



Friday, March 15, 2024

Michael Cano
Executive Officer
Countywide Planning and Development
Los Angeles County Metropolitan Transportation Authority (LA Metro)
One Gateway Plaza, MS 99-13-1
Los Angeles, CA 90012

Re: Comments on the draft Long Beach-East Los Angeles Corridor Mobility Investment Plan

Dear Mr. Cano,

Like Southern California's other freeways, Interstate 710 has become a defining force of its adjacent communities. Unfortunately, since its inception, Interstate 710 has always prioritized goods movement and economic considerations over public health and other community needs. As a result, freeway-adjacent neighborhoods have long endured significant pollution burdens. Southern California is already [home to the smoggiest air in the nation](#); so much so that the region has persistently violated National Ambient Air Quality Standards (NAAQS). Communities living near Interstate 710 are [exposed to even higher levels of pollution](#) – namely, carcinogenic diesel particulate matter.

The demise of the proposed expansion of Interstate 710 and the development of the Long Beach - East Los Angeles Corridor Mobility Investment Plan present an opportunity to improve regional transportation while also addressing community needs and air quality obligations. Rather than following California's long-followed orthodoxy of "adding just one more lane" and encouraging more driving, LA Metro can and should instead prioritize the communities impacted by the freeways. While many of the draft plan's proposed projects, such as increased transit services and complete streets infrastructure, are laudable, LA Metro needs to provide further clarification and safeguards to ensure community needs are met, civil rights protected, and Clean Air Act transportation conformity requirements fulfilled.

We appreciate LA Metro creating numerous opportunities for public input and discussion in the development of the LB-ELA Corridor Mobility Investment Plan. This process included many meetings and a lot of hard work by LA Metro staff and project consultants. We also understand that more opportunities for engagement are ahead, both in terms of finalizing the Corridor Mobility Investment Plan and its implementation. Yet, the plan is currently at a critical stage of development. LA Metro must use this moment to ensure the Corridor Mobility Investment Plan truly addresses the region's longstanding environmental inequities. To this end, we offer these comments:

- **The Corridor Mobility Investment Plan must be designed to address the main reason we are here: the harm from unhealthy air in the Interstate 710 communities and Southern California as a whole.**

In creating and implementing the Corridor Mobility Investment Plan, it is important to remember why we are here in the first place: the persistent environmental justice issues plaguing freeway adjacent communities, as well as the detrimental impacts Option 5C would have wrought. [As noted](#) by the United States Environmental Protection Agency (US EPA), expanding Interstate 710 would have illegally worsened air quality (and violated the Clean Air Act) even if the I-710 Clean Truck Program had been fully implemented. In other words - if every truck on a widened Interstate 710 were a zero-emissions vehicle, increases in tire, brake and road dust would still create unacceptable levels of air pollution. Further, US EPA has [just tightened](#) the standard for particulate matter (PM) and is [considering rejecting](#) the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan due to its inability to meet federal air quality standards. These developments underscore the need for any plan to reduce vehicle miles traveled (VMT), improve air quality and address community needs rather than prioritizing economic considerations.

It is also important to remember that failure to meet National Ambient Air Quality Standards (NAAQS) carries significant risks that not only puts public health in jeopardy, but also threatens the regional, and potentially, national, economy. If SCAQMD and the California Air Resources Board (CARB) are unable to demonstrate a viable pathway towards meeting air quality standards, US EPA can withhold almost all federal transportation funding, require two-to-one pollution offsets for new and expanding businesses, place hefty non-attainment fees upon stationary sources of air pollution, and impose a Federal Implementation Plan (FIP). FIP actions will likely include no-drive days for heavy-duty trucks and a loss of local control over air quality regulation. [Transportation is the largest source](#) of air pollution in California and attaining federal clean air standards will not be possible without reducing transportation-related emissions.

- **We remain concerned about the large number of highway-related projects and funding allocations in the proposed Corridor Mobility Investment Plan. LA Metro needs to provide more detail about the nature of these projects.**

We are concerned that the Corridor Mobility Investment Plan includes many highway-related projects. Of the more than forty initial projects identified for funding, at least sixteen are related to interchanges, auxiliary lanes or other highway projects. Similarly, the largest single investment category is for "Freeway Safety and Interchange Improvements." These projects are undefined and largely conceptual, which makes it impossible to provide informed and substantive feedback. We appreciate LA Metro's commitment to hold community hearing sessions to determine the design of these projects. We also appreciate LA Metro's public commitment to focus on improving smaller interchanges rather than constructing large projects focused on capacity

expansion. Still, the lack of specific information about the scope of these projects prevents us from endorsing the entire plan.

We do not oppose projects that are truly rooted in safety, such as improving lane and interchange geometry. LA Metro, however, should not use these projects as an opportunity to increase highway capacity. [Caltrans's policies](#) for California Environmental Quality Act (CEQA) analyses state that within an MPO area, a project that results in an increase in VMT in comparison to a no-build scenario, "will generally be considered significant" and require mitigation. Of particular concern is the potential to discreetly expand Interstate 710 through auxiliary lanes and freeway interchange to freeway interchange "gap" closures. While auxiliary lanes help moderate traffic flow and merging, multiple chained, long auxiliary lanes can result in de facto freeway expansion. This is an approach that LA Metro should avoid.

- **We strongly support proposed investments that will improve transit access and service as well as complete streets projects. We also support funding for community-based programming and LA Metro's plans to partner with local organizations.**

As already stated, California and the Los Angeles region must reduce transportation-related pollution. To achieve this, we support meaningful improvements to public transit, active transportation, and micromobility. These investments are imperative if Southern California is to reduce VMT and transportation-related pollution. The same can also be said for complete streets projects that are built around active transportation and clean mobility (rather than merely adding rudimentary infrastructure to a widened street as an afterthought).

We also support projects that have environmental justice benefits, such as the Shoemaker Bridge Replacement Project. This bridge replacement project will realign the Shoreline Drive/Interstate 710 connector in downtown Long Beach that currently cuts off disadvantaged, park-poor neighborhoods from much needed greenspace. Lastly, we support programmatic investments that address health, economic and other needs in communities along the Interstate 710 corridor. To this end, we encourage LA Metro to work with and foster community-based leadership to ensure residents of the corridor communities have ownership in and enjoy the direct benefits of these investments.

- **Many, if not most, of these projects are off-the-shelf and have been "in the works" for some time. LA Metro needs to provide more information as to what these proposals were originally attached to, and which projects are designed in response to Taskforce and Community Leadership Committee discussions.**

While it is understandable to have an extensive list of projects ready for the Corridor Mobility Investment Plan, LA Metro should be transparent about the origin of these projects and be careful to not crowd out community initiatives. Otherwise, the Corridor Mobility Investment Plan could ultimately serve as a wish list of previously unfunded LA Metro priorities rather than addressing community needs. Additionally, many of these proposals are likely tied to other projects. As such, LA Metro needs to be clear as to which of these proposals are part of other projects (and what those projects are), and which proposals were developed specifically in response to the Corridor Mobility Plan development process.

- **Should LA Metro create a congestion pricing system, it must minimize impacts on low-income residents. Further, congestion pricing underscores the need for high-quality, affordable and safe transit and mobility options.**

We understand that congestion pricing proposals require much thought and consideration. Currently, corridor-adjacent communities subsidize the costs and impacts of vehicular traffic through poor health, shortened lifespans, and a degraded quality of life. A well-designed, equity-focused congestion pricing system would instead shift this cost away from these vulnerable communities. A poorly designed system, however, could increase costs for low-income residents who must drive for work or to access basic goods and services. As such, any congestion pricing system must carefully consider how to minimize, or preferably, eliminate impacts on low-income households. Failure to do so would, at best, negate the benefits realized from congestion pricing, and at worst accelerate displacement due to increased transportation costs. Additionally, congestion pricing underscores the need for public transportation, active transportation, and micromobility investments, as people will need safe, clean and reliable alternatives to driving.

- **The Corridor Mobility Investment plan should clarify that Pacific Harbor Line (PHL) is independent of Union Pacific and BNSF. Additionally, Metro should consider including multiple zero-emission rail technologies as part of its investment strategy.**

Perhaps unintentionally, the draft Corridor Mobility Investment Plan seems to assume Pacific Harbor Line is part of Union Pacific and/or BNSF. Specifically, Project LB-ELA_0217: Freight Rail Electrification Pilot Project states:

“Work with the Union Pacific (UP) and Burlington Northern Santa Fe (BNSF) railroads to continue to develop and test various battery electric locomotives for operation **on the Pacific Harbor Line** and in the Alameda Corridor, with an ultimate goal of advancing a ZE technology capable of entering commercial, revenue service operation.”

We support efforts to deploy zero-emission locomotives and have long pushed Union Pacific and BNSF to deploy their cleanest locomotives to Southern California. PHL, however, is a separate Class III short line railroad that is not part of Union Pacific or BNSF. It is also worth noting that PHL has been proactive in reducing emissions and is currently engaged in projects to test and demonstrate zero emissions locomotives. As such, the Corridor Mobility Plan should clarify PHL's status as an independent operator and partner in the implementation of the Plan. Additionally, LA Metro may want to consider other zero-emission locomotive technologies as part of the Plan as heavy-duty freight rail is a "hard-to-electrify" sector.

Thank you for your consideration of our comments. We again want to express our appreciation for the numerous opportunities for public comment and involvement. We recognize that, even as a draft document, the Corridor Mobility Investment Plan is an improvement over the original Option 5C proposal. We hope LA Metro uses these and other community comments to improve and strengthen the proposal and create a plan that will both transform and empower the communities along the Interstate 710 Corridor.

Sincerely,

A handwritten signature in cursive script, reading "Christopher Chavez". The signature is fluid and stylized, with a long, sweeping underline that extends to the right.

Christopher Chavez
Deputy Policy Director