From: Wahl, Daniel E.
To: Marx, Joshua A NWK;
Subject: Request For A Full Environmental Impact Statement and Health Risk Assessment On Proposed Gardner Intermodal Facility
Date: Sunday, August 09, 2009 9:03:55 PM

Dear Mr. Marx,
I am requesting that the Army Corps of Engineers reevaluate the permit for BNSF's intermodal facility in Johnson County with a full Environmental Impact Statement. The Environmental Assessment submitted is insufficient in its analysis of the true impact of this project on Johnson County, the surrounding counties, Kansas City and particularly the Hillsdale Watershed. The Corps' analysis has been too dependent on analysis from environmental consultants paid by BNSF. There needs to be an independent Environmental Impact Statement not controlled by BNSF.
Some significant flaws in the Environmental Assessment:
The number of trucks and trains estimated for the site and the estimates of idling time appear inaccurate. Notably, the number of trucks is grossly underestimated per the initial HDR report. Also, the large increase in truck traffic across Johnson County and the metro area forcing the Kansas City basin air quality standards into non-compliance levels has not been addressed.
Further, the air samples taken from the Argentine site are not on-the-ground monitors and they are for a facility that is not comparable to the proposed facility; these readings have produced an air quality model that underestimates the likely emissions for the proposed facility. Many studies have established the serious risk to human health from diesel emissions. The concentration of "priority pollutants" in the air has potentially serious consequences. Yet, no data was submitted for diesel plume dispersion by prevailing winds across Johnson County and the Kansas City metro area or for deposit amounts on my nearby house, the nearby high school and middle school. Harmful effects are certain with the settling of a diesel plume over my two small children (ages 18 months and 3 years old), school children and local residents. A Health Risk Assessment is needed to address the full impact the facility would have.
With the proposed site involving the destruction of a stream and other wetlands that feed into Hillsdale Lake, a source of drinking water for tens of thousands of residents in Johnson and Miami Counties, a full Environmental Impact Statement is needed to ascertain the threat of contamination to drinking water. In addition, the proposed mitigation measures are inadequate to restore the aquatic life that would be destroyed and have not fully addressed the streams that are feeding into Bull Creek. The intermodal facility does not require water on-site to exist; there should be more analysis of alternative sites that do not involve the destruction of wetlands.
I am requesting a full Environmental Impact Statement and Health Risk Assessment.
Sincerely,
Daniel E. Wahl
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Jennifer
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