

HEALTH IN ALL POLICIES: SCIG PROJECT DEIR COMMENT LETTER

LOS ANGELES, CA

Healthy Public Policy and Environmental Review

The National Environmental Policy Act (NEPA) and state-level environmental review acts (e.g., the California Environmental Quality Act, CEQA) call for the consideration of health in the environmental review process. Yet, environmental impact reviews rarely include a systematic approach to identifying, analyzing and mitigating project or program effects on human health. A more comprehensive analysis of health could include a description of the affected environment related to health; a determination of direct, indirect and cumulative impacts of the proposal; mitigation measures; and a discussion of disproportionate health impacts on vulnerable populations.

In the absence of a more robust public health analysis, a key way for affected communities and public health advocates to improve the consideration of health in environmental impact assessment is to weigh in through the public process. There are several opportunities in the public process to compel project proponents to improve health analyses and better integrate health considerations. Health advocates can recommend that project proponents analyze specific health outcomes and determinants while the environmental review scope is being determined, they can suggest certain types of analyses, direct the proponent to specific health evidence or data that should be considered, or provide a critique of health and health-related analyses and conclusions during the draft and final comment periods.

The Project

Human Impact Partners reviewed the Los Angeles Harbor Department's Draft Environmental Impact Report (DEIR) for the BNSF Southern California International Gateway (SCIG) project. The proposal under study was an intermodal rail facility near the Ports of Los Angeles and Long Beach where international cargo containers would be transferred onto trains bound for inland destinations. On behalf of community partners, HIP provided a comment letter in response to DEIR findings, about the health evidence, potential impacts of the proposed project, and potential implications of the rise of transloading practices for the DEIR findings. While the DEIR predicted an increase in truck trips to the SCIG facility, our analysis also predicted a rise in the number of transloaded containers and a continued high volume of trucks on nearby freeways and roads. Because these changes in truck traffic will have implications for air quality and noise levels and associated health outcomes, further health information and analyses needs to be considered and included in the EIR.

Outcome

This project highlighted additional evidence and analyses that should be included in the Environmental Impact Report, and supported analyses that identified potential flaws in EIR assumptions, the result of which could be substantial impacts to health. The letter was submitted to the public record and was considered with other public comments. The project also built relationships with our community partners and continued HIP's focus on the health consequences of goods movement.

Health in All Policies Context

- Insufficient time to conduct a full Health Impact Assessment (HIA) to inform the decision-making process
- Project timeline too far along and decision-makers potentially not open to the results of a full HIA
- Lack of resources to conduct a full HIA

