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December 13, 2021

Re: Comments Regarding the I-710 Task Force Community Engagement Strategy

Dear Metro and Caltrans Leadership:

On behalf of the undersigned organizations and members of the Coalition for Environmental Health & Justice (“CEHAJ”), we write regarding the current status of the Los Angeles County Metropolitan Transportation Authority’s (“Metro”) and California Department of Transportation’s (“Caltrans”) I-710 South Corridor Task Force (“Task Force”) efforts to improve community engagement along the I-710 Corridor Project.

As of the writing of this letter, there have been two Task Force meetings (September 13, 2021 and November 8, 2021) with a third scheduled for December 13, 2021. At the November 8th Task Force meeting, Metro actively discussed questions presented to workgroups to assess the needs of impacted residents, as well as discussed how best to facilitate community involvement in the Task Force process, beyond Task Force representatives. Metro staff also presented a diagram summarizing the seven stages of the Task Force’s work plan, visually illustrating the “consensus checkpoints” on the way

to the Investment Plan. At the conclusion of this process, the Task Force must present the Plan to the Metro Board in spring 2022. Metro staff captured key themes, discussed the meaning of “consensus,” and promised that a charter would guide the public engagement process that Metro Board has commissioned the Task Force with creating.

Since the November 8, 2021, Task Force meeting, Metro staff have released a number of documents summarizing a proposed community engagement strategy and decision-making structure. A draft charter was circulated to Task Force members on November 18, 2021, laying out the need for and responsibilities of an Executive Steering Committee and Community Advisory Committee (now Community Leadership Committee). The draft charter also laid out the framework for Workgroups whose purpose is to dive into more specific and technical details of any I-710 programs (such as the Clean Truck Program Workgroup which is already active). Other Workgroups that have been created since then include the Community Engagement Strategy Workgroup and Charter Workgroup—tasked with formulating the details of the Task Force Charter, Community Leadership Committee and Executive Steering Committee. A formal vote on the Executive Steering Committee is projected for January 2022.

CEHAJ is encouraged by Metro staff’s commitment to detail and willingness to include community and stakeholder input when designing the Task Force, the various supporting committees and workgroup processes. The greatest concern raised by the current documentation is the timeline set out by Metro staff. It goes without saying that the current plan is comprehensive and meeting-intensive. Staff envision seven stages of progress (see **Figure 1** below), of which Stage 1 is projected to be completed in January 2022.

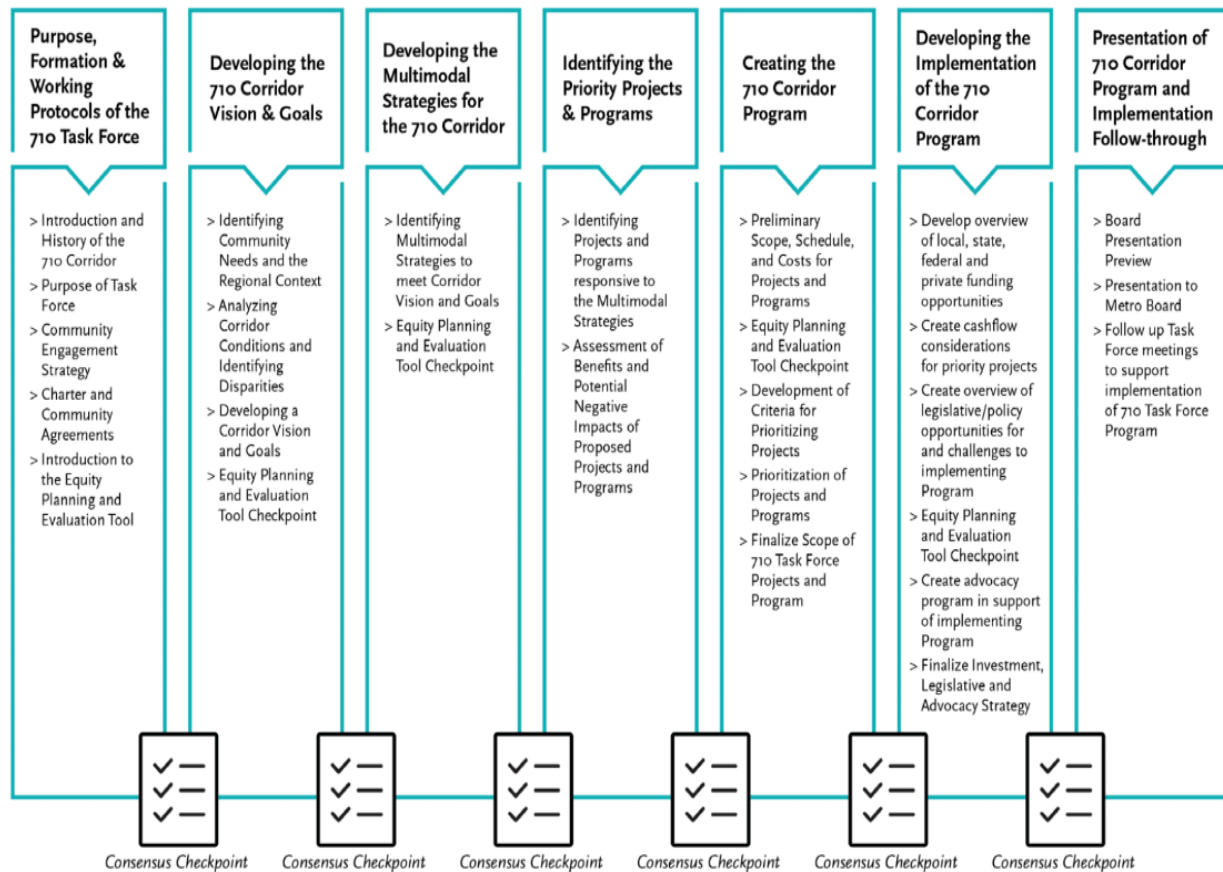


Figure 1: Charter Workplan presented at November 8, 2021 Task Force meeting on page 8 of the summary materials. Each column represents a “stage” as referenced in this letter.

The remaining stages, as described in the materials, involve more information gathering and comprehensive review of technical data which, in no uncertain terms, will take longer to finalize than the logistical details encompassed in Stage 1. Simply put, the plan Metro staff has offered, while encouraging, cannot be completed by May 2022 if it is to fulfill the Task Force’s commission to create an Investment Plan for the I-710 Corridor through meaningful community engagement.

Our hope is that by providing this letter, the Task Force and Metro staff will be moved to immediately do the following:

- Commit in writing to extending the deadline to complete Task Force responsibilities until September 2022, at the earliest. We believe the Task Force needs more time to meaningfully complete the plan as currently laid out, especially the development of a robust community engagement strategy. If the Task Force takes the time to do this well, it can potentially serve as a workable framework for other future transportation projects.
- Commit to a fixed schedule of meetings for all groups, provide notice of meeting at least 1 week prior to the scheduled date, and circulate the agenda and any other meeting materials along with the notice. For example, the Task Force seems to meet on the 2nd Monday of every month, but this has not been verbalized or confirmed.

Furthermore, in the spirit of a collaborative process CEHAJ offers the following comments to assist with formalizing the Task Force design to facilitate efficiency in the later stages of the Task Force Work Plan:

- Values
 - **Comment #1:** “Cooperation Between Equals” was a value Metro staff elevated in its presentation about the Task Force charter. It should be clarified how community members will be considered equals within this process. For example, would involvement in Workgroups be the only opportunity for non-Task Force members’ input to be included in a proposal?
 - **Comment #2:** Clarify when the Equity Planning & Evaluation Tool will be used, and which entity is responsible for its administration (i.e. will the Community Leadership Committee use the Tool to review proposals coming out of Workgroups, or will Workgroups be required to use the Tool to formulate proposals?).
- Community Leadership Committee
 - **Comment #3:** The proposed Community Leadership Committee community member selection process options (nomination or application) seem hierarchical and not community-inclusive. The process to create and select the CLC needs to be driven by community members. This can include hosting community specific meetings and focus groups where community residents feel safe to voice their preferred structure and representatives of the community. If there is any selection process, community residents should be central to it.
- Workgroups
 - **Comment #4:** Explain how Workgroup participation, structure and meeting frequency is decided. CEHAJ’s position is that anyone should be allowed to participate, and these spaces should be open forums for all communities interested—not just representatives currently participating in the Task Force and other individuals assigned to workgroups.
 - **Comment #5:** Explain how Workgroup proposals are finalized, and by whom, before presentation to the Task Force.
 - **Comment #6:** Provide an explanation for the use of Workgroups in the completion of the remaining stages of the Task Force Work Plan, including who drafts and presents proposals for vote. It appears Workgroup proposals are the heart of Task Force decisions; however they are only described as being created “as needed”. It needs to be clear who creates proposals in the absence of Workgroups.
- Meetings Concerns
 - **Comment #7:** Clearly define the purpose and deliverables of any meeting. To date, all meetings seem to discuss similar issues without a clear explanation of the intended deliverable and how they build onto one another in each stage of the Task Force structure.

- **Comment #8:** Explain how the Workgroups, Executive Steering Committee, Community Leadership Committee and the full Task Force interact. The frequency of meetings as presented currently do not align with the magnitude of issues that need to be resolved to formulate an Investment Plan. Our concern is that without clear transparency and direction in internal communications, these bodies may become complicated, redundant and by default create inaccessibility for members.
- **Communication**
 - **Comment #9:** The webinar format is inaccessible to many individuals and not conducive to sharing or promoting public comment. We appreciate that Metro staff shifted away from this format for the second Listening Session on December 9, 2021 and would encourage this for all meetings, not just Listening Sessions.
 - **Comment #10:** We strongly suggest formally documenting what is raised in meetings and listening sessions by sharing out notes and minutes and getting feedback from participants to ensure accuracy. This has been started for the Task Force meetings and we believe the Executive Steering Committee, Community Leadership Committee and Workgroups would benefit from this to maintain transparency. For example, in starting the Clean Truck Program (CTP) Work group, Metro confirmed that it is not pursuing the old CTP that was previously discussed as part of the 710 widening project that was abandoned. Instead, Metro is starting an entirely new program through stakeholder input- one that will focus exclusively on zero-emissions solutions for any investments being made. Metro should document these commitments in writing as it moves forward with new programs related to the 710.

We appreciate your consideration of the issues raised in this letter and look forward to our continued partnership and collaboration.

Sincerely,

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Long Beach Alliance for Children With Asthma

Laura Cortez

East Yard Communities for Environmental Justice

Jen Ganata

Dilia Ortega

Communities for a Better Environment

Kimberly Leefatt

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Natural Resources Defense Council

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Cc: Metro Board of Directors