critical to job creation and economic prosperity. As exemplified by President Obama's emphasis on infrastructure investment to spur the economy, we must continue to find ways to accelerate development, approval, and implementation of projects while maintaining environmental integrity. It is clear there are conflicting directives with imposing a new time-consuming and complicated review processes while the Administration is pushing for quick implementation of stimulus funds intended to get Americans back to work.

Economic status is the strongest indicator of health. As recognized in the Draft Scope, “[i]ncome is one of the strongest and most consistent predictors of health and disease in public health research literature.” International trade is a vital part of our national and local economies. The goods movement industries serving the Ports have invested billions of dollars over the years in local infrastructure, provided hundreds of thousands of jobs, and have generated income to local and state economies and the federal government. Confusing, questionable, and unnecessary duplicative processes like the proposed HIA jeopardize these advances, particularly by adding to California’s already existing, vast regulatory processes.

International trade is a vital economic engine in California and must be allowed to thrive, especially in tough economic times. While we respect the need to carefully evaluate investments in long term infrastructure, we believe the existing methods applied by state and local agencies are sufficiently comprehensive. Thank you for the opportunity to express our views. We look forward to working with the EPA and Administration to ensure forward opportunities that build vibrant and sustainable communities and economies for all of us.

Sincerely,



Thomas Flintoft
BizFed Chair
LAX Coastal Area Chamber



David Fleming
Founding Chair
Latham & Watkins



Tracy Rafter
BizFed CEO
Rafter Group, Inc.