



Los Angeles Area
Chamber of Commerce

September 17, 2010

Jared Blumenfeld, Administrator
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA, 94105

RE: EPA's *Los Angeles and Long Beach Maritime Port HIA Scope: Working Draft*

Dear Mr. Blumenfeld:

On behalf of the Los Angeles Area Chamber of Commerce, representing over 1,600 businesses, I am writing to express concern with the *Los Angeles and Long Beach Maritime Port HIA Scope: Working Draft* released by EPA Region IX on August 17th. We believe that pursuing Health Impact Assessments (HIAs) within or in parallel to existing comprehensive environmental review processes will further slow the already complex and lengthy approval processes for infrastructure projects critical to the future health and economy of our region.

Potential health impacts are currently analyzed under existing CEQA and NEPA processes. State and local planning agencies, businesses and the Ports have taken great strides to facilitate public dialogue on transportation planning and projects, and have identified innovative solutions for addressing potential air quality and health impacts from current and future operations. Adding another layer of review ahead of federal guidance will delay the development of jobs and needed investments in our infrastructure.

Trade is a vital part of our national and local economy. The goods movement industries serving the Ports have invested billions of dollars over the years in local infrastructure, provided hundreds of thousands of jobs, and have generated income to local and state economies and the federal government. California already imposes numerous regulatory requirements on these industries; duplicative processes like the proposed HIA will serve to further hamper our region's economic recovery.

We must continue to find ways to accelerate the development, approval, and implementation of new projects while maintaining environmental integrity. While we respect the need to carefully evaluate investments in long-term infrastructure, we believe the existing methods applied by state and local agencies are sufficiently comprehensive. If you have any questions, please contact Jessica Duboff at jduboff@lachamber.com or 213.580.7558.

Sincerely,

Gary Toebben
President & CEO