

April 1, 2024

Michael Cano, Executive Officer
Countywide Planning and Development
LA Metro
One Gateway Plaza
Los Angeles, Ca 90012

**RE: LB/ELA CORRIDOR PLAN TASK FORCE – MOBILITY INVESTMENT
PLAN DRAFT - COMMENTS**

Dear Mr. Cano,

On behalf of the Los Angeles County Federation (BizFed), a diverse grassroots alliance of 240 business organizations representing 410,000 employers with 5 million employees across Southern California, we wish to comment on Metro's *Mobility Investment Draft Plan*.

In response to the Mobility Investment Plan released January 31, 2024, we appreciate and support many of the project recommendations in the proposed draft plan. However, we are concerned that many key elements important to the sustainability of a vital 710 corridor have either been absent or do not go far enough in this current draft plan. Projects such as bus stop improvements (LB-ELA_0203), safety gates at all A-Line crossings (LB-ELA_0175), traffic controls at I-710 freeway ramps (LB-ELA_0156), improvements to Shoemaker Bridge (LB-ELA_0010), and all 14 of the freeway safety and operations infrastructure improvement projects bundle will be helpful but simply are not enough given the importance of this corridor to the local community, the region, the state and nation.

BizFed's specific comments are below, in no particular order:

LOMITA BLVD./SR-47 CONNECTOR PROJECT. BizFed would like to propose an additional improvement – Paving Lomita Blvd. from Eubank Avenue to Alameda Street, along the Wilmington/Carson border and connect it with Alameda Boulevard/SR-47 to the East. Current paving on Lomita Boulevard ends just west of Alameda Street/SR-47. This is a project initiated by Los Angeles Councilmember Tim McOsker and his constituents, known as the "Lomita Blvd/SR-47 Connector Project." BizFed supports this project as Lomita Boulevard is categorized as a Highway II in the City of Los Angeles' General Plan of the adopted Mobility Plan 2035, which was also supported by BizFed in 2015. We believe this project will provide safe, quality travel options for moving people and goods, and is supported by the area residents. We urge the Task Force to include this project in your Mobility Investment Plan.

GOODS MOVEMENT FREIGHT RAIL STUDY (LB-ELA_0151).

BizFed appreciates the acknowledgement of the importance of Goods Movement in the proposed Mobility Investment Plan, however, there have already been numerous freight rail studies conducted on this corridor and yet another rail corridor study only will not go far enough to address the totality of the long-term freight movement needs of the corridor. Past conversations with Metro have included identifying the 710 as a regional corridor and not a local one. If we are going to meet California's climate goals, a corridor needs to include more alternative fuel infrastructure for electric vehicle charging and hydrogen fueling stations, an aggressive and incentivized zero emission clean truck program, and a strong coordination with the California Transportation Commission's SB 671 – Zero Emissions Freight Corridors Program, in conjunction with rail. We need to provide alternative fuel infrastructure and a clear roadmap for timely infrastructure to be in place. The industry is clear about their desire to meet California's needs in order to transition into a cleaner sector, and instead of a \$1 million study on a "freight rail plan" as proposed in the Mobility Investment Plan, we feel those funds could be better spent on a "whole of government" approach to expedite infrastructure investments to achieve our goals.

CONGESTION PRICING AND ZET REQUIREMENTS. The Mobility Investment Plan includes several duplicative and "not yet ready for primetime" efforts that can be confusing for the goods movement industry. For example, any mention of Zero Emissions Truck (ZET) lanes or ZET travel zone restrictions should be removed. This is redundant as the California Air Resources Board (CARB) has already adopted Advanced Clean Truck regulations (2021) that seek to go into effect later this year. The Alameda Corridor "electrification" is not viable and has been studied several times over decades; H₂-fuel cell technology may eventually be the technology for long-haul freight. The Mobility Investment Plan document should merely denote studying any ZE tech for locomotives and not make a specific notation about the Alameda Corridor. Metro originally began its Traffic Reduction Study (congestion pricing) in 2020 and has since continued with its listening sessions. While the goal of the program is to look at reducing traffic as well as reducing air and climate pollution, there is no clear roadmap as to how the Goods Movement Industry fits into this equation. This is largely because details on pricing, technology and project revenue are unknown at this time. As a result, we request to remove the proposal of congestion pricing for the goods movement industry until Metro can provide detailed information on how and if this program is viable.

INTERCHANGE IMPROVEMENTS. As mentioned in the beginning of this letter, BizFed supports all 14 of the freeway safety and operations infrastructure improvement projects bundle for two reasons:

- 1) The safety and movement of people and goods through the area
- 2) Enhancement to regional accessibility

We urge the Task Force to double-down on making commitments towards interchange improvements. Interchange connectivity plays a pivotal role in enhancing regional accessibility, enabling efficient movement of people and goods across different modes of transportation. It involves the seamless integration of various transportation systems, such as railways, highways, airports, and ports, to facilitate smooth transfers and connections for travelers and cargo. By optimizing interchange connectivity, regions can unlock numerous benefits, including improved transportation efficiency, enhanced economic growth, increased safety for people traveling in all modes, including active transportation, and increased convenience for commuters. Additionally, investments in interchange connectivity have the potential to spur economic growth in regions by attracting businesses, encouraging tourism, and facilitating trade. When regions are well-connected through efficient interchange facilities, it becomes easier for companies to transport goods and access markets, leading to increased trade opportunities.

We urge the Task Force to adopt the above comments in your Draft Mobility Investment Plan, and as a voting member of the Task Force, we reserve the right to "support (only) if amended" on the proposed draft plan. If you have any questions, please don't hesitate to contact our Senior Advocacy Manger Chris Wilson at (562) 201-6034.

Sincerely,



Fran Inman
BizFed 2024 Chair
Majestic Realty



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.



David Englin
BizFed President

CC: Metro Long Beach/East LA Corridor Plan Task Force

BizFed Association Members

Action Apartment Association
Advanced Medical Technology Association
Alhambra Chamber
American Beverage Association
Antelope Valley Chamber formerly Lancaster Chamber of Commerce
Apartment Association of Greater Los Angeles
Apartment Association of Orange County
Apartment Association, CA Southern Cities, Inc.
Arcadia Association of Realtors
AREAA North Los Angeles SFV SCV
Armenian American Business Association
Armenian Trade & Labor Association
Arts District Los Angeles
ASCM Inland Empire Chapter
Asian American Advertising Federation- 3AF
Associated Builders & Contractors SoCal (ABC SoCal)
Associated General Contractors
Association of Independent Commercial Producers
AV Edge California
Azusa Chamber
Bell Chamber
Beverly Hills Bar Association
Beverly Hills Chamber
BioCom
Black Business Association
BNI4SUCCESS
Boyle Heights Chamber of Commerce
Bridge Compton Org
Building Industry Association - LA/Ventura Counties
Building Industry Association of Southern California
Building Industry Association- Baldyview
Building Owners & Managers Association of Greater Los Angeles
Burbank Association of Realtors
Burbank Chamber of Commerce
Business and Industry Council for Emergency Planning and Preparedness
Business Resource Group
Calabasas Chamber of Commerce
CalAsian Chamber
CalChamber
California Apartment Association- Los Angeles
California Asphalt Pavement Association
California Bankers Association
California Business Properties
California Business Roundtable
California Cleaners Association
California Contract Cities Association
California Fashion Association
California Fuels & Convenience Alliance- Formerly California Independent Oil Marketers Association (CIOMA)
California Gaming Association
California Grocers Association
California Hispanic Chamber
California Hotel & Lodging Association
California Independent Petroleum Association
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Natural Gas Producers Association
California Restaurant Association
California Retailers Association
California Self Storage Association
California Small Business Alliance
California Society of CPAs - Los Angeles Chapter
California Trucking Association
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
Central City Association
Century City Chamber of Commerce
Chatsworth Porter Ranch Chamber of Commerce
Citrus Valley Association of Realtors
Civil Justice Association of California CJAC
Claremont Chamber of Commerce
Commerce Business Council formerly Commercial Industrial Council/Chamber of Commerce
Community Foundation of the Valleys
Compton Chamber of Commerce
Compton Community Development Corporation
Compton Entertainment Chamber of Commerce
Construction Industry Air Quality Coalition
Construction Industry Coalition on Water Quality
Council of Infill Builders
Crenshaw Chamber of Commerce
Culver City Chamber of Commerce
Downey Chamber of Commerce
Downtown Center Business Improvement District
Downtown Long Beach Alliance
DTLA Chamber of Commerce
El Monte/South El Monte Chamber
El Segundo Chamber of Commerce
Employers Group
Energy Independence Now EIN
Engineering Contractor's Association
EXP The Opportunity Engine
FastLink DTLA
Filipino American Chamber of Commerce
Friends of Hollywood Central Park
FuturePorts
Gardena Valley Chamber
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Greater Antelope Valley AOR
Greater Bakersfield Chamber of Commerce
Greater Coachella Valley Chamber of Commerce
Greater Downey Association of REALTORS
Greater Lakewood Chamber of Commerce
Greater Leimert Park Crenshaw Corridor BID
Greater Los Angeles African American Chamber
Greater Los Angeles Association of Realtors
Greater Los Angeles New Car Dealers Association
Greater San Fernando Valley Chamber
Harbor Association of Industry and Commerce
Harbor Trucking Association
Historic Core BID of Downtown Los Angeles
Hollywood Chamber
Hospital Association of Southern California
Hotel Association of Los Angeles
ICBWA- International Cannabis Women Business Association
Independent Cities Association
Independent Hospitality Coalition
Industrial Environmental Association
Industry Business Council
Inglewood Board of Realtors
Inland Empire Economic Partnership
Irwindale Chamber of Commerce
Kombucha Brewers International
La Cañada Flintridge Chamber
LA County Medical Association
LA Fashion District BID
LA South Chamber of Commerce
Larchmont Boulevard Association
Latin Business Association
Latino Food Industry Association
Latino Restaurant Association
LAX Coastal Area Chamber
Licensed Adult Residential Care Association- LARCA
Long Beach Area Chamber
Long Beach Economic Partnership
Long Beach Major Arts Consortium
Los Angeles Area Chamber
Los Angeles Economic Development Center
Los Angeles Gateway Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles LGBTQ Chamber of Commerce
Los Angeles Parking Association
Los Angeles Regional Food Bank
Los Angeles World Affairs Council/Town Hall Los Angeles
MADIA Tech Launch
Malibu Chamber of Commerce
Manhattan Beach Chamber of Commerce
Marina Del Rey Lessees Association
Marketplace Industry Association
Monrovia Chamber
Motion Picture Association of America, Inc.
MoveLA
MultiCultural Business Alliance
NAIOP Southern California Chapter
NAREIT
National Association of Minority Contractors
National Association of Theatre Owners CA/Nevada
National Association of Women Business Owners
National Association of Women Business Owners - LA
National Association of Women Business Owners-California
National Federation of Independent Business Owners California
National Hookah
National Latina Business Women's Association
Norwegian American Chamber of Commerce
Orange County Business Council
Orange County Hispanic Chamber of Commerce
Pacific Merchant Shipping Association
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber
Pasadena Foothills Association of Realtors
PGA
Pharmaceutical Care Management Association PhRMA
Pico Rivera Chamber of Commerce
Pomona Chamber
Rancho Southeast REALTORS
ReadyNation California
Recording Industry Association of America
Regional CAL Black Chamber, SVF
Regional Hispanic Chambers
San Dimas Chamber of Commerce
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber of Commerce
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Secure Water Alliance
Sherman Oaks Chamber
South Bay Association of Chambers
South Bay Association of Realtors
South Gate Chamber of Commerce
South Pasadena Chamber of Commerce
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc.
Southern California Water Coalition
Southland Regional Association of Realtors
Specialty Equipment Market Association
Sportfishing Association of California
Structural Engineers Association of Southern California
Sunland/Tujunga Chamber
Sunset Strip Business Improvement District
Swiss American Chamber of Commerce
Thai American Chamber of Commerce
The LA Coalition for the Economy & Jobs
The Los Angeles Taxpayers Association
The Two Hundred for Homeownership
Torrance Area Chamber
Tri-Counties Association of Realtors
United Chambers - San Fernando Valley & Region
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
Urban Business Council
US Green Building Council
US Resiliency Council
Valley Economic Alliance, The
Valley Industry & Commerce Association
Venice Chamber of Commerce
Vermont Slauson Economic Development Corporation
Veterans in Business
Vietnamese American Chamber
Warner Center Association
West Hollywood Chamber
West Hollywood Design District
West Los Angeles Chamber
West San Gabriel Valley Association of Realtors
West Valley/Warner Center Chamber
Westchester BID
Western Electrical Contractors Association
Western Manufactured Housing Association
Western Propane Gas Association
Western States Petroleum Association
Westside Council of Chambers
Westwood Community Council
Whittier Chamber of Commerce
Wilmington Chamber
World Trade Center