



“Air and Environmental Impacts from the Proposed SCIG Railyard”

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Summary of Report by *Green LA Port Working Group*

This summary highlights the major points and conclusions from a study conducted by Clark & Associates on the significant air and environmental impacts from the proposed SCIG Railyard.

Significant Environmental Impacts

The air quality analysis and other studies in the Draft Environmental Impact Report (DEIR) prepared for the Southern California International Gateway (SCIG) cite numerous unavoidable significant impacts from both the project and its alternatives, including:

- **Construction** that would result in **criteria air pollutants** exceeding South Coast Air Quality Management District (SCAQMD) and air pollutant concentrations that exceed local, state and national ambient air quality standards,
- **Operational** exceedances of one or more of the SCAQMD **ambient thresholds** for NO₂, PM₁₀, and PM_{2.5}, and the National Ambient Air Quality Standard (NAAQS) for NO₂,
- Disproportionate effects on **minority and low-income populations** as a result of significant, unavoidable impacts related to **aesthetics, cultural resources, and noise**.

The DEIR states that all of the project alternatives would have significant effects on minority and low-income population. These conclusions are premature and based upon a flawed analysis of the potential health risk impacts on the communities adjacent to the proposed project.

DEIR Flaws

The DEIR was issued prematurely without considering the serious flaws in the analysis of the project; these flaws are replicated in the DEIR, including:

1. Failure to meet the standard for environmental impact reports.
2. Failure to adequately consider the traffic impacts and resulting air quality impacts on the communities immediately adjacent to the proposed project.
 - Since the **baseline** condition is being used to determine the air quality and health impacts, it is critical to have a clear and representative count of traffic conditions at the SCIG site.
 - The DEIR assumes that 95% of truck traffic (current and future) will be going only to the new SCIG facility rather than the Hobart yard. This assumption forces a **regional**

air quality issue (the movement of large numbers of trucks) onto a small geographic area, therefore shifting impact of burden from one area of the Los Angeles Basin to another. There is no legally binding agreement that would prevent the use of both the Hobart yard and the SCIG, therefore the DEIR is based on assumptions.

- Given the unfair burden being placed on the communities immediately adjacent to the proposed project, the proponent should re-evaluate the **impacts from traffic on the local communities** and prepare a new EIR that clearly quantifies impacts from current and future conditions at the site.

3. The DEIR's Health Risk Assessment (HRA) is Flawed and fails to accurately calculate the potential health risks on the residents in nearby communities.

- THE DEIR inaccurately calculates the potential health risks to students attending local schools and to children growing up in the nearby communities as it fails to account for the differences in **childhood exposure**.
- The project is located in a **non-attainment area**, adjacent to an already-impacted residential community and in close proximity to several schools. The average elemental carbon at the Hudson Elementary School was 59% higher than any other study site evaluated in the Long Beach and Wilmington areas.
- The DEIR's analysis of impacts on **students** at nearby schools is incorrectly based on a student's exposure of six hours per day, 180 days per year for six years. There are primary and secondary schools near the project that are attended by local residents for their entire primary and secondary education, amounting to exposure for more than just six years. The DEIR accordingly underestimates the potential impacts to students in the nearby area."
- The analysis does not include factors that take into account the **sensitivity of children to chemicals**. Consistent with guidance from the U.S. EPA and Cal EPA's Office of Environmental Health Hazard Assessment, it is recommended that the EIR incorporate a weighted cancer risk factor of 10 for exposure that occurs from the third trimester of pregnancy to two years of age, and a weighted cancer risk factor of three for exposure that occurs from two years through fifteen years of age.

Fundamental Flaws in SCIG's EIR

1. The DEIR fails to meet the **standards for environmental impact reports**.
2. The DEIR fails to adequately consider the **traffic impacts and resulting air quality**.
3. The DEIR's HRA is flawed and fails to **accurately calculate potential health risks** on the residents in nearby communities.

The EIR needs to be re-analyzed to accurately reflect the impacts on local communities.