

**COMMUNITIES FOR A BETTER ENVIRONMENT
EARTHJUSTICE
NATURAL RESOURCES DEFENSE COUNCIL
SIERRA CLUB**

August 19, 2014

Honorable Mayor & Members of the Long Beach City Council
333 W. Ocean Blvd.
Long Beach, CA 90802

**Re: Hearing 14-0613—Request to Grant Appeal of Port’s Agreements for
Pier G Coal and Petroleum Coke Operations**

Dear Mayor Garcia and Members of the Council:

On behalf of Natural Resources Defense Council, Communities for a Better Environment, and Sierra Club (collectively “Appellants”), we provide this supplemental letter to respond to the thousands of pages that have been submitted by the Port of Long Beach, Oxbow and Metroports since last Tuesday, August 12, 2014. This volume of information, much of it never presented to the Harbor Commission when it approved the project, demonstrates why an environmental review process must be conducted for this project, and why the City of Long Beach should reject the Port’s attempt to skirt its duties under the California Environmental Quality Act (“CEQA”).

While Appellants believe it is a more productive use of time and energy to vet all the facts during the environmental review period Appellants are calling for, we will nonetheless attempt to respond to the documents in the extremely short time period between the time we received them and the City Council hearing on the matter. We have provided a more substantial response to these new arguments and documents in Appendix A, which we incorporate by reference. The key points are as follows:

- The Port has **never** conducted an analysis of the impacts of shipping millions of tons of coal out of Pier G. The Port has ignored the health effects of coal dust blowing off the trains and into the air of communities along the rail route, the greenhouse gas emissions of shipping and burning coal, and the potential for coal dust to spill into the waters of Long Beach. This is in stark contrast to prior projects like Middle Harbor and the Gerald Desmond Bridge, which examined the greenhouse gas emissions impacts of ships, locomotives, trucks, and other equipment, along with other environmental impacts of the projects. The City of Long Beach should reject the Port’s blind decision to approve these agreements to ship millions of tons of coal, and order the Port to conduct the lacking environmental review.

- The City of Long Beach has the ability to affect meaningful environmental benefits for Long Beach by requiring CEQA review. Because CEQA was not conducted for these agreements, the current project does not include many mitigation measures that are common to modern projects at the Port, including shoreside power or alternative measures to control emissions of ships while at berth. While the appendix to the Metroports agreement has some vague language about cooperating with the Port for advanced emissions control technologies, there are no timetables or concrete commitments as would be standard for mitigation measures required under CEQA and as the Port has required for other recent projects.
- A city that wants to maintain its image as promoting environmental sustainability should not fast track the export of products like coal and petroleum coke, and should instead require the Port to conduct a thorough environmental review before moving forward.
- The public and decision-makers have not been provided an adequate process to vet the current agreements. In fact, more information has come out during this appeal process than existed before. It is unproductive to have this information debated in City Council. The City should send these agreements back to the Port, so that these issues can be discussed and debated at the administrative level.

Climate change and the environmental impacts from shipping these products are serious and real. Nobody understands the impacts the freight industry can have on the health and welfare of local communities better than the residents of Long Beach. To make matters worse, as a coastal city, Long Beach will suffer some of the most severe impacts from the consequences of climate change. Given these environmental issues, we need the City Council to stand up for the environment and the community by ensuring that if coal and petroleum coke are going to be exported, it is done only after evaluating the environmental consequences on our climate, on our air, and on our water. We appreciate your consideration of this appeal.

Sincerely,



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