

April 29, 1011

Erin Strelch, Environmental Review Coordinator
City of Los Angeles, Dept of City Planning
200 N. Spring Street, Rm 750
Los Angeles CA 90012

Subject: Comments Submittal RE Case ENV-2011-0623-EIR, Wilmington Relocation Project

Dear Erin Strelch,

Please receive and consider the comments below filed by the EIR Subcommittee of the Port of Los Angeles Port Community Advisory Committee as recognized by City of Los Angeles Charter Resolution to review Environmental impacts of Harbor area Projects such as the Wilmington Infrastructure and Relocation Project.

- 1) We consider this project to be Port related as it meets the simple nexus criteria that, If the Ports were not here, this infrastructure would not be here and this project would not be contemplated.
- 2) Please define and quantify all health risks associated with present day operations of the facilities being modified or expanded by this project.
- 3) Define and quantify all health risks anticipated from any future operations of this project.
- 4) If overriding considerations will be invoked to gain approval of any phase of this project, please provide specific quantitative analysis that would support the use of said overriding considerations and please demonstrate how the economic benefits are greater than economic costs such as premature loss of life due to the health impacts of this project.
- 5) Please complete an area-wide Health Impact Assessment of baseline conditions in the areas anticipated to be impacted by this project, especially for air pollution impacts due to project operations.
- 6) Please consult with the Los Angeles County Department of Public Health and the U.S. Environmental Protection Agency who previously called for a Health Impact Assessment for all Port related activities.
- 7) Please consult with Professor Manuel Pastor and other experts at USC concerning the Environmental Justice issues raised by this project. We assert that this project does indeed raise serious environmental justice issues. For example, populations of persons in disadvantaged and minority groups are likely to be disproportionately affected by this project.
- 8) Consider impacts from increased risk of land movement to which the affected area is exposed due to inherent land/soil conditions and years of landfill placement.
- 9) Extend Comment Period by two months to ensure adequate notification and opportunity for thoughtful comments submittal by the affected Public.
- 10) Require all facilities and associated infrastructure to be upgraded to best available technology.
- 11) Define and publish the specific quantification of increased storage and throughput capacities over current capacities.
- 12) Define and publish the specific quantification of increased exposure to risk resulting from expanded capacity for handling of hazardous materials (e.g., hazard overlay or footprint).
- 13) State precisely and objectively all types of hazardous materials that may be stored in the Project area.

We appreciate your consideration of our comments and to resolution of the above requests in the Environmental Impact Review.

Signature on file

Dr. John Miller
Chair, Environmental Impact Review Subcommittee
Port of Los Angeles Port Community Advisory Committee

Copies To: Councilwoman Janice Hahn, City of Los Angeles Council District 15; Port of Los Angeles Board of Harbor Commissioners; POLA Port Community Advisory Committee Members

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