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September 28, 2010

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

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

Dear Administrator Blumenfeld:

FuturePorts appreciates the opportunity to convey our questions and concerns with the *Los Angeles and Long Beach Maritime Port HIA Scope: Working Draft* (the Draft Scope) released by EPA Region IX on August 17th. FuturePorts believes that pursuing Health Impact Assessments (HIAs) within or in parallel to existing 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 extensive, expensive and complex 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.

FuturePorts is an advocacy organization representing the entire goods movement supply chain, and tens of thousands of workers in California. The organization was founded on the principle of balance between our economy and our environment. The goods movement supply chain is the largest generator of jobs in California, and our efforts are focused on finding solutions to challenges facing the maritime industry, and to ensure the continued economic contribution to the cities of Long Beach and Los Angeles, the Southern California region, and to the nation made by the goods movement industry.

California Ports and businesses have been leaders on addressing air quality and community impacts. Health impacts are thoroughly analyzed on a conservative basis under existing CEQA and NEPA processes. We firmly believe that state and local planning agencies, businesses and the Ports have taken great strides to facilitate public dialogue on transportation planning and projects, and have identified innovative solutions for addressing air quality and health impacts from current and future operations. The leadership by the ports on both their environmental plans and community specific programs proves their commitment to continued progress. The success of these programs demonstrates that progress can be made outside of additional resource intensive review processes. There is no need to additionally conduct a separate HIA to achieve this goal.

Local HIAs should not move ahead of federal guidance. The underlying policies on which an HIA would be based are still under evaluation by other branches of federal government. For example, the National Academy of Sciences is working to develop guidance for conducting HIAs,

“to develop a framework, terminology, and guidance for conducting health impact assessment (HIA) of proposed policies, programs, and projects (for example, transportation, land use, housing, agriculture) at federal, state, tribal, and local levels, including the private sector....Based on these considerations, the committee will develop a systematic, conceptual framework and approach for improving the assessment of health impacts in the United States.”¹

We are greatly concerned that moving ahead with separately developing HIAs ahead of further guidance will serve to delay and complicate review processes, and could spur further controversy on localized community impacts.

Infrastructure development is critical to economic prosperity. As exemplified by President Obama’s continued emphasis on investment in infrastructure as a way to spur the economy forward, we must continue to find ways to accelerate the development, approval, and implementation of new projects while maintaining environmental integrity. The areas assessed Draft Scope is purposely broad, and evaluates eight “health determinants,” including 1) a profile of existing health conditions 2) evaluation of potential health impacts, and 3) strategies to manage identified adverse health impacts. Pushing a stimulus project through this process would not be quick or without controversy. How does EPA reconcile the conflicting directives of imposing 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 economy. 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 those directives, particularly since California already imposes vast regulatory burdens on these industries.

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. If you have any questions or concerns, please contact me at 310.982.1323, or on my cell at 310.922.6227. Also feel free to email me at ewarren@futureports.org.

Sincerely,



Elizabeth Warren
Executive Director
FuturePorts

¹ Project View page from the National Academies, last viewed on 9/9/2010, <http://www8.nationalacademies.org/cp/projectview.aspx?key=49158>