



The Port of
LONG BEACH

San Pedro Bay Ports Clean Air Action Plan

April 15, 2010

Thomas Kelly
U.S. EPA Region 9
Environmental Review Office (CED-2)
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Kelly:

The ports of Long Beach and Los Angeles would like to thank the U.S. Environmental Protection Agency (EPA) for considering our input on the proposed Health Impact Assessment (HIA) process and for incorporating important information on current port programs and initiatives into the draft scoping document. We regard the EPA as an important partner to the ports, and we look forward to a collaborative approach on this effort as well.

The ports understand that community health is a significant concern for the EPA, and we share EPA's objective to minimize impacts from port operations. Through the CEQA and NEPA process, the ports conduct extensive evaluations of project-related environmental and community impacts, and – as noted by stakeholders at the HIA scoping meeting – produce some of the most comprehensive and transparent environmental assessments, including health risk assessments. The ports have also just released the San Pedro Bay Ports 2010 Clean Air Action Plan Update with unprecedented long-term goals for emission and health risk reduction.

In addition, the ports have made positive contributions to the community beyond project-specific mitigation requirements and have proactively developed wide-ranging community outreach programs designed to encourage public dialogue and participation in port plans and programs, the details of which have been previously provided to the EPA.

That said, the ports look forward to working with EPA to improve on and augment our existing programs, plans and initiatives. In order to do so, the ports need clarification of EPA's concerns and objectives, and we need to better understand how our existing health assessments and community programs may not achieve EPA's expectations: What questions remain unanswered? What does the EPA ultimately hope to accomplish through the HIA scoping process and how might the findings be used?

The ports hope the draft HIA scoping document will answer these questions and more definitively characterize the EPA's objectives. The ports see this document as an opportunity to encourage discussion on potential gaps in our existing health assessment methodologies and community programs and to identify ways of enhancing or expanding these approaches.

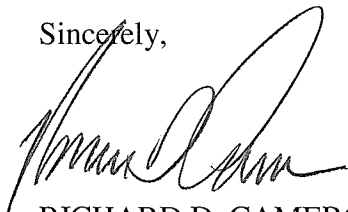
In addition, the ports hope the scoping document will introduce various tools and options for evaluating community health and port impacts: Is an HIA the only approach? Is it the best approach? More importantly, given the comprehensive assessments already conducted by the ports, the flexibility within those existing assessments, and the extent of our community outreach programs, is an HIA necessary? Could the ports achieve EPA's and the community's objectives in a more effective, and potentially less duplicative, way by integrating HIA goals into our existing processes or scaling and enhancing those processes?

Lastly, the ports encourage EPA to use the HIA scoping process as an opportunity to address public health impacts from a more expansive, regional perspective. The ports believe this process should examine all of the major contributors to environmental pollution and involve a cross-section of agencies, community representatives, organizations and industry. The ports feel this broader perspective will enable EPA and the public to fully understand the regional health impacts on the community and to develop collaborative, large-scale solutions involving multiple partners.

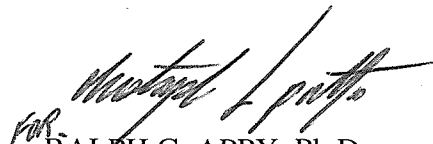
In light of these outstanding issues, the ports urge EPA not to make specific recommendations in the draft HIA scoping document. Rather, the ports request that EPA reconvene the HIA stakeholder group to review the preliminary findings, to communicate clearly what the ports are already doing, to discuss possible next steps and to obtain feedback before proceeding with more formal recommendations in the final document. Another stakeholder meeting will also give EPA the opportunity to articulate its vision for the scoping document and HIAs in general, specifically identifying how they might be used in the future.

Once again, the ports would like to thank the EPA for considering our feedback, and we look forward to collaborating with EPA on comprehensive solutions to the environmental and health issues in our region.

Sincerely,



RICHARD D. CAMERON
Director of Environmental Planning
Port of Long Beach



RALPH G. APPY, Ph.D.
Director of Environmental Management
Port of Los Angeles

cc: Enrique Manzanilla, EPA
Steven John, EPA