

Existing rail
yard owned
by Union
Pacific

BNSF SONG rail yard (proposed)

Hudson K-8
School

Community
Park

Cabrillo H.S.
sports fields

Long established
& stable West LB
neighborhood –
very ethnically
diverse

Transitional
(homeless)
daycare center
villages at Cabrillo
housing for
homeless veterans



BNSF SCIG Draft EIR Concerns

The proposed BNSF Southern California International Gateway (SCIG) is one of two proposed railyard projects in the West Long Beach vicinity. The SCIG is a new proposed railyard, whereas the proposed Union Pacific International Container Transfer Facility (ICTF) is a proposed expansion to the existing facility. Residents and neighboring community stakeholders, such as students and teachers, want the railroads to first clean-up and green-up their current operations before deciding to expand or create new facilities to demonstrate that they are good neighbors, yet they have not done so. The most recent cargo forecasts shows a delay in the need to increase capacity for cargo therefore giving the Ports more time to adequately assess all alternatives. This is one project that is being proposed that is a part of a larger goods-movement plan here in the South Coast Basin that is troubling including: I-710 expansion, I-710 extension, E-W Corridor, ICTF, Pier S, Hobart railyard, etc., and the cumulative impacts of this large goods movement plan is troubling. The SCIG project as is currently proposed is unwise and the DEIR deeply flawed.

Capacity can be met with less risk to Long Beach. The purported need for the project is to have capacity for forecasted direct rail shipments after the currently-planned on-dock rail system is (according to the DEIR) maxed out in 2020. BNSF claims that capacity for roughly another 2.7 million TEUs will be needed between 2020 and 2035. *See Appendix G-2, page 2.*

Thus, the fundamental question is whether on-dock capacity for direct rail shipments amounting to 2.7 million TEUs can be found after 2020. We believe that it can and must be.

There are alternatives. The DEIR gives scant consideration to two alternatives that could be game-changers: on-dock rail and zero emission container movement.

On-dock Rail. There is no logistical necessity for SCIG to be replicated, inch for inch, on-dock. The rail capacity does not all have to be located on one plot of land, but can be spread over different parts of both ports. It is the excess capacity represented by SCIG that needs to be analyzed in the DEIR -- but it is not.

The entire technical analysis of on-dock rail in the DEIR is 4 pages, buried in Appendix G2. This study claims that the San Pedro Bay ports will have an on-dock capacity of 12 million TEUs in 2035, and thus the excess represented by SCIG is an additional 23%. Most of the 4 pages in Appendix G-2 are devoted to describing the results of a modeling exercise of rail traffic delay, assuming that SCIG will be built as planned. There is not a single word in this study that analyzes whether additional on-dock capacity can be found anywhere in the POLA-POLB complex. As a basis for summarily rejecting the on-dock alternative (*see pages ES 14-15*), this will not pass in court.

Zero Emission Container Movement. During the public hearings for the Notice of Preparation for the SCIG project, the then-chair of the Harbor Commission said that there would be no diesel-powered drayage of containers from the Port to the project site, that alternatives would be found by the five new commissioners. Yet, in the DEIR, zero emission container movement technology is not even mentioned by name as an alternative. *See page ES-14.* The DEIR concludes that these technologies "are not yet viable as alternatives to truck-based drayage"*See page 2-51.* Under the analysis of the DEIR, the SCIG project will not be needed until 2020, if then. A legally-defensible analysis would consider whether zero emission container movement technology could begin to be phased in by 2020. But that study was not done.

Similarly, it commits nothing more to leaner truck technology than to comply with the Clean Trucks Program (CTP): zero-emission and hybrid trucks are deemed “technically infeasible” (3.2-79), and while noting that the CAAP promotes “Alternative Fuel Infrastructure for Heavy-Duty Natural Gas Vehicles” (3.2-64), it fails to consider requiring the use of natural gas trucks—even though these cleaner trucks are available and affordable today, and making 7% of all port truck moves. Meanwhile it claims cleaner air by comparing CTP-compliant trucks with pre-CTP dirty trucks of 2005.

Permanent jobs will be lost. An article on Contra Costa Times on December 3, 2011 mentions that existing businesses at the proposed site provide more than 1,200 permanent jobs, and more during peak seasons, while the SCIG facility is promising only 400 permanent jobs, resulting in an overall reduction in the number of net jobs.

Inadequate traffic study. The baseline for a CEQA analysis is generally the date of the Notice of Preparation, which was 2005. Here, with no reason given, the traffic studies that back up the CEQA baseline were conducted in 2007 and 2009. Moreover, the traffic counts were conducted on a total of two days in the winter, hardly a representative sample.

Moreover, the DEIR consultants did not obtain precise data on truck movements from the largest truck operator on site in 2005: Cal Cartage. We have obtained Cal Cartage's data for 2006 and it shows that the traffic baseline in the DEIR has been grossly inflated.

Meanwhile, the DEIR understates the ongoing emissions of current tenants of the site. It assumes that emissions from current tenants, which are included in the baseline, simply vanish when these businesses are displaced. For example, though it currently operates on 104 acres, “California Cartage would be relocated to the 10-acre site and would retain the current [19] acre parcel on SCE land, comprising a total of 29 acres. All future year activities of California Cartage ... were assumed to be scaled down by 72 percent...” (3.2-29). For five of the nine current tenants, no continuing operations are calculated—perhaps they simply go out of business.

SCIG won't ease traffic on the 710. Although truck traffic to the Hobart Yard is included in the baseline, it is not included in projections of future truck traffic. This could only be valid if BNSF committed never to truck cargo to the Hobart Yard in the future – a promise that they will never make. This error concerning the Hobart Yard, combined with the improperly high baseline, makes the entire traffic analysis worthless. And it is the basis of false claims that the SCIG will take trucks off the 710.

The SCIG DEIR claims that the project will take 2 million truck trips per year off the I-710. But CalTrans is preparing a DEIR on a greatly expanded I-710, which it claims is necessary to handle increased truck traffic from the ports. This inconsistency needs to be clarified.

Inadequate air quality analysis. If the traffic analysis is invalid, then so are the air pollution study, the health risk analysis, and the cumulative impacts analysis that are based on it.

The DEIR ignores more than 30 studies that show lung cancer in workers exposed to diesel exhaust. Those studies are the basis for California naming diesel particulate matter as a Toxic Air Contaminant.

Two of the USC papers (Gauderman, McConnell) on the health effects of children living in close proximity to traffic-related pollution are in the References, but there is no mention of USC and other scientists' whole body of near-roadway and health effects research in the DEIR. There is no mention in the text about proximity issues and health except with regard to CARB land use guidelines.

The cancer risk is greater than 10 in a million. Table C3-7-4, on page C3-50, shows maximum health impacts associated with the mitigated proposed project. Even given the unsupportably-low air emissions study results, this table shows maximum cancer risks of:

- 48 in a million for residential receptors,
- 39 in a million for occupational receptors,
- 40 in a million for sensitive receptors, and
- 60 in a million for students.

All of these risks are in excess of the 10 in a million threshold that the Port has promised not to exceed under the CAAP. This shows that local residents and their children will be the worst off, a fact that should have tremendous significance in the environmental justice section of the DEIR. The DEIR downplays these numbers by asserting that cancer risk will be reduced by the project (due to the indefensible claims it makes about Hobart Yard not handling international cargo any longer) but this claim is unsupportable because of the gross errors in the traffic analysis that we have described above.

These significant risks make even more intolerable the lack of adequate mitigation measures.

Global warming pollution is ignored. BNSF attempts to shrug off its responsibility for global warming pollution (GHGs) and makes no attempt to quantify GHG mitigations—in contrast to POLB's approach which is directing millions into a GHG mitigation fund from its projects.

The meager "mitigations" offered don't even get at the main sources of GHGs, such as trucks and trains (3.6-26). Even solar panels are put off for "future" consideration, rather than integrated into the design of the facility. The project accepts no responsibility for cleaner energy, trying to pass the buck onto the port.

Despite finding that the "best available information" indicates that sea-level rise due to global warming is expected to inundate "a vast majority of the Port" (3.6-27), it rejects out of hand any adaptation strategy for the site or contribution to adaptation for the larger port complex.

This underscores the need for a meaningful GHG reduction plan for the ports, since GHGs are not covered in the CAAP, but that doesn't excuse the DEIR's utter failure to address this key issue.

The Environmental Justice analysis is inadequate. The Environmental Justice section of the DEIR shows that the proposed project will be situated in a predominantly low-income, minority community, while reasonable alternatives are brushed off by the DEIR's authors. This fact has very serious legal and policy implications. In addition, the DEIR admits that the project will have significant impacts related to air quality, but claims, without substantiation, that these impacts "are not linked to localized health effects ...". See page 6-13. This unsubstantiated claim is not backed up by any data, and in any event is unsupportable because the air emissions study is invalid, as discussed above.