



March 28, 2024

via electronic mail

Michael Cano, Executive Officer
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Re: Long Beach-East Los Angeles Corridor Mobility Investment Plan

Dear Michael Cano and Project Team Staff,

On behalf of the undersigned organizations, members of the Coalition for Environmental Health and Justice (“CEHAJ”), and Long Beach Residents Empowered (LiBRE), we submit this letter to raise aspects of the Draft Long Beach-East Los Angeles Corridor Mobility Investment Plan (“Draft CMIP”) we support in concept, as well as specific concerns that threaten an extensive public process that Metro and Caltrans went through when devising priorities along the I-710 South corridor (“Corridor”).

I. Introduction.

The communities along the Corridor have experienced heightened pollution burdens, health impacts, unemployment, and housing instability since the creation of the I-710. For over two decades, the major Corridor study on I-710 loomed over our communities with the threat of increased negative impacts on our already overburdened neighborhoods. Despite consistent and

voiced opposition from impacted stakeholders, on March 1, 2018, the Metro Board accepted Caltrans' proposal to favor Alternative 5C, which called for Caltrans to expand the I-710 freeway, ignoring community concerns that it would increase dangerous pollution levels in what is known as a "diesel death zone."

When the United States Environmental Protection Agency ("EPA") expressed concern that the original I-710 South Project would fail to meet air quality conformity, Metro and Caltrans suspended Alternative 5C's advancement. We were encouraged when Metro came to terms with the fact that Alternative 5C stood in stark contrast to a sustainable and equitable future and initiated the I-710 South Corridor Task Force ("Task Force") as the focal point to advance a vision that centers on equity and sustainability. Over the past two years, our good-faith engagement hinged on Metro's steadfast commitment to equity, as defined by the Corridor communities, and sustainability principles to repair past harm done to communities. As Metro itself admits, "Given the high percentage of BIPOC populations in the Corridor," the issues identified during the planning process "reinforc[ed] racial inequities and demonstrate[d] how structural racism persists in urban communities."¹

CEHAJ has consistently called for change along the I-710, including meeting the community's demands for greater protection of public health for impacted residents and community-centered decision-making with affected communities as co-designers of a plan to help repair past harms. While this Draft CMIP aims "to achieve a multidimensional, multimodal investment strategy to improve regional and local mobility and air quality," the Task Force emphasized the need to promote equity at every step. For this to occur, the process must not only create greater transparency and provide a meaningful seat at the table for "stakeholders who live and work along the LB-ELA Corridor" but also "identify opportunity areas for the Investment Plan's projects and programs to support meaningful improvements, and identify the desired community results (equitable future states of well-being) to which these improvements of the Investment Plan will contribute."² Thus, repairing past harms should remain central to the prioritization process under the Task Force and CLC's Vision, Goals, and Guiding Principles.

Metro has an opportunity to address the racist and harmful legacy of freeway expansions by using Measure R and M investments to directly benefit residents in communities hardest hit by the creation of the I-710. The Draft CMIP is supposed to "elevate and engrain...equity across all goals, objectives, strategies, and actions."³ Meaningful community input and engagement are essential, and we believe that the Task Force's re-engagement of community stakeholders serves as a critical starting point.

¹ LB-ELA Draft Corridor Mobility Investment Plan, p. 4-3.

² LB-ELA Draft Corridor Mobility Investment Plan, p. 2-12.

³ LB-ELA Draft Corridor Mobility Investment Plan, p. xxvi.

The Draft CMIP, however, currently falls short of delivering on equity in several ways.

- First, the Draft CMIP fails to promise communities that no one will be displaced by the implementation of any of the projects it proposes to endorse. CEHAJ has consistently called for Metro to end both residential and small business displacement along the Corridor. In late February, Supervisor Janice Hahn voiced her unambiguous call for Metro to “commit itself to zero residential property takes” and to have as “one of its top priorities ensuring that [its] projects do not result in kicking people out of their homes.”⁴ We applaud Supervisor Hahn for making this commitment a part of her approach to the Draft CMIP and invite the entire Metro Board to join a resolution opposing all displacement. The final CMIP must make an unequivocal statement of zero displacement as an outcome of its investment.
- Second, two weeks before the Draft CMIP was released, Metro announced several material changes to the prioritization of projects, shifting which projects would receive priority funding. This change arbitrarily elevated individual industry-led projects and deprioritized and bundled community-facing projects with the potential to deliver substantial benefits to beleaguered residents.
- Third, the inclusion of Community Programs, while laudable, appears to be the lowest priority in the Draft CMIP when considering the lack of firm commitment to full implementation. We are pleased to see the County of Los Angeles stepping in to offer resource support to Metro to help actualize Community Programs, but we need to see more solid commitments to their full and independent implementation in the CMIP itself. Metro must use the County’s commitment to these programs as an opportunity to redouble its commitment to ensuring the benefits come to fruition and are further co-designed and implemented in partnership with impacted communities.

With these principles in mind, our comments focus on the following: 1) projects must help address air pollution and protect public health; 2) Metro should stay true to its commitment to equity and allow the community to define community benefits; 3) industry special interests should not be allowed to derail an equitable investment plan by artificially elevating pet projects while undermining the time and resources that Metro, the Community Leadership Committee (“CLC”), community-based organizations (“CBOs”) and community stakeholders who have invested in democratizing the CMIP creation and approval process.

⁴ Supervisor Janice Hahn, Letter to LA County Metropolitan Transportation Authority CEO, Stephanie Wiggins, (February 27, 2024); <https://twitter.com/SupJaniceHahn/status/1762635137454600240>.

II. Summary of Comments.

The following section summarizes CEHAJ's positions on several projects presented in the Draft CMIP.

A. Projects CEHAJ Supports in Concept.

- **Freeway, so long as they do not result in displacement or the addition of lanes and adhere to Clean Air Act conformity analysis requirements.**
 - LB-ELA_0028: I-710/Willow Interchange Improvements
 - LB-ELA_0156: Traffic Controls at I-710 Freeway Ramps
 - LB-ELA_0157: I-710 Particulate Matter (PM) Reduction Pilot Project
- **Arterial Roadway, so long as they do not result in displacement or the addition of lanes and adhere to Clean Air Act conformity analysis requirements.**
 - LB-ELA_0057: Atlantic Complete Street Corridor
 - LB-ELA_0058: Florence Complete Street Corridor
 - LB-ELA_0061: Slauson Complete Street Corridor
 - LB-ELA_0062: Long Beach Complete Street Corridor
- **Transit.** We support improving transit service times, rider experience, and bus shelters along key routes in the corridor. We urge staff to consider expanding the availability of bus shelters for residents. CEHAJ plans to work with Metro to improve these programs with robust community outreach and engagement. For these reasons, we support investment in the following projects:
 - LB-ELA_0175: Install Quad Safety Gates at all A Line [Blue Line] Crossings, as long as these projects include community consultation to ensure gates are properly positioned and do not reduce pedestrian access points or create additional barriers to mobility.
 - LB-ELA_0179: Metro Bus Priority Lane Corridor along Line 66 (Olympic Blvd)
- We urge Metro to consider the following projects as part of a transit safety package included on the Initial Investments Lists:
 - LB-ELA_0189: Transit System Cleanliness and Maintenance
 - LB-ELA_0177: Second Elevator to Firestone and Slauson A Line Station
- **Active Transportation.**
 - LB-ELA_0008-Blue Line First Last Mile Plan
 - LB-ELA_0158: Del Amo Pedestrian Gap Closure Project
 - LB-ELA_0170: Huntington Park Safe Routes for Seniors
 - LB-ELA_0201: Pedestrian/Bicycle Enhancements and Safety Features
 - LB-ELA_0208: Salt Lake Avenue Pedestrian Accessibility Project in Cudahy
- **We support the following projects if they include analysis for localized emissions.**
 - LB-ELA_0072: Traffic Signal Coordination Projects
 - LB-ELA_0099: Traffic Signal Synchronization Projects
 - LB-ELA_0112: Signal Coordination/ITS Projects

- LB-ELA_0167: I-710 Arterial Signal Performance Measurement
- LB-ELA_0215: I-710 Arterial Traffic Signal Control Communication Upgrades
- **Community Programs.** The CMIP needs to include critical investments that serve to repair the harmful legacy of racist land use decisions and freeway design that created the inequality that persists today. The community programs offer an opportunity to bring investments directly to communities in the Corridor and start the work of improving conditions for residents and course correcting. CEHAJ fully supports improving these programs and working with Metro to ensure they succeed and are designed and led by Corridor communities.
 - LB-ELA_0135: Housing Stabilization Policies
 - LB-ELA_0187: LB-ELA Corridor “Urban Greening” Initiative
 - LB-ELA_0191: Zero Emission Infrastructure for Autos
 - LB-ELA_0192: Bus Electrification Projects
 - LB-ELA_0194: Homeless Programs
 - LB-ELA_0195: Targeted Hire Programs
 - LB-ELA_0218: Air Quality Monitoring Stations
- **Zero-emissions Transportation and Infrastructure.** CEHAJ continues to support the elimination of diesel trucks from the Corridor with prioritization for direct electrification for freight transportation and continued robust community engagement during the planning and deployment of these strategies and supporting infrastructure. For these reasons, we support investment in the following projects if they commit to using limited public funds to advance only zero emissions solutions.
 - LB-ELA_0023: Clean Truck Infrastructure
 - LB-ELA_0004: Long Beach-East Los Angeles Corridor Clean Truck Program

B. Projects CEHAJ Does Not Support.

- We caution against programs framed as "community benefits" while embedding harmful hyper-surveillance of residents through cameras and other technologies that undermine civil liberties and invade privacy. For these reasons, we do not support:
 - LB-ELA_0075: Video Camera installation
 - LB-ELA_0084: Video Detection Upgrades
- We oppose the prioritization of industry-led projects over community projects. Several projects artificially elevate pet projects while undermining the time and resources that Metro, the CLC, community organizations, and stakeholders have invested to democratize the investment plan.
 - LB-ELA_0151: Freight Rail Study (to the extent it fails to study the breadth of potential impacts on communities)
 - LB-ELA_0217: Freight Rail Electrification Pilot Project, to the extent the project serves only private industries that should fund electrification directly.
- We do not support the inclusion of the following projects in the modal programs:

- LB-ELA_0153: Congestion Pricing
- LB-ELA_0182: Express Lanes Strategic Initiative
- LB-ELA_0043: 710 Commerce/Vernon Hobart Rail Yard Overhead
- LB-ELA_0049: Increased Security at Metro’s Existing and Planned Light Rail Stations
- LB-ELA_0091: I-710/Anaheim Interchange Improvement
- LB-ELA_0093: I-710/Wardow Interchange Improvement

C. Deficiencies in the Draft CMIP that Require Clarification and Disclaimers.

- The CMIP should clarify that community consultation is intended throughout the development of these projects. A similar reference should be made in the Clean Truck Infrastructure [LB-ELA_0023] and Zero Emissions Truck Program [LB-ELA_0004].
- The CMIP needs to articulate the expected implications of individual projects to public health and air quality before being endorsed. Advancing projects without further scrutiny contradicts the Task Force and CLC's Vision, Goals, and Guiding Principles. Metro should provide a better evaluation, even preliminary, of the potentially toxic air impacts of the initial list of proposals, especially if these projects are derivative of prior proposals for the freeway.
- The CMIP must make an unequivocal statement ensuring the implementation of any proposed projects will not lead to the displacement of current residents or small businesses.
- Equity points were improperly given to Freeway and Arterial projects for reasons that do not align with the Corridor communities' demand of the Task Force’s definition of equity.
- The lack of specificity in the CMIP’s treatment of Community Programs raises questions about the plan's commitment to uplifting the community's needs and shows a potential disconnect between the planners and the communities they seek to serve. Additionally, Community Programs should not be used as “mitigation” for potentially harmful projects, and their advancement should not depend on the implementation of potentially harmful projects through “bundling” or mechanisms that would otherwise tie them to projects not serving the community directly.
- Freeway, Arterial, and Transit Projects have not been evaluated to ensure they do not fail for the same reason Alternative 5C failed.
- We urge Metro to prioritize Class VI bike lanes over other options and avoid the unintended consequence of increasing impervious cover in areas already marked by increased flood risks and urban heat island effects.
- Metro lacks a definition of zero emissions that eliminates the harms associated with combustion and nitrogen oxide (NOx) emissions.
- Equity flags should be given to the following projects.
 - LB-ELA_0031: I-710/Alondra Interchange Improvements & Modification of SB I-710 to SR-91 Connectors

- LB-ELA_0034: I-710/Florence Interchange Improvements
- LB-ELA_0037: I-710/I-105 Connector Project Improvements
- LB-ELA_0092: I-710/PCH Interchange Improvement
- LB-ELA_0028: I-710/Willow Interchange Improvements
- Language should be included for the following projects to prioritize pedestrian and bicycle safety and not just facilitate vehicle throughput.
 - LB-ELA_0057: Atlantic Complete Street Corridor
 - LB-ELA_0058: Florence Complete Street Corridor
 - LB-ELA_0061: Slauson Complete Street Corridor
 - LB-ELA_0062: Long Beach Complete Street Corridor
- Request confirmation that the Bus Stop Improvement project will absorb Bus Stop Improvements in the City of Commerce [LB-ELA_0077], Maywood [LB-ELA_0103], and City of Signal Hill [LB-ELA_0118].

III. Prioritize Public Health and Eliminate Projects that May Cause More Harm than Good.

A. Metro has the Opportunity to Course Correct and Address Systematic Harms Through the CMIP.

The Draft CMIP lacks specificity on what communities should expect regarding possible implications on their health, air quality, and climate. The purpose of the two-year process to develop the Draft CMIP was to change a historic pattern of development that continues to fail to prioritize the health and well-being of Corridor residents and communities most impacted. The Draft CMIP does a great job of framing the complex history of the nation’s “diesel death zone” — demonstrating the moral imperative to improve public health and air quality in the Corridor. Yet, there is a dearth of details on what health impacts the public can expect from recommended projects. We acknowledge that many projects are far from being fully developed or environmentally reviewed; however, we are left questioning how the Draft CMIP prioritizes transformative change if it does not meaningfully analyze those impacts in concept to ensure future investment does not continue harming Corridor communities.

We learn almost nothing about how each recommended project will directly impact health and air quality locally and reverse past harms in the region. The Draft CMIP includes an “Evaluation and Prioritization” section that is more than 20 pages long and factsheets for each project and program recommended for initial funding. However, for most of the proposed projects, the possible health and air quality implications are marked as “N/A” in many cases; we are left feeling like our continuous calls for prioritizing community health remain unheard.

B. Current and Future Investment in the Nation’s “Diesel Death Zone” Must, at Minimum, Improve Air Quality.

EPA’s recent changes to the nation’s ambient air quality standards reinforce the need to create more stringent, ambitious, and comprehensive strategies to protect more lives and improve air quality in the Corridor, even in the early stages of project development,. As of early February 2024, the EPA strengthened the Clean Air Act standard for fine particulate matter by lowering the annual air standard for PM2.5 pollution from 12 micrograms per cubic meter to 9 micrograms per cubic meter.⁵ Currently, most, if not all, of the communities in the Corridor live in areas with concentrations of PM2.5 above 10 µg/m³.⁶ CEHAJ and community members have continuously requested that Metro foster local and regional clean air quality by clarifying how proposed recommendations will comprehensively affect the health of those working and living in the Corridor. The environmental justice implications of not addressing pollution-induced health disparities in the region are impossible to ignore. Approximately 73 percent of residents live in an Equity Focus Community area, meaning an estimated 876,000 residents.⁷ It is not enough to say these impacts will be analyzed later while at the same time acknowledging the 710 Task Force was created to address community concerns earlier in the project planning process.

C. Metro Must Provide a More Comprehensive Evaluation of the Toxic Air Impacts of Initial List Proposals.

Metro’s suggested use of health proxies, such as shifting emissions, increased local emissions, bicycle and pedestrian safety, increased vehicle miles traveled, expansion of impervious cover, noise pollution, and physical transportation barriers, are all important to track but need to result in a comprehensive approach to assessing these impacts in each proposal as an evaluation criterion, not just as proxies. Of the twenty-seven criteria used to evaluate health-related project outcomes (see Table A), only four criteria (AQ1, CH1, CON5, CON9) directly advance transparency on the implications to air quality and health. Furthermore, data on these four criteria is extremely limited, if at all available, for the vast majority of the projects and programs recommended for initial investment, with many receiving N/A simply because there is no data currently available (see Table B).

⁵ EPA, “EPA finalizes stronger standards for harmful soot pollution, significantly increasing health and clean air protections for families, workers, and communities,” February 7, 2024, available at <https://www.epa.gov/newsreleases/epa-finalizes-stronger-standards-harmful-soot-pollution-significantly-increasing>.

⁶ LB-ELA Draft Corridor Mobility Investment Plan, p. 3-17.

⁷ LB-ELA Draft Corridor Mobility Investment Plan, p. 3-4.

Table A. Project Health Outcomes and Relevant Criteria




































Project Health Outcomes	Criteria	Criteria Description
	AQ1, EQ-AQ1	Reduce Emissions (NOx, PM2.5)
	CH1, EQ-CH1	Reduce Emissions (Health Effects metrics: Diesel Particulate Matter, PM2.5)
	CH2, EQ-CH2	Reduce exposure at receptors (HVAC/HEPA, near-roadway vegetation)
 	CH3, EQ-CH3	Mode Shift to active transportation, transit
	CH5, EQ-CH5	Bike/Ped Access to parks, recreational areas, or open spaces
 	SF1, EQ-SF1	Protections for Bike / Users (bike class)
 	SF2	Traffic Protections (bike/ped)
	SF4	Includes Safety Features
	SF6	Traffic Calming Features
	EN6, EQ-EN6	Reduce Heat Island Effect; Provide Cooling Features for Users
	OP1, EQ-OP1	Access to jobs
	OP4	Work Force Development
	OP5	Potential Targeted Hire, New Construction Jobs
	OP6, EQ-OP6	Access to Quality of Life amenities (grocery stores, healthcare services, schools)
	OP7, EQ-OP7	Access to open space, recreation and parks, LA river, etc.
 	SA1	Reduces reliance on polluting and energy-intensive modes of travel and goods movement
	SA2	Promotes physical activity and health through active transportation and recreation
	SA3	Improves climate resilience through mitigation of flooding and extreme heat impacts
	SA4	Supports job creation in, and workforce transitions to green technology and infrastructure sectors
	SA5	Improves cargo efficiencies to minimize trip volumes and emissions from goods movement activity
 	CON4	Potential for Traffic Diversion
	CON5	Potential to increase Localized Emissions / Emissions Shifting
 	CON6	Potential for Bike/ped safety impacts
 	CON9	Potential for VMT Increases
	CON11	Potential to increase impervious cover
	CON13	Potential to increase noise pollution
 	CON15	Potential for new barriers/decreased access

Table B. Current Air Quality Evaluation for Projects and Programs Recommended for Initial Investment

Project Type	Project ID	Project Name	AQ1	CH1	CON5	CON9
Active Transportation	LB-ELA_0006	Rail to River Active Transportation Corridor Segment B	NA	NA	NA	NA
Active Transportation	LB-ELA_0008	Blue Line First Last Mile Plan Improvements	NA	NA	NA	NA
Active Transportation	LB-ELA_0017	Regionally significant bike projects from the Metro Active Transportation Plan	NA	NA	NA	NA
Active Transportation	LB-ELA_0111	West Santa Ana Branch Bike & Pedestrian Trail	NA	NA	NA	NA
Active Transportation	LB-ELA_0139	Humphreys Avenue Pedestrian/Bicycle Overcrossing	NA	NA	NA	NA
Active Transportation	LB-ELA_0165	Compton Creek Bike Underpasses	NA	NA	NA	NA
Arterial Roadway	LB-ELA_0010	Shoemaker Bridge/Shoreline Drive	1	0.0	1	0
Arterial Roadway	LB-ELA_0057	Atlantic Complete Street Corridor	NA	NA	NA	0
Arterial Roadway	LB-ELA_0058	Florence Complete Street Corridor	NA	NA	NA	0
Arterial Roadway	LB-ELA_0060	Alondra Complete Street Corridor	NA	NA	NA	0
Arterial Roadway	LB-ELA_0061	Slauson Complete Street Corridor	NA	NA	NA	0
Arterial Roadway	LB-ELA_0062	Long Beach Complete Street Corridor	NA	NA	NA	0
Freeway	LB-ELA_0028	I-710/Willow Interchange Improvements	1	2.0	1	0
Freeway	LB-ELA_0029	I-710/Del Amo Interchange Improvements	1	2.0	1	0
Freeway	LB-ELA_0030	I-710/Long Beach Blvd. Interchange Improvements	1	2.0	1	0
Freeway	LB-ELA_0031	I-710/Alondra Interchange Improvements & Modification of SB I-710 to SR-91 Connectors	1	2.0	1	0
Freeway	LB-ELA_0032	I-710/Imperial Interchange Improvements	1	2.0	1	0
Freeway	LB-ELA_0033	I-710/Firestone Interchange Improvements	1	2.0	1	0
Freeway	LB-ELA_0034	I-710/Florence Interchange Improvements	1	2.0	1	0
Freeway	LB-ELA_0035	I-710 Auxiliary Lanes (Willow to Wardlow)	1	2.0	1	1
Freeway	LB-ELA_0036	I-710 / I-405 Connector Project Improvements	1	2.0	1	0
Freeway	LB-ELA_0037	I-710/I-105 Connector Project Improvements	1	2.0	1	0
Freeway	LB-ELA_0038	I-710 Auxiliary Lanes (Del Amo Boulevard to Long Beach Boulevard)	1	2.0	1	1
Freeway	LB-ELA_0091	I-710/Anaheim Interchange Improvement	NA	NA	NA	0
Freeway	LB-ELA_0092	I-710/PCH Interchange Improvement	1	2.0	1	0
Freeway	LB-ELA_0093	I-710/Wardlow Interchange Improvement	1	2.0	1	0
Freeway	LB-ELA_0156	Traffic Controls at I-710 Freeway Ramps	NA	NA	NA	0
Freeway	LB-ELA_0157	I-710 Particulate Matter (PM) Reduction Pilot Project	NA	NA	NA	NA
Freeway	LB-ELA_0181	Freeway Lids, Caps, and Widened Bridge Decks	NA	NA	NA	0
Goods Movement	LB-ELA_0004	Long Beach-East Los Angeles Corridor Clean Truck Program	NA	NA	NA	0
Goods Movement	LB-ELA_0023	Clean Truck Infrastructure	NA	NA	NA	0
Goods Movement	LB-ELA_0151	Goods Movement Freight Rail Study	NA	NA	NA	NA
Goods Movement	LB-ELA_0217	Freight Rail Electrification Pilot Project	NA	NA	NA	NA
Transit	LB-ELA_0141	Metro Bus Priority Lane Corridor along Line 60 (Long Beach Blvd.)	1	2.0	0	NA
Transit	LB-ELA_0142	Metro Bus Priority Lane Corridor along Line 108 (Slauson)	1	2.0	0	NA
Transit	LB-ELA_0144	Metro Bus Priority Lane Corridor along Line 111 (Florence)	1	2.0	0	NA
Transit	LB-ELA_0146	Metro Bus Priority Lane Corridor along Line 260 (Atlantic Blvd.)	1	2.0	0	NA
Transit	LB-ELA_0168	Compton Transit Management Operations Center Enhancements	NA	NA	NA	NA
Transit	LB-ELA_0175	Install Quad Safety Gates at all A Line [Blue Line] Crossings	NA	NA	NA	NA
Transit	LB-ELA_0203	Bus Stop Improvements	NA	NA	NA	NA

The Draft CMIP ultimately prioritized projects without air impact scores, masking the fact that these projects do indeed have air quality impacts. For example, Goods Movement projects' implications on air quality and health were measured using qualitative criteria AQ2, which

focuses on a project’s potential to facilitate the deployment of zero-emission vehicles and equipment. Most of the Goods Movements projects, including those in the Modal Programs, received scores of N/A for criteria used to evaluate health-related project outcomes because they lack sufficient information or methodologies to provide any insight on how they might lead to increased levels of diesel particulate matter, nitrogen oxides, fine particulate matter, localized emissions or emission shifting, and increases in vehicle miles traveled (i.e., the Draft CMIP cannot calculate impacts for criteria AQ1, CH1, CON5, and CON9).⁸ According to staff presentations, this N/A score means there might be an emissions increase, but Metro is currently unable to calculate or estimate the level of impact. The lack of comprehensive scoring criteria to account for health means that there are projects Metro may fund without complete or even conceptual information on the potential harm they will cause to our communities.

For similar reasons, the data on Freeway projects is not entirely trustworthy, as the methodology and calculations are also very limited. Of the 17 freeway projects recommended for initial investment, 13 received “Low Concern,” and four received “N/A” for their potential to increase emissions. When we consider their potential to increase vehicle miles traveled, 14 freeway projects received a “No Impact” score, two projects scored “Low Concern,” and one “N/A.” It is highly doubtful that no freeway project, including interchange projects, should not have received a score higher than 1 (Low Concern) for emissions increases (CON5) when historical data tell us that freeway traffic, particularly along the 710, is a large contributor to the region’s air pollution woes.⁹ The Draft CMIP evaluations are highly untrustworthy and defy common sense. For example, it is unclear why project I-710/Anaheim Interchange Improvement [LB-ELA_0091], a known traffic area for freight transportation, received N/A for emissions increase. Similarly, arterial projects lack sufficient information to determine whether the methodologies are accurate. It is equally unlikely that every arterial project recommended for initial investment should have received either an N/A or a 1.

D. The Lives of Workers and Residents in the Corridor Should be Prioritized, and Projects Likely to Cause Public Health Harm Should be Omitted.

Projects with the potential to create emissions and pollution in Corridor communities have no place in the CMIP. We strongly recommend Metro prioritize a thorough analysis of health implications before further investing in specific projects and programs. A viable solution for projects with no readily available data would be to qualitatively analyze health impacts based on what we currently know about freeway-related emissions instead of simply assigning N/A to projects generally known or expected to have implications. It is entirely possible that Metro does

⁸ Appendix 6-A Rubrics for Benefit and Concern Criteria.

⁹ South Coast Air Quality Management District, Final 2022 Air Quality Management Plan, p.2-32 through 2-34; available at: <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>.

not have sufficient data for all projects across all criteria. The lack of data justifies conducting further study and analysis to vet specific projects instead of the current method of advancing projects with “unknown or not applicable” health implications. Metro should more clearly identify which projects stem from past proposals related to the flawed and abandoned Environmental Impact Report (EIR) for Alternative 5C. In the absence of data for recommended projects, it could be helpful for Metro to include previous estimates and analyses on health implications for similar projects as examples of what communities could expect. Metro will be more transparent and help build trust if the CMIP acknowledges the potential to harm and provides any available estimates. Advancing projects that may cause harm to public health without a thorough study proving otherwise will only erode community trust in Metro and potentially derail the progress made during the past two years. Furthermore, given the limited funding pool, advancing projects unvetted for health impacts, even at a preliminary stage, means that other more health-protective projects may be excluded from this plan.

IV. Metro Should Prioritize Community Benefits.

The Draft CMIP represents a crucial opportunity to address long-standing inequities in transportation planning, particularly in communities of color disproportionately affected in the Corridor. While the Draft CMIP outlines various investments and improvements, there is a glaring lack of emphasis on community benefits, which should be a top priority. The Draft CMIP identified 15 Community Programs as priorities for Metro. We urge Metro not to use any of these Community Programs as forms of mitigation for potentially harmful projects in a “bundled” model. The advancement of Community Programs needs to be independent of the implementation outcomes of potentially harmful projects.

Community benefits must include proactive measures that deliver tangible outcomes that directly address the harm caused by past infrastructure projects. Describing the reduction of air pollution as a community “benefit” does a disservice to efforts to meaningfully rectify environmental injustices. Clean air is not a luxury or an added bonus for communities; it is a fundamental right and a vital necessity for health and well-being. Yet, far too many communities, particularly those burdened by pollution from industrial and transportation sources, bear the brunt of poor air quality. In these areas, respiratory illnesses and other health complications run rampant and highlight the immediate need to reduce pollution levels. Far too often, communities in the Corridor have been sidelined — their voices drowned out by decision-makers who do not understand or value their concerns. Community benefits programs must be co-designed by the affected communities themselves.

While initial funds are allocated for Community Programs, the Draft CMIP fails to provide detailed plans or descriptions for their implementation, which raises significant concerns about the feasibility and effectiveness of the proposed Community Programs. The absence of detailed

plans and descriptions for Community Programs is concerning for several reasons. Firstly, it deprioritizes these essential programs in the planning and implementation process. Without clear plans in place, there is a risk that the allocated funds may not be used effectively or that the intended goals of the programs may not be achieved. The lack of specificity in the Draft CMIP's treatment of Community Programs raises questions about the plan's commitment to uplifting the needs of the community and shows a potential disconnect between the planners and the communities they seek to serve. In order to address these concerns, we propose that Metro revise the Draft CMIP to include a more refined description of Community Programs with concrete strategies for continued implementation and funding, especially since Metro only provided details for "Community Programs" until early this year. These plans should be developed in consultation with community members to ensure they are responsive to community needs and priorities. The recent motion introduced by Supervisor Janice Hahn and unanimously passed by the Los Angeles County Board of Supervisors offers Metro additional support to ensure the implementation of these programs becomes feasible.¹⁰ We urge Metro to incorporate more concrete strategies, utilizing the County as a resource, to fully implement Community Programs.

Moreover, Metro's stated commitment to equity and multimodal transportation is not fully reflected in the allocation of resources within the Draft CMIP. A mere nine percent of initial investments are allocated to Community Programs. In contrast, a significant portion of funding is directed towards further developing "modal programs," such as freeway, transit, and goods movement infrastructure. This disproportionate allocation fails to prioritize more holistic and comprehensive initiatives directly supported by the affected communities and risks neglecting the root causes of transportation challenges. The imbalance not only undermines Metro's equity and sustainability goals but also risks deepening existing disparities and marginalizing the voices of communities most impacted by transportation projects. This requires a reevaluation of funding priorities within the CMIP to reflect the importance of community-led initiatives in achieving equitable and resilient transportation infrastructure. Ultimately, investing in community benefits is not just about meeting regulatory requirements or appeasing stakeholders; it is about recognizing the intrinsic value of community well-being and empowerment.

The lack of funding commitment could result in Community Programs being underfunded or abandoned altogether, further undermining the Draft CMIP's positive impact in the Corridor. It is imperative to ensure that Community Programs receive not only initial funding but also ongoing support for successful implementation. While the Draft CMIP includes initial funding for Community Programs, there is no discussion of how these programs will be sustained in the long term or any discussion of potential allocation from the \$248 million to further "modal programs." It is essential to ensure that Community Programs are not just funded for planning without a commitment to realize them. The Draft CMIP's funding allocation raises concerns about its

¹⁰ Motion by Supervisor Janice Hahn and Hilda L. Solis, March 19, 2024, available at <https://file.lacounty.gov/SDSInter/bos/supdocs/8ce66ebe-50be-4858-a810-afe1e8608900.pdf>.

commitment to community benefits and leaves Community Programs vulnerable to future underfunding, further undermining the plan's long-term impact in the Corridor.

A. Greenspace has Positive Health Outcomes.

There is a critical need to prioritize greenspace commitments in the CMIP, particularly for low-income communities of color in the Corridor. By focusing on community-supported programs and ensuring better greenspace commitments, the CMIP can directly benefit these marginalized communities. Greenspaces offer a wide range of benefits that complement and enhance the effectiveness of other transportation modes, making them essential components of any comprehensive investment plan. They play a vital role in improving air quality, absorbing pollutants, and releasing oxygen, which is especially beneficial for these communities burdened by pollution from industrial and transportation sources. Additionally, greenspaces provide valuable opportunities for active transportation, such as walking and cycling, encouraging sustainable modes of transportation and reducing congestion and greenhouse gas emissions. Furthermore, green spaces can help mitigate the urban heat island effect, reducing temperatures in urban areas. This is crucial as temperatures rise due to climate change, contributing to the creation of more resilient and adaptable communities in the Corridor. It is important to note that greenspace and increased greenery should be consulted with local Indigenous peoples, tribes, and organizations to honor and restore local plant life. We strongly favor a commitment to greenspace improvements as part of the CMIP.

The LB-ELA Corridor “Urban Greening” Initiative [LB-ELA_0187] offers the promise of delivering much needed greenspace to the region. We encourage Metro to prioritize areas right outside of schools for greenspace improvements, including the development of new parks and the upgrade of existing ones. A few non-exhaustive examples of areas where improvements can be targeted include the following: Washington Boulevard between Atlantic and Indiana Street; park areas between Darwell Avenue in Bell Gardens and Ira Street in Lynwood; areas on California Street between Tweedy and Southern in Southgate; Firestone Boulevard between Otis and California. The listed examples were all identified by Corridor residents, members of CEHAJ organizations, as places where existing park space could be improved or expanded. Residents have also voiced a desire for additional space allocated to community gardening to safely grow edible vegetation. We strongly encourage Metro to further consult with residents in deploying these strategies and look forward to participating in future discussions that include members of impacted communities.

B. Housing and Homelessness.

California is in the midst of an unprecedented housing crisis. The cost of housing is skyrocketing with a growing number of households, especially in already under-resourced communities like many in the Corridor, experiencing severe rent burdens and paying more than half of their

income just to stay housed.¹¹ Developing stronger housing protections for low-income renters and homeowners in the Corridor gets at the heart of the investment plan's equity principles by serving to repair the legacy of harm freeways have caused. Anti-displacement housing protections can also serve climate and air pollution goals by avoiding the pressures that force residents to seek more affordable housing options elsewhere and requiring them to commute longer distances to access jobs and resources, thus increasing vehicle miles traveled and harmful emissions.

We strongly believe Metro and the County can play a role in stabilizing housing by working with residents to develop programs that prevent unnecessary evictions, curb unlawful tenant harassment, ease gentrification pressures, and preserve existing affordable units while also spurring the development of sustainable, deeply affordable units that meet current environmental review and protections. To that end, we support the inclusion of the Housing Stabilization/ Land Use [LB-ELA_0135] in the Community Programs and hope to work with Metro and the County to further develop these programs and ensure maximum protection and benefits flow to Corridor residents. We believe there is a strong path forward for these programs through robust community engagement and consultation with tenant rights advocates, community land trusts, and mission-driven non-profit affordable housing experts. We also believe there is a strong benefit to developing new affordable housing options, especially along transit-rich areas. However, we remain skeptical of transit-oriented development initiatives that lack the necessary guardrails to ensure they do not lead to gentrification and other displacement pressures on existing Corridor residents. We, therefore, also urge Metro to consult with mission-driven affordable housing providers and tenant advocates in designing Transit Oriented Development initiatives [LB-ELA_0193].

Additionally, we believe homelessness support initiatives offer an opportunity to bolster local efforts to generate permanent housing options and services for the unhoused. Connecting unhoused riders of Metro to permanent housing and services, like those mentioned under Homelessness Programs [LB-ELA_0194], is a laudable goal. We urge Metro to consult with local CBOs serving the unhoused in developing these programs and caution against having these programs devolve into policing mechanisms that fail to address the root causes of homelessness.

C. Economic Stabilization and Local Hire.

CEHAJ is committed to supporting community programs that directly enhance and support economic stabilization, as well as empower residents through local hire commitments, job training, apprenticeships, and workforce development opportunities – including educational

¹¹ Jenesse Miller, *Even before the pandemic, struggling L.A. renters cut back on food, clothes and transportation*, USC Sol Price Center for Social Innovation, (December 15, 2020), <https://today.usc.edu/los-angeles-rent-burdened-households-basic-needs-usc-research/>.

opportunities for non-English speakers. These programs can aim to build sustainable, long-term, high-paying jobs that will ensure residents can stay in their communities and benefit directly from investments made to improve them.

We appreciate the inclusion of Community Programs that prioritize a more comprehensive approach to improving the economic well-being of Corridor residents harmed by the racist legacy of the I-710 development. We are pleased to see projects like the Economic Stabilization Policies [LB-ELA_0186] having the potential to achieve some of the equity goals aimed at correcting past harm and helping to uplift impacted communities. These programs may also be used to help stabilize and support culturally significant small businesses that have become the lifeblood of these communities for generations and will help strengthen community resilience and stave off displacement. Additionally, Targeted and Local Hire Commitments [LB-ELA_0195] have the potential to further strengthen communities and ensure that investments flowing to the Corridor directly benefit impacted residents. We strongly encourage the full implementation of these programs and suggest that local hire and training opportunities be a priority to the extent that infrastructure build-out and maintenance for zero emissions charging is also being funded and sited in impacted communities.

It's important to note that these programs are essential to correcting past harms. They should stand alone as independent projects that merit initial investment and ongoing support to ensure their implementation, not just in the planning phase. Moreover, they should not be bundled or made contingent on funding for projects that will not directly serve communities or run the risk of adding environmental and air pollution burdens, as this would undermine the equity principles developed through this process.

D. Air Quality Monitoring and Filtration.

Health-promoting programs, such as the LB-ELA Corridor Community Health Benefit Program [LB-ELA_0133], have the potential to bring about significant, equitable change in communities that are most affected by freeways, provided they are implemented correctly, co-designed with community, and with community input. We support Metro in including these programs as part of the Community Programs package and encourage their further development to maximize their effectiveness during the implementation phase. We are also encouraged by the County Board of Supervisors' recent commitment to supporting these programs by linking support from County departments with the technical expertise in developing health promotion, education, screening, and related services.

We suggest that Metro consider expanding support for households affected by freight pollution and offering assistance for whole-home retrofit programs. This could include improving weatherization and abating toxic substances such as lead, mold, and asbestos. It could be done in partnership with other programs and departments to improve indoor air quality, promote greater

energy efficiency, and prepare homes to transition to all-electric zero-emissions appliances for heating and cooling, such as heat pumps, to enhance climate resilience.

However, it's important to note that investments in air quality improvements cannot serve as mitigation for other harmful projects being proposed. Instead, they must aim to repair historical and ongoing harm from existing transportation infrastructure and not serve as a justification to usher in a new set of air quality problems.

We urge Metro to expand the services offered through this program, such as air filtration and monitoring systems, to help improve indoor air quality for homes, libraries, and community centers, in addition to schools in neighborhoods impacted most by freight traffic, noise, and other toxic air pollution in the Corridor. We also suggest that Metro explore using this program to develop climate and air pollution and climate resilience centers with air filtration, temperature regulation, and proper sealing for use during emergencies, such as days when the South Coast Air Quality Management District (SCAQMD) declares extremely unhealthy air for the region, and implement a text message alert system that notifies the public of high air pollution days (similar to the air pollution alerts implemented by Long Beach Alliance for Children with Asthma (LBACA)).

Similarly, we support the expansion of Air Monitoring Stations [LB-ELA_0218] for the Corridor but urge Metro to expand these stations beyond the four currently being proposed. In addition to consultations with SCAQMD, Metro should confer with CBOs and residents familiar with the areas of highest concern to incorporate a broader network of monitoring stations that will help document progress in reducing emissions through the various initiatives funded by the CMIP.

E. Zero Emissions and Transportation Electrification.

Communities have advocated for zero-emission solutions along the I-710 for many years. CEHAJ has held this as a priority since the onset, and we continue to urge Metro to prioritize zero-emission solutions to protect the lives of our communities. We support the inclusion of Zero Emission Infrastructure for Autos [LB-ELA_0191] as long as Metro confirms that community members and organizations will be partners alongside local jurisdictions, public agencies, and private partners. While the project's factsheet qualifies the partner list as nonexclusive, community groups are not referenced as partners.¹² If auto charging infrastructure is considered a "Community Program," community groups should be required to be present at the table. We suggest including organizations and active residents from the Southeast communities and Long Beach, including members of CEHAJ. We also support Bus Electrification Projects [LB-ELA_0192] in concept. Similar to our argument for [LB-ELA_0191], community members and organizations must be meaningful partners in the project's development if this is considered a

¹² LB-ELA Draft Corridor Mobility Investment Plan, p. 8-46.

Community Program. Currently, the project factsheet lists NA for any potential partners.¹³ For a more detailed description of our stance and suggestions for zero-emission strategies, see Section VIII.

F. Projects that Increase Policing and Surveillance Should not be Prioritized.

Governments and law enforcement have a long history of advocating for increased surveillance, often justifying the resulting loss of privacy in the name of security, or in this case, alleviating congestion for the goods movement and, as Metro’s metrics suggest, under the guise of ‘Personal Safety.’¹⁴ Arguing that additional surveillance is a community and safety benefit is not only atrocious but has proven to be disingenuous, harmful, and biased. Increasing surveillance policies and technology not only pose threats to civil rights and liberties, disproportionately affecting communities of color, non-English speakers, and low-income communities but also contribute to broader distrust and skepticism of law enforcement. Investing in projects that expand police and surveillance can result in undesirable consequences and unnecessary risks.

a. Camera Surveillance is Unreliable and Harmful to Communities.

The Draft CMIP includes several projects involving Close Circuit Television Cameras (CCTV), security cameras, and “video camera installations,” which are scored with some safety benefits per Metro’s evaluation metrics.¹⁵ However, video surveillance can be ineffective in deterring crime or reducing accidents, often leading to fear and distrust of public agencies and law enforcement.¹⁶ These surveillance patterns can reflect existing societal biases, resulting in misinformed decisions around arrest and detainment that disproportionately impact communities of color. Additionally, video surveillance can be technologically flawed and vulnerable to hacking or data theft. There is also a risk of data being centralized for more extensive surveillance programs beyond Metro's jurisdiction or being sold to government agencies by private companies.¹⁷ Law enforcement agencies often use the perceived effectiveness of video surveillance to justify securing larger budgets, resulting in funds that are catered to surveillance technologies at the expense of localized community needs. Based on this knowledge, we urge Metro to provide additional information on the ownership of CCTVs, the location of stored data,

¹³ LB-ELA Draft Corridor Mobility Investment Plan, p. 8-47.

¹⁴ LB-ELA Draft Corridor Mobility Investment Plan, p. 6-5 and 6-6.

¹⁵ Id.

¹⁶ Vania Ceccato et al., *Crime and Fear in Public Places: Towards Safe, Inclusive and Sustainable Cities*, p. 40, Routledge (2020), available at https://www.researchgate.net/publication/342987504_Crime_and_Fear_in_Public_Places_Towards_Safe_Inclusive_and_Sustainable_Cities.

¹⁷ Kevin Collier, *U.S. government buys data on Americans with little oversight*, report finds, NBC News (June 2023), available at <https://www.nbcnews.com/tech/security/us-government-buys-data-americans-little-oversight-report-finds-rcna89035>.

access policies, the definition of “security purposes,” and the intention of “video camera installations.”¹⁸

b. Excessive Policing and Surveillance have Negative Health Impacts on Communities.

Research indicates that excessive policing and surveillance are correlated to adverse health outcomes and health inequities.¹⁹ Surveillance of communities, regardless of direct or indirect contact with law enforcement, leads to significant mental and physical health disparities compared to affluent communities.²⁰ Hypervigilance, high blood pressure, anxiety, and PTSD are common in Black and Brown neighborhoods that have historically been targeted by law enforcement agencies, and the increase in police and surveillance could potentially worsen communities’ mental and physical health.²¹ Metro's evaluation of projects with increased policing and surveillance fails to consider equity and health concerns, instead focusing on benefits such as job creation, congestion reduction, and improved goods movement reliability.²² Metro should not prioritize economic well-being at the expense of community health. Instead of relying on reactive surveillance policies, Metro should consider implementing preventative structural changes by redirecting funds to community-centered programs and equitable policies, such as those outlined in the CMIP's Community Programs.²³

c. Prioritize Funding for Community Programs Over Surveillance Technologies.

Excessive policing and surveillance create an environment of fear and suspicion that is incompatible with democratic values and principles. Prioritizing funding back into the community through infrastructure, maintenance and accessibility improvements will help eliminate the need for additional surveillance. Currently, the law has not kept pace with surveillance technological advancements such as smart technology or Artificial Intelligence

¹⁸ *Long Beach-East Los Angeles: Corridor Mobility Investment Plan*, p. 5-8, 8-71&72, Metro (Jan 2024), available at <https://www.metro.net/projects/lb-ela-corridor-plan/>.

¹⁹ Michael Esposito, Savannah Larimore, and Hedwig Lee, *Aggressive Policing, Health, And Health Equity*, Health Affairs (April 2021), available at <https://www.healthaffairs.org/doi/10.1377/hpb20210412.997570/>.

²⁰ *Id.*

²¹ Nichole A. Smith et al., *Keeping Your Guard Up: Hypervigilance Among Urban Residents Affected by Community And Police Violence*, Health Affairs (Oct 2019).

²² Draft Combined Evaluation Results, *Active Transportation Concerns*, Metro (Oct 2023).

²³ LB-ELA Draft Corridor Mobility Investment Plan, p. 5-8.

(AI),²⁴ which some CMIP programs propose to use to alleviate traffic.²⁵ How do we know communities' privacy will be protected? How do we know communities' daily activities and behavior will not be sold to private companies or other law enforcement agencies? But most importantly, how will Metro ensure that our existing societal biases are not guiding an evolving surveillance technology without any safeguards for historically marginalized communities? We demand Metro develop an agency-wide policy prioritizing investments in Community Programs over additional police and surveillance. Furthermore, we oppose the reliance on AI as an industry cost-cutting strategy that would replace community jobs.²⁶

V. Freeway and Arterial Projects Should Serve Impacted Communities and Deliver Direct Benefits.

A. Freeway Projects.

CEHAJ has repeatedly stated through this process that freeway projects should not receive equity metric points. Because they have, the freeway projects prioritized for investment are misleadingly depicted as promoting equity in a way not intended by the guiding equity principles established through the Task Force process. During the Task Force process, equity was defined as “a commitment to (1) strive to **rectify past harms**; (2) provide fair and just access to opportunities; and (3) **eliminate disparities in project processes, outcomes, and community results.**”²⁷ Accordingly, equity criteria were designed to evaluate whether projects would likely provide benefits related to existing Corridor disparities and, if so, whether those benefits would be directed to geographies and populations of highest need. As expected, the majority of the freeway projects received Concern scores related to their potential to contribute toward displacement and impact the safety of bicyclists and pedestrians. However, Metro gave most freeway projects equity credit simply for moving goods through impacted communities more efficiently. For example, I-710/Anaheim Interchange Improvement [LB-ELA_0091] received equity points for basic functions of improved transportation.²⁸ These are not the “benefits” the community called

²⁴ Queenie Wong, *California wants to reduce traffic. The Newsom administration thinks AI can help*, Los Angeles Times (Jan 2024), available at <https://www.latimes.com/california/story/2024-01-08/california-traffic-roads-safer-generative-ai-help>.

²⁵ LB-ELA Draft Corridor Mobility Investment Plan, p. 5-7.

²⁶ Jeff Farrah, *California Gov. Newsom is right. Truck drivers and autonomous trucks can thrive together—not just coexist*, Fortune (Oct 2023), available at <https://fortune.com/2023/10/26/california-gov-newsom-truck-drivers-autonomous-trucks-thrive-together-supply-chains-tech-politics-jeff-farrah/>.

²⁷ LB-ELA Draft Corridor Mobility Investment Plan, p. xxvi.

²⁸ This was taken from the Draft Combined Evaluation Results provided on the 710 Task Force Drop Box EQ-MB2 (Increases roadway speeds (or reduces travel times) for people and goods movement; EQ-MB3: (Reduces hours of delay for persons and goods); EQ-OP1 (Increases the

for because they do not directly undo the past prioritization of “industry over the health and livelihoods of Corridor residents.”²⁹ The Corridor communities want improved health and air quality, not more vehicle trips through their neighborhoods.³⁰ Increased access facilitated by new general-purpose travel lanes to create greater capacity for growing traffic and population was not the specific equity outcome that the community asked for with respect to freeway infrastructure projects. This benefits everyone who utilizes freeways in the Corridor.

From the beginning of this process, the community prioritized limiting displacement and health concerns from freeway development.³¹ The community was more concerned with “bear[ing] the project’s adverse impacts” that are more localized in nature and would quash any general benefits the projects offered as a whole.³² In other words, equity points should only be given to a project if it improves the unique burdens that communities living within the project’s impacted area have to bear, including displacement and safety concerns caused by freeway development. Presenting these freeway projects as equitable without accounting for localized equity priorities related to health and safety is misleading and presents these projects as more beneficial than they deserve. Furthermore, Metro has not explained how “bundl[ing] all the proposed Investment Plan freeway infrastructure projects into one set of candidate projects for an Alternatives Analysis/Prioritization study” will not set it along a path mirroring the failed Alternative 5C project.³³ Metro must ensure that all proposed freeway projects adhere to Clean Air Act conformity analysis requirements.

That said, CEHAJ appreciates that these bundled projects come with equity flags identifying the displacement concerns generally for projects I-710/Alondra Interchange Improvements & Modification of SB I-710 to SR-91 Connectors [LB-ELA_0031], I-710/Florence Interchange Improvements [LB-ELA_0034], I-710/I-105 Connector Project Improvements [LB-ELA_0037], and I-710/PCH Interchange Improvement [LB-ELA_0092]. CEHAJ supports projects I-710/Willow Interchange Improvements [LB-ELA_0028], Traffic Controls at I-710 Freeway Ramps [LB-ELA_0156], and I-710 Particulate Matter (PM) Reduction Pilot Project [LB-ELA_0157]. However, the project descriptions are so vague it is unclear whether these projects will be accomplished through the addition of lanes, no matter how modest. Therefore, equity

average number of jobs accessible within a 30-minute time period by transit or a 45-minute time period by automobile); EQ-OP8 (Provides new job opportunities for underemployed and low-income individuals in the workforce).

²⁹ LB-ELA Draft Corridor Mobility Investment Plan, p. 4-9.

³⁰ This would be represented by receiving equity points in EQ-AQ1, EQ-AQ2, EQ-CH1, EQ-CH2, EQ-CH3, EQ-EN3, EQ-EN6. Only Projects LB-ELA_0031, LB-ELA_0034, LB-ELA_0037, and LB-ELA_0092 received equity points for EQ-AQ1, EQ-AQ2, EQ-CH1 or EQ-CH3.

³¹ LB-ELA Draft Corridor Mobility Investment Plan, p. 4-2.

³² LB-ELA Draft Corridor Mobility Investment Plan, p. 4-9.

³³ LB-ELA Draft Corridor Mobility Investment Plan, p. 8-28.

flags should also be added to these three projects for displacement concerns. CEHAJ is against investing in I-710/Anaheim Interchange Improvement [LB-ELA_0091] and I-710/Wardlow Interchange Improvement [LB-ELA_0093] and suggests they receive equity flags for displacement and safety. Projects [LB-ELA_0043], Congestion Pricing [LB-ELA_0153], and Express Lanes Strategic Initiative [LB-ELA_0182] should not be included in the modal program because they threaten displacement as well.

B. Arterial Roadway.

CEHAJ generally supports the arterial roadway projects identified for investment, as long as Metro ensures that all proposed arterial roadway projects adhere to Clean Air Act conformity analysis requirements. Appropriately, these projects have equity flags and corresponding Implementation Requirements/Guidance narratives. The Implementation Requirements/Guidance should also include the following details so that pedestrian and bicycle safety concerns are also prioritized in future design and analyses:

- Atlantic Complete Street Corridor [LB-ELA_0057], Florence Complete Street Corridor [LB-ELA_0058], Slauson Complete Street Corridor [LB-ELA_0061], and Long Beach Complete Street Corridor [LB-ELA_0062], which are projects meant to complete the street corridor, must prioritize pedestrian and bicycle safety, and not just facilitate vehicle throughput. CEHAJ emphasizes the importance of including native landscaping as well as allergy-friendly greenery. Continued maintenance must be a part of the project as well because overgrowth creates blind spots and obstacles on the sidewalks, which poses a safety hazard for pedestrians and commuters.
- Projects that anticipate bicycle lanes should only promote Class IV bicycle lanes.
- Avoid negatively impacting pedestrian and bicycle safety and prevent the expansion of impervious surfaces that could increase stormwater runoff, environmental heat gain, or worsen water quality—all of which negatively impact ecosystems and human health.

Additionally, community members are concerned that some areas, including East Los Angeles and Commerce, do not have projects, although they have identified and raised multiple areas of concern and proposed possible solutions.

CEHAJ does not support the inclusion of any surveillance projects in the Arterial Roadways Modal Program. As described in the Draft CMIP, the following projects do not explain how they serve the local communities and increase safety. Accordingly, the following projects should not be included in the Arterial Roads Modal Programs:

- Video Camera Installation [LB-ELA_0075]
- Video Detection Upgrades [LB-ELA_0084]

The following traffic signalization projects identified for the Arterial Roadways Modal Program should also include equity flags related to their potential concerns for increased localized emissions. Should those projects move forward during the project planning and approval phase, localized air pollution (such as particulate matter) must be a part of the analyses:

- Traffic Signal Coordination Projects [LB-ELA_0072]
- Traffic Signal Synchronization Projects [LB-ELA_0099]
- Signal Coordination/ITS Projects [LB-ELA_0112]
- I-710 Arterial Signal Performance Measurement [LB-ELA_0167]
- I-710 Arterial Traffic Signal Control Communication Upgrades [LB-ELA_0215]

VI. Transit Projects.

The Draft CMIP cites Community Alternative 7 as a source for many programs listed in the initial investment plan and the modal programs.³⁴ With a framework centered on protecting community health and the environment while achieving traffic safety, enhancing goods movement, and reducing congestion, Community Alternative 7 proposed a comprehensive public transit plan for the Corridor that would usher in an aggressive strategy to improve public transportation via rail and bus for residents.³⁵ Community Alternative 7 also called into question the wisdom of assuming only the maximization of the then “Blue Line” (A Line) and increasing existing bus service over building additional light rail capacity and expanding routes and service to the surrounding communities.³⁶

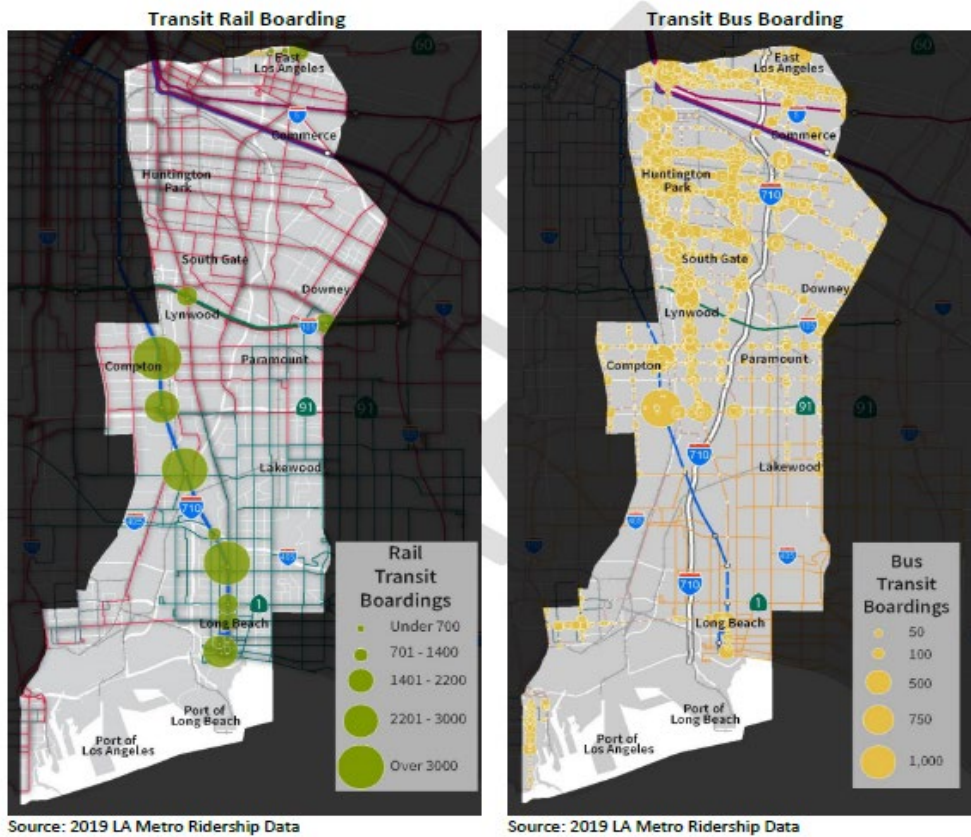
With this renewed opportunity to invest in the Corridor, we call on Metro to prioritize safe, reliable, extensive, and zero-emissions public transit. Our call for a comprehensive and aggressive public transit strategy remains. The Draft CMIP has an opportunity to refocus on Metro’s core commitments to residents of LA County and, in doing so, help alleviate air pollution burdens by reducing traffic and promoting equity by enhancing opportunities for resident mobility. It is well established that the population in the Corridor are public transit users and that the general area includes some of the most heavily utilized rail and bus lines in the entire Los Angeles Metro Area (see Figure A). This is evident in Metro’s pre-pandemic ridership data, showing large clusters of high-volume bus and rail transit boardings occurring throughout the Corridor, especially in under-resourced communities.

³⁴ LB-ELA Draft Corridor Mobility Investment Plan, p. 5-2.

³⁵ Community Alternative 7, p. 3.

³⁶ *Id.*, p. 4.

Figure A. Transit Use



This is why an investment plan put forth by the region’s public transit authority should prioritize accessible and comprehensive public transit for the region’s residents over projects serving only private industry interests. CEHAJ has consistently supported the removal of trucks, locomotives, and other freight equipment with health-harming tailpipe emissions. CEHAJ members, for example, have pushed for programs to electrify operations at ports and railyards. However, to the extent Metro’s limited funds can support zero-emissions infrastructure, the CMIP should focus on projects that deliver the most direct investment in impacted communities.

In general, we support transit projects that will improve conditions for riders of public transit along bus routes. This includes expanding quality bus stop shelters with ample shade, accurate signage, accessibility, and pedestrian safety, as well as improving route schedules for enhanced reliability and ridership experience. Regarding signage, community members we have spoken to have stressed the importance of accurate and clear signage, with electronic message boards at more heavily used stops showing headways for buses. It’s worth noting that none of the current

transit projects include this vital element. These improvements should be planned and co-designed with input from impacted communities.

As mentioned in other parts of our comments, we are opposed to projects that pose the danger of increasing surveillance, policing, and tracking of residents, such as cameras and other recording devices, as well as the use of artificial intelligence and algorithms that rely on data tracking that could invade the privacy rights of unknowing riders (for more see Section IV). While riders' safety is and should be a top priority, Metro's efforts are better spent ensuring that bus stops and transit stations are clean, have adequate lighting, are generally free of exposure to toxic hazards, and protect pedestrians and bicyclists from truck and car traffic.

We also urge Metro to prioritize expanding bus routes and services to the Corridor through robust community consultation and vetting to ensure more significant transit equity. Maximizing ridership in impacted communities will serve all elements of the equity guiding principle (procedural, distributive, restorative, and structural) and the sustainability guiding principle to enhance community and environmental well-being. Residents of Corridor communities are highly transit-dependent compared to other county regions. Expanding bus service, especially through electrified zero-emissions fleets, would improve air quality and mobility, increase opportunities by providing greater community access to quality jobs, and enhance residents' quality of life, safety, and health.³⁷ Furthermore, if a goal of the CMIP is to increase ridership and benefit impacted communities in the Corridor, Metro should consider utilizing this funding opportunity to offer fare-free transit to the communities in the Corridor. Fare-free transit will be particularly important during the construction of some of the proposed projects, given that multi-year construction creates barriers and increased traffic throughout the Corridor.

Funding for freeway safety and interchange improvement projects is nearly double what it is for transit when considering estimated investment leveraging for Measure R/M funding and the Measure R/M Funding recommendations the Draft CMIP is making (see Table C). For projects recommended for initial funding, transit receives just six percent of the recommended R/M funding compared to goods movement projects that will receive more than double that amount in initial funding, above active transportation and Community Programs.³⁸

³⁷ LB-ELA Draft Corridor Mobility Investment Plan, p. 8-74.

³⁸ LB-ELA Draft Corridor Mobility Investment Plan, p.7-4.

Table C. Estimated Project Costs and Recommended Programming of Measure R/M Funds

Mode	A. Estimated Investment Leveraging Measure R/M Funding (\$m)	B. Measure R/M Funding Recommendation (\$m)			Estimated Grant Funding Required (\$m) (A – B.3)
		B.1. Projects for Initial Funding	B.2. Modal Programs	B.3. Total (B.1 + B.2)	
Freeway Safety and Interchange Improvements	\$1,100	\$171	\$49	\$220	\$880
Arterial Roadways/Complete Streets	\$940	\$116	\$72	\$188	\$752
Transit	\$625	\$29	\$96	\$125	\$500
Goods Movement	\$320	\$61	\$19	\$80	\$240
Active Transportation/TDM	\$180	\$33	\$57	\$90	\$90
Community Programs	TBD	\$40	\$0	\$40	TBD
Total	\$3,205*	\$449	\$294	\$743	\$2,462*

There is also more opportunity to fix the harm Corridor communities have experienced by prioritizing the acceleration of public transit direct electrification projects to improve air quality and promote greater opportunities for the region— an element that could be more fully developed in the Draft CMIP. We encourage Metro to seek more ways to electrify existing fleets by deploying catenary and battery electric buses and rail.

CEHAJ is generally supportive of efforts to maximize service and access at existing rail lines and bus routes, increase bus service, improve conditions and remove or minimize safety hazards at stations, and enhance bus shelters to provide ample shade, seating, and potentially other amenities like public restrooms and drinking fountains. We are encouraged to see many projects aiming to improve public transit make it into the Draft CMIP and modal programs. However, not all projects are alike, and given the lack of detail, some projects may pose additional concerns and consequences that should raise flags and require further study prior to committing to investing in them. Below is a breakdown of transit projects CEHAJ supports in concept and projects that raise concerns.

A. Improving Transit Service Times and Rider Experience.

Improving transit service and enhancing the rider experience are priorities CEHAJ supports, especially if these efforts directly serve residents in communities most impacted by the I-710. Projects like the Blue Line First/Last Mile Plan Improvements [LB-ELA_0008], although listed

under Active Transportation, offer greater connectivity by extending safer access to Blue Line stations in surrounding communities through enhanced bicycling infrastructure, sidewalks, and access points. This project would likely improve rider experience by offering better options to access rail when necessary while improving passenger safety and reducing risks to pedestrians and bicyclists. For this project, however, we suggest Metro define protected bike lanes as “Class IV” — a more effective way to protect bicyclists and reduce fatalities.

Other projects on the Draft CMIP seemingly offer improved transit service times, but we are concerned that without more details, the projects selected may not deliver improved transit rider experience and instead lead to traffic diversion and congestion onto adjacent residential streets. Projects aimed at creating priority bus lanes, for example, triggered equity flags and signaled high levels of concern without guaranteeing that bus times would improve. These include the Priority Bus Lane Corridor along Line 60 [LB-ELA_0141], Metro Bus Priority Lane Corridor along Line 111 [LB-ELA_0144], Metro Bus Priority Lane Corridor along Line 108 [LB-ELA_0142], and Metro Bus Priority Lane Corridor along Line 260 [LB-ELA_0146]. A priority lane alone may not decrease headways unless coupled with more buses operating on the route, especially during peak hours. While CEHAJ supports build-outs that will improve boarding and accessibility as well as improvements to bus stops, residential members of our organizations have specifically identified improved bus shelters with ample shading as a priority. We hope these specific projects might be further developed to offer greater assurances that service times and rider experiences are improved.

B. Bus Shelter Improvements

We are pleased to see that bus shelter improvements have made it onto the Draft CMIP and fully support the broader approach to improving bus shelters throughout the Corridor, but we urge Metro to increase the target number from 100 to 400 bus shelters as part of this investment strategy. Bus stop shelters are essential to improving bus rider experience and safety throughout the system. A recent report, for example, showed that roughly 75 percent of bus stops in Los Angeles lacked shelter.³⁹ Bus Stop Improvements [LB-ELA_0203] offers the prospect of improving transit ridership by providing additional safety and enhancing the rider experience. We strongly recommend that Metro incorporate ample shading to the CMIP for bus shelters and encourage the inclusion of public restrooms in addition to the other planned amenities. We also request confirmation that the Bus Stop Improvement project will absorb Bus Stop Improvements in the City of Commerce [LB-ELA_0077], Maywood [LB-ELA_0103], and City of Signal Hill [LB-ELA_0118], which were each previously listed separately.

³⁹ Maylin Tu, *More than 75% of Bus Stops in the City of Los Angeles Have no Shelter, What now?*, Los Angeles Public Press (September 26, 2023); <https://lapublicpress.org/2023/09/more-than-75-of-bus-stops-in-the-city-of-los-angeles-have-no-shelter-what-now/>.

C. Transit Safety.

The CMIP Initial Investments should prioritize transit safety over policing and monitoring transit riders. We support efforts to create additional protection for pedestrians accessing train stations and bus stops, such as the project to Install Quad Safety Gates at all A Line [Blue Line] Crossings [LB-ELA_0175], as long as these projects include community consultation to ensure gates are properly positioned and do not reduce pedestrian access points or create additional barriers to mobility. Not on the Initial Investment list are a series of projects that have a high benefit score, offer safety improvements to enhance the rider experience, and offer better protection. We urge Metro to consider these as part of a transit safety package included on the Initial Investments Lists. They include the following:

- **Transit System Cleanliness and Maintenance** [LB-ELA_0189]. Metro should prioritize strengthening its commitment to regular cleaning and maintenance on all transit vehicles and at bus and rail stations, including providing high-efficiency air filters on bus and rail transit vehicles. The COVID-19 pandemic taught us that the most under-resourced communities are also the most vulnerable to airborne illnesses. Improved cleaning also helps mitigate public health concerns like spikes in transmissible diseases.
- Add a **Second Elevator to Firestone and Slauson A Line Stations** [LB-ELA_0177]. Adding more elevator access will improve accessibility for the mobility-impaired, improve opportunities for increased ridership, and limit overcrowding at entry points and platforms.

D. Other Transit Projects Recommended for Initial Investment Require Greater Clarity and Definition.

The Compton Transit Management Operations Center Enhancements [LB-ELA_0168] represents an outlier as it is unclear whether this project is oriented towards the community or management and staff at the Metro organization. The site appears to house offices for the City of Compton and the Los Angeles County Sheriff. This project seems out of step with the goals and objectives of the CMIP and provides little, if any, direct benefit to impacted communities. More specificity about the project may shed light on the intended benefits to the community.

VII. Active Transportation.

Active transportation (AT) has proven to have major health benefits. When AT initiatives are driven by community visioning, they promote trust and address existing inequities, contributing to the long-term success and sustainability of such initiatives.⁴⁰ Unfortunately, the equitable

⁴⁰ Meera Sreedhara, et al., *Stepping Up Active Transportation in Community Health Improvement Plans: Findings From a National Probability Survey of Local Health Departments*, Journal of Physical Activity and Health, (Sept 23, 2019), <https://journals.humankinetics.com/view/journals/jpah/16/9/article-p772.xml?content=fulltext>.

impacts on pedestrians and cyclists are frequently ignored, resulting in an uneven distribution of AT initiatives. This leaves communities with unsafe bike and walking paths, limited green space and shade, and a history of neglecting local knowledge and lived experiences. This oversight becomes evident when funding prioritizes car-centric initiatives.⁴¹ The Metro Board should reevaluate funding policies to prioritize pedestrian and cycling safety, accessibility, climate-resilient features, and alignment with community vision and agency goals.

A. Active Transportation Programs Should Prioritize Community Safety and Mobility.

We welcome AT programs that align with communities' vision and lived experience, given that most communities of color and low-income communities suffer from inadequate or poor AT infrastructure.⁴² Centering communities in the AT planning process provides valuable perspectives and ensures that programs are tailored to community preferences. Communities have long advocated for increased pedestrian safety, including high visibility intersections, flashing signs, traffic calming features, and green and accessible infrastructure. Huntington Park Safe Routes for Seniors and Students [LB-ELA_0170] incorporates features that address deficiencies in pedestrian safety and less on vehicle convenience.⁴³ Pedestrian/Bicycle Enhancements and Safety Features [LB-ELA_0201] includes measures that address green infrastructure, protection barriers, and repositioning of utility boxes for accessibility improvements.⁴⁴ Del Amo Pedestrian Gap Closure Project [LB-ELA_0158] is heavily supported by community members for its improvement of accessibility, mobility, and safety in an area that has constant truck traffic and has historically lacked any safety measures for pedestrians and cyclists. Lastly, Salt Lake Avenue Pedestrian Accessibility Project [LB-ELA_0208] in Cudahy is another initiative that underscores community preferences, focusing on enhancements like expanded sidewalks and the installation of additional ADA-compliant wheelchair ramps.⁴⁵ It is discouraging to see programs with similar initiatives not included in the recommended list for initial investment or only partially funded.⁴⁶ Metro can and should prioritize programs that reflect community input, especially those addressing equity concerns, safety upgrades, and promoting sustainability.

⁴¹ Joe Linton, *Metro Measure M Local Return Funds Go Predominantly To Driving*, Streets Blog LA (1 March 2023), available at <https://la.streetsblog.org/2023/03/01/metro-measure-m-local-return-funds-go-predominantly-to-driving>.

⁴² Riley O'Brien, *Disparities in Active Transportation Safety in the SCAG Region*, UCLA Institute of Transportation Studies (2018), available at <https://escholarship.org/uc/item/3zw829zm>.

⁴³ LB-ELA Draft Corridor Mobility Investment Plan, p.8-66.

⁴⁴ Id.

⁴⁵ *ADA Standards for Accessible Design*, US Dept of Justice and Civil Rights Division, available at <https://www.ada.gov/law-and-regs/design-standards/>.

⁴⁶ LB-ELA Draft Corridor Mobility Investment Plan, p.8-65.

B. Increased Impervious Cover Have Negative Health Impacts.

While AT programs offer many health and equitable benefits, some projects can harm communities. This includes AT programs that risk displacement and increased impervious cover and flood risks, like Randolph Street Bike and Pedestrian Facilities Project [LB-ELA_0128].⁴⁷ Increased impervious cover, such as concrete and asphalt surfaces, negatively impact pedestrian health and the overall urban environment. Impermeable surfaces contribute to urban heat islands and high surface temperatures due to their high heat capacity, thermal conductivity, low reflectance of solar radiation, and reduced evapotranspiration cooling.⁴⁸ As for flood risks, existing impervious surfaces already prevent rainwater from infiltrating the ground⁴⁹ and projects that increase impervious pavements will only worsen storm runoff and flooding.⁵⁰ Impervious surfaces collect soot, rubber particles, and dozens of other pollutants, which can significantly impact environmental and human health and communities' mobility.⁵¹ Additionally, studies have shown a correlation between higher proportions of impervious surfaces in communities of color and low-income communities, a policy gap that Metro can address to reduce the legacy and harm of redlining policies.

C. Active Transportation Programs Should Not Cause Displacement.

For decades, communities have advocated against the displacement of homes and businesses. Despite this, several AT programs have the potential for displacement and demolition.⁵² Metro's evaluation rubric scores displacement of "1" as "Low Impact," meaning that a total of less than three businesses or residences are likely to be displaced.⁵³ AT programs should not result in the displacement of people as AT programs are fundamentally designed to encourage non-motor

⁴⁷ Includes projects LB-ELA_0128 Randolph Street Bike and Pedestrian Facilities Project, LB-ELA_0017 Regionally significant bicycle projects from the Metro Active Transportation Strategic Plan.

⁴⁸ Bill Jesdale et al., *The Racial/Ethnic Distribution of Heat Risk-Related Land Cover in Relation to Residential Segregation*, Environmental Health Perspectives, National Library of Medicine (July 2013), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3701995/>.

⁴⁹ Rong-Gong Lin II, *L.A. staved off disaster this time. But our luck is running out as extreme weather worsens*, Los Angeles Times (Feb 11, 2024), available at <https://www.latimes.com/california/story/2024-02-11/l-a-staved-off-disaster-with-this-storm-extreme-weather-is-testing-our-luck>.

⁵⁰ Lance Frazer, *Paving Paradise: The Peril of Impervious Surface*, Environmental Health Perspectives (July 2005), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257665/>.

⁵¹ Id.

⁵² *LB-ELA Multimodal Corridor Investment Plan: Project and Program Performance Evaluation Methodology*, Metro (Oct 2023),

(<https://www.dropbox.com/scl/fo/tfmcaehnpk36kzja2vne9/h?e=1&preview=LB-ELA+Combined+Evaluation+Rubric+->

[+English.pdf&rlkey=6yw2jw7gitng0omslzn743r82&dl=0](https://www.dropbox.com/scl/fo/tfmcaehnpk36kzja2vne9/h?e=1&preview=LB-ELA+Combined+Evaluation+Rubric+-+English.pdf&rlkey=6yw2jw7gitng0omslzn743r82&dl=0), p. 85-86.

⁵³ Id.

mobility, promote physical activity, and create more sustainable and accessible communities. Also, AT programs take up less space and require less impervious surfaces and resources compared to car-centric infrastructure.⁵⁴

D. Class IV Bike Lanes Should be Prioritized.

Metro promotes AT initiatives as an accessible and more appealing environment for communities but falls short in providing safer amenities for cyclists, such as Class IV Protected Bike Lanes or “Separated Bikeways.”⁵⁵ Class IV bike lanes are exclusively for bicycles and require physical separation between the separated bikeway and vehicular traffic, including inflexible barriers, raised curbs, fences, grade separations, or vegetation buffers.⁵⁶ Currently, the Draft CMIP has zero projects that prioritize Class IV bike lanes, promoting only Classes I-III, which lack any protective barriers and promote “sharing the road” policies with motorized vehicles.⁵⁷ However, Class IV bike lanes not only protect cyclists but are also shown to significantly reduce fatalities for all street users.⁵⁸ Protected bike lanes provide an enhanced level of safety that encourages more people to embrace cycling while creating sustainable urban environments. It is concerning that 31 projects, like West Santa Ana Branch [WSAB] Light Rail Station First-Last Mile Bikeway Safety and Access Project [LB-ELA_0213], which is in the implementation stage, offer only Class II and III bike lanes in an area with high truck traffic.⁵⁹ If Metro is committed to rectifying past harms and fostering a safe environment, then it should develop an organization-wide policy that prioritizes Class IV bike lanes as the golden standard for bicycling programs.

⁵⁴ Thomas Gotschi et al., *Active Transportation for America: The Case for Increased Federal Investment in Bicycling and Walking*, Rails to Trails Conservancy (2008), <https://www.railstotrails.org/resourcehandler.ashx?id=2948>, p. 37-38.

⁵⁵ *Chapter 1000: Bicycle Transportation Design*, Highway Design Manual (July 1, 2020), available at <https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp1000-a11y.pdf/1000>, pg. 1004.

⁵⁶ Michael D. Garber et al., *Have paved trails and protected bike lanes led to more bicycling in Atlanta? A generalized synthetic-control analysis*, National Library of Medicine (April 12, 2022) <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9211442/>.

⁵⁷ LB-ELA Draft Corridor Mobility Investment Plan, p. xxii.

⁵⁸ Wesley E. Marshall et al., *Cycling lanes reduce fatalities for all road users, study shows*, University of Colorado Denver (May 29, 2019) <https://www.sciencedaily.com/releases/2019/05/190529113036.htm>.

⁵⁹ LB-ELA Draft Corridor Mobility Investment Plan, p.8-38.

VIII. Zero-Emissions and Public Safety Strategies Without Displacement, Exposure to Additional Harm, and Co-designed with the Community.

From the start of the LB-ELA Corridor Task Force process, CEHAJ has consistently called on Metro to reaffirm its commitment to only exploring zero-emissions solutions for the Corridor—a commitment this coalition and several other community groups have demanded for decades. In approving the initial \$50 million seed money for a new Clean Trucks Program, the Metro Board gave a clear directive for a program that would no longer entertain half-measures like “near zero” technology but instead commit to using limited public funds to advance only zero emissions solutions. For those reasons, we generally support the proposal to include a Clean Truck Infrastructure Program [LB-ELA_0023] and the Zero-Emissions Truck Program [LB-ELA_0004] in the CMIP.

We use this opportunity, however, to reiterate our request that: 1) community health and wellbeing remain at the center of zero-emission technology deployment in the Corridor by ensuring that funded projects do not result in displacement, do not bring new health and safety risks through the production, storage, transportation, and fueling with hydrogen, and protect against air pollution and health impacts from any construction and operation of zero-emissions infrastructure; 2) investments in zero emissions result in co-benefits such as high road jobs and training for residents, and; 3) limited funds intended for the Corridor support projects aligned with community needs and tailored to provide tangible and measurable benefits to the communities most impacted by freight.

A. Zero-Emissions Infrastructure Planning and Deployment Must Include Robust Community Engagement.

We are pleased that the Draft CMIP incorporates CEHAJ requests for robust community engagement “that centers Corridor residents and stakeholders throughout the development process.”⁶⁰ We strongly believe that placing community health and wellbeing at the center of these investments requires the community to co-design the charging infrastructure and zero emissions truck program that will undoubtedly change the landscape in their communities for decades. The models for the type of engagement required are already available—one need look no further than the successful approach taken in a collaboration between CEHAJ and the Los Angeles Cleantech Incubator.

Through that project, we learned that the expertise and wisdom residents bring regarding the built environment in their neighborhoods is invaluable to this process. We urge Metro to include funding for this level of engagement moving forward as the Zero Emissions Infrastructure and Truck programs are implemented. We further urge Metro to make the commitment to community engagement in both the Zero Emissions Truck and Infrastructure programs unequivocal. For

⁶⁰ LB-ELA Draft Corridor Mobility Investment Plan, p.2-15.

example, the factsheets in the Draft CMIP provide cursory information about each project plan. Some, like the Zero-Emissions Infrastructure for Autos [LB-ELA_0191] listed under Community Programs, cite some potential partners while others do not. We suggest Metro includes clear language stating that organizations and community members of the Corridor will be meaningful partners in developing the proposals. The Draft CMIP should clarify that community consultation is intended throughout the development of these projects. A similar reference should be made in the descriptions of the Clean Truck Infrastructure [LB-ELA_0023] and Zero Emissions Truck Program [LB-ELA_0004].⁶¹

B. Invest in Zero Emissions that Serve Communities First.

Throughout this process, Metro staff have reminded us that funds are limited—a fact not lost on members of CEHAJ as the state faces a steep budget deficit this year. The available funding, however, presents an opportunity to invest in programs that can vastly improve conditions in Corridor communities and repair the harmful legacy that racist redlining practices have left and polluting industries continue to perpetuate. To the extent zero emissions programs are being funded, whether for charging infrastructure or a zero-emission truck program, those projects should maximize the air quality benefits to local communities. That means that if zero-emission trucks are being routed through Corridor neighborhoods, it corresponds with eliminating a combustion alternative that would have continued producing the harmful emissions that residents currently breathe in. Additionally, there should be alternative roadways identified to reroute truck traffic away from residential areas.

While we support electrification in other areas like the Ports and at Railyards throughout our region, the zero-emissions bundle of investments coming out of the Draft CMIP should prioritize community-facing projects when it comes to delivering the benefits of transitioning to zero-emissions. To the extent projects solely benefit industry needs and are likely already getting funding elsewhere, they should be less of a priority for CMIP limited funds. Many of those projects, while laudable, are backed by highly lucrative and well-resourced industries that are eligible for, and are seeking funding from, other sources. When ranking these projects by order of equity criteria, the zero-emissions programs prioritizing direct benefits to the community, including local hire commitments and opportunities to expand zero-emissions cars, trucks, and transit in Corridor communities, should rise to the top of the list.

There is precedent for prioritizing investments for less-resourced parties as part of the Zero Emission initiatives. As the Draft CMIP points out, the Zero-Emissions Truck (ZET) Working Group decided to allocate \$45 million to invest in zero emission infrastructure development while leveraging the remaining \$5 million of the total \$50 million allocated as a strategic set-

⁶¹ LB-ELA Draft Corridor Mobility Investment Plan, p.8-20 and p.8-40.

aside to support small fleet owners in the transition to zero emissions.⁶² This commitment to equity should pervade zero-emissions investments.

However, the allocation that the working group committed to is not made clear throughout the Draft CMIP. For example, the fact sheet concerning the zero-emissions truck program fails to mention the \$45 million/\$5 million allocation between infrastructure and the set aside for small fleets.⁶³ The Draft CMIP is also inconsistent in describing the \$5 million set aside for small fleet operators. On one hand, the Draft CMIP describes the working group approving the entire \$5 million as part of the set-aside.⁶⁴ It later references interviews where the suggestion was for “leveraging a *portion* of the \$5 million set aside to assist small fleet owners in transitioning to ZE trucks.”⁶⁵ We recommend that Metro clarify this point by making the CMIP consistent with the working group’s recommendations.

C. The CMIP Should Focus on Deploying Strategies that Provide Direct Transportation Electrification as the Viable Zero-Emissions Solution, not Hydrogen.

In this letter, CEHAJ outlines serious concerns with directing CMIP funding to hydrogen production, transportation, storage, and fueling as the current technology fails to offer the most effective solution for the Corridor communities’ health, safety, air quality, and climate risks. By contrast, direct electrification options for zero-emissions transportation are widely available, more efficient, and pose lower risks and costs to impacted communities. We urge Metro to stay focused on its promise to deliver on community stakeholders’ vision for mobility that advances equity and sustainability. This can be accomplished by prioritizing funding for battery-electric and catenary zero-emissions transportation wherever feasible and allocating resources to projects that advance the deployment of these efficient, clean, and safe transportation modes along the Corridor. In most cases, hydrogen is more costly and carries more risk compared with direct electrification alternatives and should, therefore, not be included within the scope of the CMIP at this stage. Our concerns with directing limited public funding to hydrogen technologies include the following:

- **Safety Risks.** If not handled properly, hydrogen deployment presents potential safety risks to surrounding communities. Metro has not ruled out the use of combustible hydrogen in projects the CMIP may support, so little is known about what those projects may entail. Depending on the circumstances, the transportation, storage, and production of hydrogen have the potential to present substantial safety risks, especially if near residential areas. For already pollution-burdened Corridor neighborhoods, these risks

⁶² LB-ELA Draft Corridor Mobility Investment Plan, p.2-15.

⁶³ LB-ELA Draft Corridor Mobility Investment Plan, p.8-40.

⁶⁴ LB-ELA Draft Corridor Mobility Investment Plan, p.2-15.

⁶⁵ LB-ELA Draft Corridor Mobility Investment Plan, p.2-17.

would be too much to bear. They would only add to the immense burdens they already shoulder due to freight movement and other industrial activity in the region.

- **Air Pollution Risks.** It is unclear whether the funding would support hydrogen combustion engines. If so, hydrogen combustion carries air pollution risks, as it may result in hazardous amounts of Nitrogen Oxide (NO_x), a pollutant known to trigger ozone, which in turn disproportionately impacts health in communities near freight routes, refineries, ports, railyards, and other industrial activities.⁶⁶ Among the known health risks of increased exposure to pollution caused by NO_x include respiratory illnesses and asthma.
- **Climate and Health Risks.** The latest Intergovernmental Panel on Climate Change (IPCC) report finds that the use of fossil fuels must be phased out to avoid catastrophic warming past the 1.5°C threshold, which is long understood to be the point at which our current climate change trajectory will be irreversible.⁶⁷ Current hydrogen production is almost entirely from fossil fuel-based processes that generate significant NO_x emissions resulting in nearly 830 million tons of CO₂ per year.⁶⁸ Currently, there are no regulations in California to ensure clean hydrogen production. Additionally, it is far more efficient to use precious renewable energy resources directly as electricity than to convert them into hydrogen and then use them as fuel – approximately three times more renewable energy is needed for a hydrogen fuel cell truck to travel the same distance as a battery electric truck.⁶⁹ Hydrogen leakage is an additional climate risk; hydrogen is an indirect greenhouse gas approximately 12 times more potent⁷⁰ than carbon dioxide on a 100-year timescale and 35-40 times more potent on a 20-year timescale, which is highly relevant to our current climate crisis.⁷¹

⁶⁶ Sara Gersen and Sasan Saadat, *Reclaiming Hydrogen for a Renewable Future: Distinguishing Oil & Gas Industry Spin from Zero-Emissions Solutions*, Earthjustice Report (August 2021), p.10, <https://earthjustice.org/feature/green-hydrogen-renewable-zero-emission>; *See also*, Alissa B. Cook and Steven P. Hamburg, *Climate consequences of hydrogen emissions*, *Atmospheric Chemistry and Physics* (July 20, 2022), <https://acp.copernicus.org/articles/22/9349/2022/acp-22-9349-2022.pdf>.

⁶⁷ Intergovernmental Panel on Climate Change, *Climate Change 2023 Synthesis Report: Summary for Policymakers* (2023), p. 21, https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf.

⁶⁸ Massachusetts Institute of Technology, *Hydrogen Explainer*, Climate Portal, <https://climate.mit.edu/explainers/hydrogen>.

⁶⁹ Sam Wilson, *Hydrogen-Powered Heavy-Duty Trucks*, November 2023, <https://www.ucsusa.org/sites/default/files/2023-12/hydrogen-powered-heavy-duty-trucks.pdf>.

⁷⁰ Tianyi Sun et al., “Climate Impacts of Hydrogen and Methan Emissions Can Considerably Reduce the Climate Benefits across Key Hydrogen Use Cases and Time Scales,” *Environ. Sci. Technol.*, February 2024, <https://pubs.acs.org/doi/10.1021/acs.est.3c09030>.

⁷¹ Gersen & Sadaat, *supra*, at 19; *see also* Alissa B. Cook and Steven P. Hamburg, *Climate consequences of hydrogen emissions*, *Atmospheric Chemistry and Physics* (July 20, 2022), <https://acp.copernicus.org/articles/22/9349/2022/acp-22-9349-2022.pdf>.

More plainly put, investing in yet-to-be-defined hydrogen projects through the CMIP is not worthwhile when there are safer and more feasible methods to get to zero emissions through direct electrification. There are hydrogen applications, such as combustion, that are too risky to be included in infrastructure projects located in the very same communities that have already suffered from the freight industry's toxic legacy. Leveraging Metro's limited funding to support hydrogen projects without a clear understanding of the scope of hydrogen use and processing could rubber-stamp air pollution hazards and perpetuate the environmental injustices that have plagued communities and shortened life expectancy for individuals living in the Corridor for generations.

CEHAJ identified four potential plans that run the risk of endorsing the deployment of hydrogen projects into the very communities Metro is charged with protecting. They include the Corridor Zero-Emissions Truck Program [LB-ELA_0004], the Clean Truck Infrastructure investments [LB-ELA_0023], the Metrolink Regional Rail Line Between Union Station and Long Beach [LB-ELA_0219], and the Freight Rail Electrification Project [LB-ELA_0217], but there are potentially others. For this reason, we are calling on Metro to define the parameters around zero emissions further and include only direct electrification projects. We further reiterate our request to have a more comprehensive "health risk" score that takes a closer look at the potential for sponsored projects to exacerbate safety, air quality, and risk to climate initiatives.

D. We Do Not Want the ZET Program to be an Excuse to Further Erode Environmental Protections Such as CEQA.

We are troubled to see references in the Draft CMIP referencing some members of the Zero Emissions Truck Working Group pushing for Metro's support of efforts to erode the California Environmental Quality Act (CEQA) with a categorical exemption for ZE Charging Facilities. While we wholeheartedly support the transition to zero emissions in the Corridor and would like to see charging infrastructure developed, we cannot support such an initiative to weaken one of the few tools impacted communities have to demand greater transparency. Robust community engagement, not less, will make any Zero-Emissions charging infrastructure project successful, as has already been demonstrated.

Calls to expedite CEQA review and speed up permitting for charging infrastructure cynically ignore that this law is one of the few protections communities have to demand through analysis of impacts and proper mitigation often for health-harming consequences of projects. We ask you to rebuff these cynical efforts that would take away the most basic safety net at the worst time. As noted above, not all projects labeled "zero-emissions" are the same, and some have the potential to do more harm than good. Industry often provides anecdotes of the harms CEQA imposes but not hard evidence. If projects cannot be completed with robust public review and vetting, then they probably do not belong in communities already hard hit by pollution and

environmental burdens. While charging infrastructure will be key, we cannot bargain away the community's right to public review and transparency for the sake of expediency.

IX. Goods Movement.

The Goods Movement goal was crafted to achieve “streamlining and optimizing the efficient movement of goods and freight within and through the Corridor while simultaneously reducing air quality and health impacts to Corridor communities” caused by goods movement.⁷² There are four Goods Movement projects that are recommended for initial investment: Zero-Emission Truck Program [LB-ELA_0004], Clean Truck Infrastructure [LB-ELA_0023], Goods Movement Freight Rail Study [LB-ELA_0151], and Freight Rail Electrification Pilot Project [LB-ELA_0217]. While many of our member organizations generally support the electrification of rail, CEHAJ does not support the rail projects included in the Draft CMIP as currently described. The particular projects selected for initial investment stand in contrast to the Goods Movement goal by solely addressing industry stakeholder needs without simultaneously benefiting the communities that these rail projects will impact.

For example, CEHAJ expresses concern for the Freight Rail Study [LB-ELA_0151]. The Freight Rail Study seeks “an assessment to evaluate options for deriving greater utilization of the Alameda Corridor as a potential means for reducing truck trips in the Southern California subregion.”⁷³ This assessment would include opportunities to increase on-dock freight rail mode share, implementation of short-haul, freight rail shuttle service to new inland rail facilities, and increased use/improved operational efficiencies of existing near-dock and off-dock intermodal facilities. Based on the prior analyses, this project only received concern scores for “noise” which, without more information, CEHAJ assumes is based solely on the impacts of the study itself. However, the potential future benefits of the improvements were counted toward the overall benefits score, and possible future negative impacts were ignored. Metro should have assessed the future negative impacts of the projects the study will evaluate (such as freight rail to inland ports and increased on-dock rail) to fairly account for the tradeoffs of this study. Without it, the Draft CMIP suggests that this project comes without future concerns and only future benefits (i.e., ways to move goods onto rail and off highways) and likely artificially inflates the score this project deserves. To ensure consistency with the visions set out by the Task Force, investment in this study must come with a strong commitment to study the impacts of the freight paths project recommends, which would include impacts on bike and pedestrian safety, concentrated congestion, construction impacts, increased impervious surface, and potential for new physical barrier – particularly for inland port and railyards, all real tradeoffs for the efficiency this study is trying to promote. If the future benefits of a project were assessed, then

⁷² LB-ELA Draft Corridor Mobility Investment Plan, p. 5-12.

⁷³ LB-ELA Draft Corridor Mobility Investment Plan, p. 8-25.

the future concerns should be as well, and if Metro staff did not do this, those projects should be clearly marked or a clear explanation for why future impacts and concerns were not assessed when future benefits were included.

As a general matter, CEHAJ does not support the infusion of community investment funds into private projects that can obtain funding via other mechanisms. For this reason, CEHAJ does not support investment in the Freight Rail Electrification Pilot Project [LB-ELA_0217]. This project envisions Metro working with the Union Pacific and Burlington Northern Santa Fe 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 zero emission technology capable of entering commercial, revenue service operation. CEHAJ understands that this project is receiving heavy funding, partially in response to draft CARB regulations on locomotive emissions that will come into effect in 2030, and electrification of the railways, especially if they will reduce congestion caused by diesel trucks, is a step toward compliance. The improved health benefits for this pilot remain entirely theoretical and fail to justify how the community will receive benefits now and in the interim in the way that the Task Force envisioned. Rather than funding pilots geared to benefit well-resourced private industry, the goods movement sector would better serve the principles of the Task Force by recommitting to electrifying the now underutilized Alameda Corridor. Yet Metro anticipates investing \$10 million in Measure R/M funds in a fully private project with no guaranteed return on investment. Furthermore, this project lists potential funding from other sources such as FRA pilot programs, RAISE, INFRA, TIRCP, LCTOP, and others.⁷⁴ The 10-million-dollar investment should be distributed to other projects that would contribute a real improvement to the neighborhoods that these goods would be moving through and not subsidizing the industry's exploration of future compliance needs.

X. Conclusion.

We firmly believe that this investment plan offers an opportunity for Metro to start the process of repairing the damage caused by past harmful policies in the Corridor. When it comes to the Draft CMIP, we believe that prioritizing investments in community benefits programs, improving transit, promoting safe active transportation, and bringing community-vetted zero emissions transportation and infrastructure is essential to creating a more equitable and sustainable future in the Corridor. However, we continue to have concerns regarding the skewed prioritization of industry-led projects, the risk of displacement, and the need to better protect residents from toxic air pollution and other harms. We remain committed to helping improve the CMIP and ensure that the final investment plan benefits all residents in the Corridor equally.

⁷⁴ LB-ELA Draft Corridor Mobility Investment Plan, p. 8-24.

Respectfully,

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