

# Long Beach - East Los Angeles Corridor Mobility Investment Plan

## Comments and Responses



Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
<b>Community Meetings</b>					
<b>Commerce Community Meeting</b>					
Commerce Community Meeting	Sylvia Betancourt	Task Force, LBACA	02/01/24	Important to look at the 710 freeway and see the ways that it impacts Commerce. We aren't widening the freeway but are we increasing truck traffic? What impacts will there be for pedestrian safety (walking cycling)	<p>"The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>Multimodal Improve freeway overcrossings so that they provide multimodal benefits and ""reconnect LB-ELA Corridor communities"" separated by the freeway and river – safer pedestrian/bicycle crossings, improved reliability and effectiveness of bus/transit, improved arterial traffic flow to reduce accidents and pedestrian/bicycle conflicts</p> <p>Operational Safety-focused auxiliary lanes that provide transition zones for cars and trucks to more safely merge on and off the freeway at locations with greater numbers of accidents than a simple ramp design can address: Safety for residents/users at local access points</p> <p>Safety Provide safer conditions for all users of the freeway and local interchanges, especially community members accessing the freeway. Reduced conflicts for cars and trucks getting on and off the freeway: improved on and off ramps, transition zones, turn radius, traffic signal controls.</p> <p>Access Greater access to bus service, pedestrian/bicycle paths, and personal mobility leading to greater access to communities, education, healthcare, and other economic opportunities. Safer local access to the freeway system. "</p>
Commerce Community Meeting	Sylvia Betancourt	Task Force, LBACA	02/01/24	There should be many safe ways to use the street keeping in mind quality of life and health.	Thank you for your comment. We are committed to supporting projects that advance the vision and goals of the corridor which specifically focuses on health, quality of life and safety.
Commerce Community Meeting	Anonymous	N/A	02/01/24	Alameda corridor- is there a possibility of being used for transit to alleviate congestion in freeways?	
Commerce Community Meeting	Anonymous	N/A	02/01/24	How can we identify the specific projects and programs in our communities?	
Commerce Community Meeting	Veronica	La Palma Resident	02/01/24	Request for more public transit options from Commerce to La Palma.	
Commerce Community Meeting	Anonymous	N/A	02/01/24	How can we get communities involved in the meetings?	
Commerce Community Meeting	Sylvia Betancourt	Task Force, LBACA	02/01/24	Request to connect the Bristow Park and Bandini Park in Commerce. (Verbal comment to Michael)	Projects can be added to the Modal Programs through the Working Groups established once the Investment Plan is adopted by the Task Force and Metro Board. See Chapter 9 that describes more details about the structure of the Working Groups for the Modal Programs.
<b>Lynwood Community Meeting</b>					
Lynwood Community Meeting	Anonymous		02/07/24	I was happy to see funds that were set aside for the expansion of the 710 that took so long to get the attention of the people in charge, who do not live in this area, is going towards other things we actually need. What I hear from bus riders is that we need cover at bus stops. We need to have the bus schedule available at bus stops. People that really depend on the bus service would find great use out of having the bus schedule announced and available to them at the stop. It makes me feel hopeful that people are listening to us as taxpayers. We deserve to have these improvements in our area.	Yes, and the \$730 million comes from taxes paid by community members.

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Lynwood Community Meeting	Anonymous		02/07/24	(1/2) I'm excited to see more details about the projects. On the timeline slide, it showed that there would be a presentation in March before the Metro Board. What will be reported? Will any projects be voted on at that meeting? (2/2) Is this definitive? What is the plan to constantly keep community members informed about the schedule and development of these projects? Can you elaborate on why community projects are such a small percentage?	Report to the Metro Board: last Wednesday, we published the draft Investment Plan. The draft is well-researched and well-documented, but it's a draft. And that's what you have before you today. At its core are the transportation projects. On the fourth Thursday, when the Metro Board meets, the final Investment Plan will be presented. The public comments we are receiving during the public comment period will be included in the revisions of the Investment Plan. The CLC will meet later this month, discuss the draft Investment Plan, and then vote on it. And there has to be a 60% approval. This plan will be informed by community input, stakeholder inputs, etc. Regarding the low percentage of community projects, Metro wants to work with communities and community-based organizations to seek additional grants. Metro cannot use transportation funds for such programs. Collaborating with communities to achieve an increase in grant funding for community programs is a main focus for Metro.
Lynwood Community Meeting	Sinetta Farley	CLC, East Rancho Dominguez	02/07/24	I wanted to say that this has not been an easy task. A lot of time was invested in these meetings, many questions were asked. I guess what I'm trying to say is that this report is simply a formality for Metro. There were many questions from the community. Mostly, it took our personal time to sit and listen to the staff, debate and discuss ideas, have Metro and the technical team explain what they meant or what the plans were. There was significant community participation. I represent East-Rancho Dominguez and joined the Community Leadership Committee in March 2020.	The CLC has met every month, sometimes twice a month. There have also been office hours with 1 on 1 time between the CLC, Metro, and the project team.
Lynwood Community Meeting	Anonymous		02/07/24	It can be noted in the report that many, many hours were invested in this. I want to take the opportunity tonight because you mentioned the high percentage of female users on the Metro. Women have expressed their feelings about safety on public transport. I've been commuting by train since the B Line started. My coworkers warned me about public transportation. It was always an incident-free experience. However, times have changed, and I've read some really distressing experiences in the LA Times about incidents on the train.	We have implemented a multi-faceted approach to our safety. They are not law enforcement, but they assist our users with safety. If there's an incident, then they report it to the Los Angeles Police Department (LAPD). We also have workers checking that the fare has been paid. Metro is currently considering developing our own security force so we don't have to subcontract to the LAPD or Long Beach Police Department (LBPD). We are also deploying PATH, working mostly with the county, to help homeless users connect with resources.  This feedback, and we have heard similar feedback from other users, is being continuously reviewed by Metro and implemented in the final plan."
Lynwood Community Meeting	Anonymous		02/07/24	I understand that community programs cannot be funded with transportation funds. Much of the proposed funding at the state and local level needs to incorporate community participation. How is community participation different from community programs?	Community participation is taken very seriously by Metro. Community participation will be integrated into any community program that is implemented. It is part of our process.  As part of its practice at Metro, major projects carried out by cities or counties communicate with Metro about community participation/outreach. If a project is going to disrupt streets or paths, counties and cities notify Metro. It's a collaboration."
<b>Long Beach Community Meeting</b>					
Long Beach Community Meeting	Kerry Beth Larick	Car Lite LB	01/12/24	Please divest from freeways and cars and invest more into active transportation and Bus Rapid Transit (BRT). If you want equity, you will make these forms of transportation a priority. Also, while addressing safety and crashes, please include which parts of the plan are dedicated to Vision Zero efforts.	

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Long Beach Community Meeting	Joshua Dungea		01/12/24	<ol style="list-style-type: none"> <li>1. Reduce the disproportionate share of investment towards freeway improvements. More towards transit and compact streets.</li> <li>2. Funding for electrifying freight rail is great, but freight rail monopolies are notorious for not budging towards sustainable initiatives. I'm afraid investing in this would produce little rewards.</li> <li>3. Implement traffic calming features that work in with speed limit reductions. Long Beach has passed the second part.</li> <li>4. Better signal priority, it not signal exemption, along the Blue Line. Reduced delay, better service overall</li> </ol>	Thank you for the comment. The final CMIP includes a higher level of investment for transit and active transportation. We believe the projects recommended in the investment plan support the vision and goals of the corridor as outlined in your comment.
Long Beach Community Meeting	Enrique Hernandez		01/12/24	I'm a bit concerned about the vagueness of the funding for the community programs. I feel if there was more direction, I would be inclined to be satisfied with the low numbers.	Thank you for the comment. The final CMIP includes a section on implementation and more detail on the working groups and community programs.
Long Beach Community Meeting	Erin Hopes	Car Lite LB	01/12/24	We need protected bike lanes to cross the I-710 and LA river. This is especially important at Willow Ave. in Long Beach and Firestone in South Gate.	
Long Beach Community Meeting	Marilyn Olivares	CBE	01/12/24	My concern is that the budget and future projects will continue to promote equity and health but will not actually move forward with community saving projects and for fixing community roads.	Thank you for the comment. Metro is committed to continuing to work with the community and our working groups to ensure our funding commitments continue to support the vision and goals of the corridor.
Long Beach Community Meeting	Uriah Blackwell	CBE	01/12/24	What is the direct method Metro plans to engage local communities around the corridor to ensure local partners and community members gain the job opportunities this project would create? Are there already plans to make this commitment tangible?	
Long Beach Community Meeting	Stephanie Gomez	SOW Collective	01/12/24	Hello, I would like to learn/ participate in a community task force focused on equity, bus shelters, and sustainable gen initiatives.	
Long Beach Community Meeting	William Frankfield	Resident	01/12/24	Metro needs more funds for bus improvements especially on the Atlantic and Long Beach Blvd corridor. LA Metro needs to accelerate the Compton Transit Management Operations Center Enhancements.	
Long Beach Community Meeting	Ozzip	CBE	01/12/24	One concern I have is that during the presentation it was mentioned that the number one concern with projects along the 710 was air quality. However, there were no projects mentioned to completely and explicitly increase air quality *NOW* More should be stated for clean air.	Thank you for your comment. Acknowledging that large infrastructure projects can take years before they are implemented, the investment plan includes projects and programs of different scales and timelines that can improve air quality in the short and longer term. Improvements such as air filtration in schools, vegetation, health screenings can be deployed quickly and will be implemented through the community health benefit program.
Long Beach Community Meeting	Paola Vargas	East Yard	01/12/24	Our communities need to have a wide array of funds allocated to community benefits and programs. We need green zones, zero emission infrastructure to mitigate public health concerns, local hiring/workforce programs, bike lanes, increased safety measures, etc.	Thank you for the comment. We are committed to supporting projects that advance the vision and goals of the corridor and address the issues raised in your comment.
Long Beach Community Meeting	Adriana Garcia	LANCT	01/12/24	I would love to prioritize funding for green space buffers as it relates to public health issues from freeway pollution.	Thank you for the comment. We are committed to supporting projects that advance the vision and goals of the corridor and address the issues raised in your comment.
Long Beach Community Meeting	Elsa Tung	KE Impact LLC	01/12/24	Current plan has over investment in freeway projects, under investment in transit and active transportation, especially \$170.6M freeway initial investment vs. \$29.0M transit initial investment (freeway nearly 6 times transit). Need to push cities to ID transit projects for initial up-front investment.	Thank you for the comment. The final CMIP includes a higher level of investment for transit.

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Long Beach Community Meeting			01/12/24	What is being done differently with these auxiliary lanes than the ones currently in the Council of Governments Gateway Cities on the 91? We were told improving weaving patterns is safer but with air quality and induced demand when increasing car capacity, it's hard to believe. What other truck safety weaving pattern improvements can be done without increasing capacity for cars?	<p>The initial investments include a package of 12 operational safety improvements that will be assessed once the Task Force and Metro Board approve the Plan. Other truck safety weaving pattern improvements will be evaluated at that time for induced demand and increases in VMT.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>Multimodal- Improve freeway overcrossings so that they provide multimodal benefits and "reconnect LB-ELA Corridor communities" separated by the freeway and river – safer pedestrian/bicycle crossings, improved reliability and effectiveness of bus/transit, improved arterial traffic flow to reduce accidents and pedestrian/bicycle conflicts</p> <p>Operational Safety-focused auxiliary lanes that provide transition zones for cars and trucks to more safely merge on and off the freeway at locations with greater numbers of accidents than a simple ramp design can address: Safety for residents/users at local access points</p> <p>Safety- Provide safer conditions for all users of the freeway and local interchanges, especially community members accessing the freeway. Reduced conflicts for cars and trucks getting on and off the freeway: improved on and off ramps, transition zones, turn radius, traffic signal controls.</p> <p>Access - Greater access to bus service, pedestrian/bicycle paths, and personal mobility leading to greater access to communities, education, healthcare, and other economic opportunities. Safer local access to the freeway system.</p>
Long Beach Community Meeting	Kirk			On the slides referring to \$743 million-Freeway is 30% Metro Funding, for the \$3.2 billion leveraged funding -but it balloons to 34% and 29% complete streets. My concern is that so much of this funding is going to the freeway. Amount of active transportation starts to diminish. Once again, we are focusing on cars.	We are balancing projects across modes. We don't want to see silo projects-all projects are interconnected. Amount-freeway projects cost more. Leveraged dollars will be much more. All freeway projects will undergo CEQA/NEPA, new community engagement process.
Long Beach Community Meeting	Kirk			What does development, pre-implementation, implementation mean?	Pre-implementation-environmental review/community engagement needed before moving forward/determining whether it moves forward; Development-concepts/ideas-especially on the equity side. Will need discussion planning work, best practices-to get it to pre-implementation.
Long Beach Community Meeting	Stephanie Gomez	SOW Collective		1-Equitable and Sustainable--how much funding is going into Equity Initiatives? 2-What are the equity initiatives?	1-Equity Considerations-investments they would like to see uplifting quality of life in their communities (Cbo's). \$40 million into community programs. We cant put more funding-because sales tax for transportation funding. Metro will identify partners to help us develop funding plans. \$40 million is a catalyst for these programs. We need to ground truth this information. 2- We are looking at a lot of projects. Map of EFC's. Under resourced communities. Modal Programs-\$almost \$300 million-10% is for Technical Assistance and funding leverage. 3-Public Health-tied to the trucks. We are aware of "Diesel Death Zone" \$50 ZET program - to invest and accelerate ze trucks and infrastructure. PM from road dust, wear and tear. 4-Equity on Transit - quad gates, 19 million-bus shelters-we will try to leverage this 4 times \$76 million . How do we use funds now? How do invest in communities with equity needs? Office of Equity and Inclusion. EWG. Goods Movement-move cargo by trains instead of truck. Arterial roadway-no increased lanes. more complete streets focus to promote increased community usage. We are not stopping the engagement. We will continue engagement. We will revise plans according to ongoing community feedback. This is the most comprehensive community engagement process. Equity is the central point of the plan. We cant just say it. We have to do it.
Long Beach Community Meeting	Monseratt			Communities for a Better Environment -I live and go to school in Southeast LA. I am concerned about hydrogen-fossil fuels and co2. Would like to see protected bike lanes. Free Bus Transit.	Your comments regarding fares - we've heard. There is a youth pilot program. Metro Board is looking at this for the whole system. Hydrogen-there are some unknowns- we don't know about having a facility; pipeline. We have a ZET - we are looking at electric and hydrogen. We have a vetting process with communities. Before we invest in technology/infrastructure, we will engage with the community. Protected bicycle lanes-we realize many bike lanes-competing lanes for cars/trucks. We are working with local communities on this. We are going to learn more. There is funding for this. Complete streets will incorporate this. We know that noise and pollution from the freeway issues. We are working with Caltrans to look into sound walls. Sound walls are part of community protection.
Long Beach Community Meeting	William			Freight Improvements-there needs to be more funding electrification. Decarbonization. Reduce Congestion. I agree with his comments regarding improving bus lanes. None of us want more investment in the freeways.	Freeways-we are also looking at overcrossings i.e. Florence going over the freeway-unsafe; not moving quickly. This is a multimodal plan. Interchange at Florence-we want to improve access safety for pedestrians, bicyclists, etc.
Long Beach Community Meeting	Elsa Tung	KE Impact LLC		Appreciate the comments so far. Digging into these numbers. Piggybacking on previous comments. Initial investment numbers-Freeways \$170 million vs \$29 million transit. 6-fold difference. I appreciate what you're saying. These projects are complex and interrelated. The discrepancy of funding is vast. The money going out the door vs what is going out in 20-30 years is vast.	Some projects like Southeast Gateway Light Rail-federalized funding. Transit projects-2-3 year window. We need to develop projects and then get funding. Readiness funding is impacting us. Over the course of the plan, we want balanced approach. Some projects - Atlantic Complete Streets can be funded tomorrow. Readiness and alignment of vision, goals, guiding principles-evaluation process. I am hearing - we would like to see more investment on the front end for transit projects.

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Long Beach Community Meeting	N/A			How is that not expansion? How will there not be displacement?	Auxiliary lanes- comparable to ramp extenders. Trucks need more space to exit the freeway. There is more opportunity to negotiate how to get on/off, prevent accidents. CEQA/NEPA will be employed. We know it's a loaded issue. Safety is critical.
Long Beach Community Meeting	N/A			Regarding the Investment Summary and transit programs, I see 4 bus lane corridors. How long are we working on Vermont Bus Corridor? 1/2 million for Slauson. 1/2 million for Vermont. It feels like these are the things you put on paper. They sound like auxiliary lanes. We are going to think about getting the Environmental Impact Report together for these projects. We keep having great plans to get from one onramp to another offramp. Pre-implementation-what are we even doing? Bus corridor projects will take 5-6 years. Those have been years and years with those promises and nothing has been done. We should put more funding into transit programs.	Bus lanes, roads improvements-we have to work with local jurisdictions. Metro cant make these decisions alone; these are some complications, not an excuse. We don't know the full cost of many projects; city by city-not every city will agree with a full bus lane on their roadway. Transit-Arterial Roadway-Active Transportation-are all interconnected..
Long Beach Community Meeting	N/A			You know freeway safety improvements scale better. It seems like the percentage on the left (initial investment and modal programs) should be less than 30%. Its more important to maximize funding for what we want rather than the level funding as listed here.	This is a living document. This is a starting point. Please voice what you like to see.
<b>Compton Community Meeting</b>					
Compton Community Meeting	Anonymous Attendee		02/21/24	Are other complete streets going to be considered moving forward beyond what is shown in the list of projects?	This is a starting point. Funding and projects will evolve as this process continues. This list shows what we are investing in to start with.
Compton Community Meeting	Anonymous Attendee		02/21/24	Will there be projects to make bus stops and surrounding areas look nicer and make people more encouraged to use these new initiatives?	We will work with landowners/developers to help improve appearance and visibility. Land use is an ongoing part of this process.
Compton Community Meeting	Anonymous Attendee		02/21/24	Are you taking into account the perspective and experiences of young Metro riders?	One of the things we looked for with the CLC was a wide range of ages. We had the younger demographic represented amongst a few CLC members. I think that is something we can take back as feedback to focus on broadening our youth outreach moving forward.
Compton Community Meeting	Phyllis Ollison	CLC, Compton	02/21/24	Can you expand upon the Investment Plan's definition of 'equity'? I know that is something we spent a lot of time on in the CLC meetings.	Our office of Equity and Race worked with our project team, the CLC, and the Task Force on developing a clear understanding of Equity as a principle. We have been focused on repairing past harms, identifying disparities, and how to intentionally invest in this plan in a way that recognizes those past harms and move forward in an equitable way. There might have been voices before that were not recognized or included and so we have developed our plan around fixing that. So Equity, if you are looking at it from how we approached it, every project is looking at how disparities can be addressed and existing conditions can be improved.
<b>Paramount Community Meeting</b>					
Paramount Community Meeting	Irma Lopez	CLC, Cudahy	03/13/24	When you talk about diesel becoming electric, are you referring to all kinds of transportation or only heavy load trucks? Will all of them be gas and electric, or only electric?	Our investment is for heavy duty trucks. We are investing 50 million dollars to create a network of charging stations that will help people go from diesel to electric as soon as possible. We are also looking at doing the same for locomotive trains. We have support from a community program to help cities develop charging stations for personal vehicles. Our vision is a zero-emission corridor for trucks, trains, vehicles, buses. We are not doing anything lower than zero-emission.

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Paramount Community Meeting	Anonymous Attendee	N/A	03/13/24	I am a bus rider, my main concern is safety. We have a lot of issues with homeless people riding buses. The ambassador program is a waste of time and money. People start fighting and when ambassadors see it, they just walk away. The buses and trains are very dirty. I always have an issue with this kind of presentation, we have people who don't ride the bus so they do not understand what is going on. My main focus is always the community and what's going on. I am glad to see community members here, but what about people who do not have the time to travel to these meetings? A lot of little things add up that can be improved. For me, I love riding the Metropolitan Transportation Authority but I would like to see these things improved.	<p>We do have the ambassador program. The ambassadors are not law enforcement. They are there to help direct customers, answer questions about the system. We do have transit security officers and we have contracted police department support through LAPD, LA Sheriff's Dept, and LBPD. Metro is considering developing our own internal police department.</p> <p>I would encourage you to continue to make those comments. We have a Public Safety Advisory Committee that meets monthly.</p> <p>You mentioned station amenities. We would love to put station amenities on every bus stop, but we do not own the bus stops. We only own the bus stop sign. The cities are in charge of the bus stops themselves. Some cities have invested in improvements. We are going to be giving cities an opportunities to grab onto funding for those improvements.</p> <p>I do want to acknowledge that as part of our comment log, we are going to make sure the safety and operations team gets this feedback.</p>
Paramount Community Meeting	Abril Villa	Compton Resident	03/13/24	I live really close to the train. I picked the wrong city. Has anybody read the Compton State Audit? We are the worst city. Compton Creek Bike Path has received funding three times but they used the money for the general fund. Where is the money going? Who is investigating and having oversight on these entities? We have talked to Maxine Waters, we have talked to Supervisor Holly Mitchell. I feel betrayed by the system that we keep investing into projects that are not being followed through on. So funding is just taken away with no oversight. I am more than happy to send the Audit to you.	<p>Every city receives money through Metro for local funding. We have mechanisms where if we get burned on something, there is going to be repercussions. We have to get a lot of funding from a lot of agencies to keep Metro going. We have a reputation that we have to maintain and we are going to bring your warning in house.</p> <p>Typically when there is a grant given to a city or municipality, there is a time limit. So sometimes money is given back when it is not spent in time.</p>
Paramount Community Meeting	Isabel Viera	Buena Park Resident	03/13/24	I was wondering about the investment percentages, especially pertaining to freeway projects.	This is the initial investment. When you go through the different modes, this is the breakdown for each one. The \$40 million is funding we are using to set up 15 community programs that have been identified thanks to input from community members. We can't use transportation funds for anything other than transportation, but we can use the \$40 million dollars to help set up the community programs and get them going.
Paramount Community Meeting	Isabel Viera	Buena Park Resident	03/13/24	I live right next to a main street and I like that you guys are going to work on electrifying a lot of transportation. But what I don't understand, is if you all are expanding the freeway or not.	There is no expansion. There are several projects that deal with issues on the freeway. We are not trying to add lanes, we are trying to create safety improvements. We have data that shows the crashes and accidents at these locations is far higher than the state average. We are also aiming at investing in the bridges on the freeway. People don't safe crossing the freeway, walking across these bridges.
Paramount Community Meeting	Isabel Viera	Buena Park Resident	03/13/24	Can you clarify about the safety design of the freeway bridges?	This is my opinion, the original design of the bridges were to get cars on and off the freeway, they weren't designed with pedestrians in mind. So we now have to figure out how to make those bridges safer, to improve them for pedestrians. How do you expand access to the bridges and interchanges for pedestrians to make them safer.

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Paramount Community Meeting	Isabel Viera	Buena Park Resident	03/13/24	I don't think I am understanding. So you are trying to make the freeway safer for communities right? But either way, the freeway is still going to cause greenhouse gases. So why are you putting so much money into safety when the greenhouse gases issue needs a lot of support?	<p>If there's an accident at these interchanges/bridges, it causes a lot of backup. What happens then is that those cars and trucks will find another route. And that route is usually major streets like Garfield and Atlantic. So the major arterial roadways become bogged down. If the freeway isn't working well because of safety concerns, the impacts trickle down into local roads and into other issues. Because the freeway hasn't been improved in 60 years, the safety issues have only gotten worse over time. We have not heard about a single ramp where there is not an issue. There's issues all along the way.</p> <p>Coming onto the freeway, you only have so much space. So conflict happens, people get scared, they get aggravated, and accidents happen. If you make the on-ramp a little longer, it makes it safer to get onto the freeway and reduces conflict.</p>
Paramount Community Meeting	South Gate Resident, CBE member	South Gate Resident, CBE member	03/13/24	My main concern is about emissions. Emissions take a toll on a range of health issues. I spoke with my biology teacher and she said in the 1960s kids didn't have many health problems, it was safe to play outside. But in my generation a lot of kids have asthma problems. I appreciate how you guys are pushing for zero emissions. I notice how you guys focus on the funding, but I was curious about the quota for how much emissions you want to reduce?	Metro is committed to transitioning every single bus Metro operates to ZE by 2025. There will be a 100% shift. We are laser-focused on that. The state is mandating entirely zero-emission by 2035. Greenhouse gas emissions affect the region. By focusing on zero emission trucks, zero emission buses, and working with cities to implement charging stations we are trying to combat greenhouse gases. Another issue is particulate matter. If you had every single car and truck on the freeway zero-emission, there would still be a lot of particulate matter. Anyone who lives near the freeway is left to deal with the particulate matter which can go into a person's lungs and cause health issues. We have other partners. The Ports have to do their jobs, they are trying very hard to go zero-emissions. Every community has been affected by these issues, and that is what we are trying to respond to.
Paramount Community Meeting	Irma Lopez	CLC, Cudahy	03/13/24	What budget does public health fall into?	Metro does not have a traditional public health budget so there's 2 ways we are investing in that. One is that by the nature of our investments, we are improving safety which improves health. Secondly, we have \$40 million that we are using to set up different programs. One of them is the "Community Health Benefit" program. For example, we have had some success with better air filtration in homes. Metro can't fund that with these dollars directly, but working with partners we can get grants and connect those dollars to the communities directly. We are also looking at air quality monitors. There are some places that are having a lot of issues, but we don't have all the data that we need.
Paramount Community Meeting	Marisol Salgado	CBE	03/13/24	I'm a bus rider. Every day people smoke, and secondhand smoke is more harmful. They should put smoke detectors on the buses.	
Paramount Community Meeting	Marisol Salgado	CBE	03/13/24	They should train drivers to treat passengers kindly.	
Paramount Community Meeting	Yecenia Lopez	N/A	03/13/24	Security in the bus is needed. There is a lot of contamination in the City of Bell.	
Paramount Community Meeting	Anonymous Attendee	N/A	03/13/24	Is there going to be 24 hour bus transportation? Is Alameda Corridor going to be fixed?	

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Paramount Community Meeting	Isabel Villela Mancillas	CBE	03/13/24	Why is a large portion of the funding going towards the freeway instead of other subcategories that aren't as funded? I feel as if you didn't answer my question and rambled.	<p>The initial investments include a package of 12 operational safety improvements that will be assessed once the Task Force and Metro Board approve the Plan. Other truck safety weaving pattern improvements will be evaluated at that time for induced demand and increases in VMT.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>Multimodal- Improve freeway overcrossings so that they provide multimodal benefits and "reconnect LB-ELA Corridor communities" separated by the freeway and river – safer pedestrian/bicycle crossings, improved reliability and effectiveness of bus/transit, improved arterial traffic flow to reduce accidents and pedestrian/bicycle conflicts</p> <p>Operational Safety-focused auxiliary lanes that provide transition zones for cars and trucks to more safely merge on and off the freeway at locations with greater numbers of accidents than a simple ramp design can address: Safety for residents/users at local access points</p> <p>Safety- Provide safer conditions for all users of the freeway and local interchanges, especially community members accessing the freeway. Reduced conflicts for cars and trucks getting on and off the freeway: improved on and off ramps, transition zones, turn radius, traffic signal controls.</p> <p>Access - Greater access to bus service, pedestrian/bicycle paths, and personal mobility leading to greater access to communities, education, healthcare, and other economic opportunities. Safer local access to the freeway system.</p>
<b>Virtual Meetings</b>					
<b>Virtual Meeting #1</b>					
Virtual Meeting #1	Anonymous Attendee		02/01/24	Are there appendices that explain the projects more in-depth? For example, I can only find three listings of the Humphreys Pedestrian Bridge? Is there more of an explanation for this project?	<p><a href="https://www.dropbox.com/sh/gwjsyur2i0o4q9/AADIAw2pteXm93ozlDTq150a/710%20Task%20Force%20Meetings/Task%20Force%20Meeting%20%2317%202.13.23?dl=0&amp;preview=Revised+Draft+Initial+List+V4+2.13.23+English+Clean.pdf&amp;subfolder_nav_tracking=1">Yes. You can review all project descriptions here https://www.dropbox.com/sh/gwjsyur2i0o4q9/AADIAw2pteXm93ozlDTq150a/710%20Task%20Force%20Meetings/Task%20Force%20Meeting%20%2317%202.13.23?dl=0&amp;preview=Revised+Draft+Initial+List+V4+2.13.23+English+Clean.pdf&amp;subfolder_nav_tracking=1</a></p>
Virtual Meeting #1	ELAC Attendee		02/01/24	Why isn't there security on Metro buses?	We deploy security & safety officers on buses, but not all. Have a multilayered security program that includes not only law enforcement but private security + ambassadors, deployed strategically based on needs.
Virtual Meeting #1	ELAC Attendee		02/01/24	There are security issues with lines #4 & #2 late at night	Noted & will inform the proper individuals
Virtual Meeting #1	Clara Solis	Resident of East LA	02/01/24	Will submit letter -- concerned they do not accept hydrogen as zero emissions source, could cause more pollution, zero emission should be electric only, preference for projects that benefit broader corridor rather than smaller areas, support PM projects, traffic controls on I710 freeway ramps, do not want to see hydrogen plans. Document is hard to follow, lots of projects are missing complete descriptions, hard to figure out exactly what is being proposed. Not fond of transit oriented community projects, feels they cause gentrification. Support affordable housing projects.	Appreciate feedback & participation.
Virtual Meeting #1	Jose Dennis Alabaso		02/01/24	Speaking of Public Transportation, is Phase 2 of the Eastside Transit Corridor going to extend its connection prior to the East Los Angeles (LA) - Long Beach Transportation Corridor?	Metro will attempt to ensure connections from eastside extension will integrate w ELA. Phase 2 is currently in planning & environmental review phase, does include plans for FLM connections that will help improve communities in the corridor between ELA & Whittier. Connections to train included.
Virtual Meeting #1	Anonymous Attendee		02/01/24	Is there a map that shows how much money is being proposed for geographic areas? That way we can see if money is being allocated equitably.	<p>Thank you for your suggestion. Currently, that type of map isn't in that plan, but the project team will take that into account for the final version. We appreciate your feedback!</p> <p>Looking at corridor through equity lens &amp; needs, Metro has standard for EFC, not per capita distribution, looking at areas of investment. Reality re available resources is there are communities without resources/opportunities/tech assistance to develop their own projects. Aware there will be gaps, trying to address them via projects/programs proposed &amp; projects that still need to be created. Investment plan is long term &amp; living document</p>
Virtual Meeting #1	Anonymous Attendee		02/01/24	Metro should commit to transportation electrification only. There are too many risks with hydrogen.	Appreciate feedback & taking hard look at all tech. Main issue is tech is focused on not creating more harm along corridor, not increase pollutants. Also dependent upon area of corridor in which the tech is implemented (i.e. ZET)
Virtual Meeting #1	Anonymous Attendee		02/01/24	Appreciate Metro and the team sharing all this information. Thanks	
Virtual Meeting #1	Anonymous Attendee		02/01/24	Can you put the story maps link in the Q&A. It is easier to copy here	<a href="https://storymaps.arcgis.com/stories/7eb920fa318246f9b76032ddae2b5621?cover=false%22">https://storymaps.arcgis.com/stories/7eb920fa318246f9b76032ddae2b5621?cover=false%22</a>

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Virtual Meeting #1	Anonymous Attendee		02/01/24	What is the plan regarding congestion pricing? Will a toll lane be installed along the I-710?	Project concept provided to us, currently no plans to add lane or do congestion pricing. Putting it in the modal program for future evaluations, may be some concept related to congestion pricing, but regardless it has to align w goals/vision to corridor, which has not been the case yet
Virtual Meeting #1	Anonymous Attendee		02/01/24	I do not support projects that will increase police and surveillance. More surveillance does not equal safety. It creates distrust between community and government	This plan does not invest in that concept, more of an operational issue
Virtual Meeting #1	Anonymous Attendee		02/01/24	Would Metro be taking the lead on those projects or individual Cities taking the lead in implementation phase? Thanks.	Depends, most projects given to us by cities to consider & would be implemented by cities. Metro lacks land use authority & thus cannot implement. Led by local jurisdictions, Metro may not even be eligible to apply for certain funding, so will need to work in coordination w partners. Important to have right funders, sponsors, etcetera
Virtual Meeting #1	Anonymous Attendee		02/01/24	Could you please share some of the next steps to implement the projects identified in the list shared earlier in the presentation? Thanks.	Public outreach period & meetings over the next 30 days.  Come to the Board, get approval, make the assesment clear project by project. Some of them may be ready to go, some may need more work/development. Idea is to launch all projects off right away even though they all have different implementation processes
Virtual Meeting #1	Joe Linton	Streetsblog LA	02/01/24	Do any projects involve eminent domain? Would any projects demolish homes or other buildings?	Operating under Board policy of zero to minimal ROW impacts. Projects selected here would fall within this policy. Need to ensure as they're further developed that this policy is upheld. Will be entering planning & development stage, which will bring relevant communities to the table wherever this is the case. There were projects eliminated from consideration that did not fit this criteria.
<b>Virtual Meeting #2</b>					
Virtual Meeting #2	Salvation Army Participant		02/03/24	If you see potholes fixed by local cities, we can work with them and identify who can get them fixed. If we are improving a roadway, that kind of improvement, and repairing as well. This is more of a city function to fix. Metro funding does support local road fixes	If you see potholes fixed by local cities, we can work with them and identify who can get them fixed. If we are improving a roadway, that kind of improvement, and repairing as well. This is more of a city function to fix. Metro funding does support local road fixes
Virtual Meeting #2	Faraz Aquil (Virtual Participant)		02/03/24	Does Transit service include increased frequencies of buses and trains? I live in Downey and use public transportation. Buses in Rancho Los Amigos don't have good bus and train frequency services.	We have full nature of fundings, bus stops. We have them reach out about specific line and get more information
Virtual Meeting #2	Sylvia Medina (ELAC)		02/03/24	Bus issues with drunk people on buses and bus drives not saying anything. Bus routes 115 and 60	Share you contact info and we can follow up with you. Sharing information to the right department.
Virtual Meeting #2	Coral Gonzales (Salvation Army)		02/03/24	I love my buses and experience blue line and people sell to patrons. This could be dangerous. Allowing them on the Blue line to sell isn't safe.	Metro is trying to improve this conduct and Metro deploys ambassadors to address the issues and provide additional eyes and ears on the ground to notify the appropriate teams out there to get them out there
Virtual Meeting #2	Jose Santana (Virtual Participant)		02/03/24	Follow up on safety on bus lines and trains. I see a lot of people drinking beer. Funds to increase safety measures and ensure folks that ride MTA units don't drink alcohol. Safety is what bus rides look for. Funds for the ports to implement zero emissions measures, ports have a lot of money and they can use their own resources to implements measures. Other communities can use these funds instead.	Funding for zero emissions – no funding will go to port property; funds will go to port property outside of the ports. Ports will play their own role. The purpose is not to subsidize the ports. There is a transit app to report things on trip experiences.
Virtual Meeting #2	Salvation Army Participant		02/03/24	If you spend all money for projects, will there be money to keep everything up? Is there going to be funding to maintain projects or will it crumble down?	Metro might not be building it directly. It's working with city to assist and work on maintenance. We help fund improvements and agreement is local city is responsible for upkeeping any projects. We have other fundings that can help upkeep roadways, curbs, or shelters and assist with the upkeep .
<b>Virtual Meeting #3</b>					
Virtual Meeting #3	Calvin Ford (Cabrillo High School Participant)		02/05/24	Does Metro plan to add rapid bus lines?	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Virtual Meeting #3	Mark Jolles		02/05/24	I am questioning whether it is an effective use of the publics' time to read powerpoints to them for such a long period of time. This may discourage people from participating. It seems to be a one way form of communication. Who determines how much time is allocated for one way communication and two-way public comment communication?	Thank you for your important feedback. Comments are being addressed here in the Q&A chat throughout the presentation and in the chat. Community members can also participate in public comment on the virtual call and at Cabrillo High School in a few minutes. However, we will take your feedback in consideration for future planning. Much appreciated!
Virtual Meeting #3	Anonymous		02/05/24	The presentation is redundant and repetitive. I really think it is more important to take public comment than use their time to repeat the same information for an hour or more and read slides to the public. Reading slides is not an effective way to engage the public.	Thank you for your feedback. We will take it into consideration for future planning.
Virtual Meeting #3	Chris Leon		02/05/24	While high-level planning vision statements and aspirational policies are valuable, they often lack tangible plans for improvement. What specific projects and actionable steps are aimed at improving upon our environments?	There is a number of projects that we are putting forward between active transportation, arterial and other projects that are being planned by cities. Other specific projects like freeway projects need more development, but we do have a strategic plan for specific projects that are ready now in the near term. There is a blend in project funding between these ready now projects and other that need more time to be properly planned out.
Virtual Meeting #3			02/05/24	Does Metro plan to add more rapid lines to their bus system?	During the planning of the next gen bus planning, Metro planned a variety of options that identified a set of different bus improvements and the study showed that the frequency of bus stops and we can send you a report that showed the highlights of it.
Virtual Meeting #3	Chris Leon		02/05/24	In what ways other ways are we engaging the community in the decision making process, to ensure that we are heard and truly incorporated?	In addition to these meetings, we are taking question and allowing stakeholders to email, text and express their comments/questions with us through our hub. We are hosting information booths and many other places where we can be in person to engage with the public on all question they may have about the project.
Virtual Meeting #3	Frantz Joseph		02/05/24	I'll leave my question / comment here - we know that expanding freeways just means that traffic grows to fill the space. Why aren't we putting more of the available money into adding more metro trains along the A line and improving right of way for those trains?	Four or Five years ago Metro improved the A line and there is also money set aside that the community will be able to see in our presentation that will go to improving different lines of transit. Funding is reserved in the traunch of money for modal program improvements and other different areas. Funding is also being looked at that's being proposed by Metrolink to help improve the quality and safety of train transportation throughout the corridor.
Virtual Meeting #3	Frantz Joseph		02/05/24	As well as adding more bike infrastructure along the LA River (lights, signage) and adding concrete barriers, parking protected bike lanes to the streets that feed that pathway.	Metro has a plan called "LA River Bike Path" that is in the planning phase that will improve the river from Downtown all the way too Vernon and there is currently detailed planning taking place at this time.  This project has its own pathway and we are going to help just provide supplemental support/funding to help make it safer as well for stakeholders in this corridor.
Virtual Meeting #3	Nancy Meza		02/05/24	I haven't seen any update on a plan for public bathrooms alongside public transporation improvements. Is there a public bathroom plan that accompanies transit improvement plans? As a bus rider, I need more build in bathroom infrastructure in Metro planning.	We are piloting various restrooms at different facilities and we currently have them called "The Throne" at different stations across the A & C line. As we get through this pilot program we will make sure to see how that goes in the first 6 months and see how it goes from there with Board Approval
Virtual Meeting #3	Nancy Meza		02/05/24	What are Metro's plans for implementing free fares for the bus? What plans does Metro have in place to ensure keeping what little green spaces we have along the 710 corridor and ensuring no displacement of people/ no demolishing of homes. That was a huge red flag from the last 710 project that was eventually terminated.	The previous plan we had "5C" caused displacement and we are here because that is not something we will allow for as per Metro board. We believe we have projects that we can implement that do not allow for this to occur and will have mitigation measures in place to ensure the least amount of displacement to no displacement will occur. We are trying to develop these projects to ensure that the scope will ensure that will not be an issue.  Free fairs are for students PRE-K too 12th grade and we have launched the GOPass program to provide free fairs to students and also the LIFE program providing low fairs for 20 rides per month.
Virtual Meeting #3	Mark Jolles		02/05/24	Do free fares mean less operational funding and result in less service or a reduction of service or bus frequencies?	Free fares will reduce revenue and this is the struggle of all of this.  These are part of the studies we are on-going going through the Metro side of things and until those are determined we cant determine it fully. Which is why we are in a pilot situation.
Virtual Meeting #3	Mark Jolles		02/05/24	Several areas throughout the nation have removed freeways through their communities. Have the local communities in this corridor been presented with those examples?	the reconnecting the cities plan that DOT is doing to look at the different opportunities too see what potential viable options are there. We are looking comprehensively at different options but by modify the freeway we need to look at the fact that these trucks and the potential movement of goods would then affect the local roads and create impacts.
Virtual Meeting #3	Mark Jolles		02/05/24	My question was misstated. The Alameda Corridor has adequate capacity to handle the freight volume was the community provided with that alternative	The alameda capacity has some capacity too move that forward and that it is underused but it is not designed to take on all truck traffic and frankly will not be able too move it because of the connection needed too the ports
Virtual Meeting #3	Mark Jolles		02/05/24	I want to read a quote from a book on MIT "....." we need to go to higher level engineering skills to remove these roads because of its impact to other areas.	The context of this effort was rooting in discriminatory process that were taking place in these areas and we understand that this is specific. we will take into consideration all people for discussion but there is no decision being made too remove the freeway due to impacts on local roadways.

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Virtual Meeting #3	Anonymous		02/05/24	If you can provide me with the forecasted volumes on the interstates and arterials, what areas will be short of capacity, I can suggest where to move the volumes and increase overall capacity long-term and how to fund the changes. That would allow removing I-710 as an interstate and dramatically increase economic activity in the adjacent communities. My understanding is that the economic benefit is the basis of federal transportation policy.	
<b>Virtual Meeting #4</b>					
Virtual Meeting #4	Tony Torres	Resident of Downey	02/13/24	Written on comment card: "Presentation was detailed and informative and gave me a clear idea of the possible projects. I wish there was an electrified freeway lane that would charge EV while using/driving on that lane. We need light rail from Long Beach to Downey."	this was written on a comment card, so no response
Virtual Meeting #4	Mark Jolles		02/13/24	What percentage of freight on I-710 is local and what percentage is not local?	
Virtual Meeting #4	Avery Cervantes		02/13/24	Are more granular breakdowns of project costs available?	Projects listed are those received from sponsor agencies, associated w project readiness, so have more specific costs. We have scoped costs as we have received them. More detailed costs breakdown prob won't be in the plan. But can be provided upon request.
Virtual Meeting #4	Avery Cervantes		02/13/24	Also: how will Metro ensure transparency in regards to clean energy funding? How can we be sure the money will not be going toward non-solutions like carbon credits?	Commitment is to ZE tech. Looking at infrastructure, funding needs to go to that, not policy or carbon credits. Have a working group looking at ZE tech, to ID infrastructures that support ZE. Working w railroads & ports to see if they can switch to ZE tech.
Virtual Meeting #4	Amber R		02/13/24	Can you define what are auxiliary lanes? Why are these projects receiving a lot of money?	Metro looking at ramp extenders on/off freeway in only 2 locations. Only these 2 would not have property impacts. Extend time frame & distance you have to safely enter/exit freeways. For safety purposes. Goal is improving safety & performances of freeways
Virtual Meeting #4	Amber R		02/13/24	Extending "time and frame" sounds like expansion of freeways.	No widening of the freeway, which is off the table. Entirely safety focus
Virtual Meeting #4	Amber R		02/13/24	You said extenders, does that mean expansion of the freeway?	
Virtual Meeting #4	Mark Jolles		02/13/24	What analysis was done to preclude freeway removal as an option? Is that analysis available for review?	Freeway removal is not necessarily something we started w but Caltrans & Metro can review; freeways important to connect communities & goods movement. Impact of freeway removal would be major & heavy on arterials. No real Board direction to investigate removal of 710 as an option
Virtual Meeting #4	Mark Jolles		02/13/24	Was the community informed of the decision to preclude freeway removal as an option?	
Virtual Meeting #4	Mark Jolles		02/13/24	What system analysis was done? last meeting I think you stated that Supervisor Hahn specifically asked about the possibility.	
Virtual Meeting #4	Mario Dominguez		02/13/24	South Gate resident - I have left voicemails on Michael's line, but not heard back. I want to know, back in 2022 I took part in a Zoom meeting with engineer Gladys Dennis. Highlighted 2 potential projects, mini bridges. Rio Hondo being one & other connect two sides of Western & Eastern levy walls of the LA River. Bridges that go over the LA river in various South Gate communities all connect to 710. Crossing over the LA River over these roadways -- LA County has not done anything to build pedestrian bridges in South LA. All bridges are built to accommodate cars, not people. I want to speak to Ernesto Chaves regarding the I710 Corridor Bikeway Path. Would like his contact information. Is Metro interested in funding parks or development of parks? Asking re Parque Los Rios on Imperial Hwy & soil remediation.	Will find out who runs the I710 Corridor Bikeway Path & will contact him to provide him the info  Public health program also available re soil contamination. Setting up programs for it. Place they can investigate how to bring funding to address it
Virtual Meeting #4	Jamila Cervantes	CLC	02/13/24	Hi Metro team! :) Nice to see everyone. Can you remind me how community feedback (that isn't provided by the Community Leadership Committee but rather through the StoryMap/Dashboard) is going to be used? E.g., will this feedback be presented to the Task Force/Community Leadership Committee or will it be directly presented to Metro Board, etc?	Taking log of all input received & responses & identifying what the action is e.g. revision to plan? is it feasible? Will think about how to include it, will meet w CLC twice, by 2nd meeting we can provide up to date comments. Intent is to have it compiled & provide to TF & then Board
Virtual Meeting #4	Anonymous		02/13/24	Why aren't there any Class 4 bike lanes? That's the safest option. Which projects have class 4 bike lanes?	Heard protected bike lanes is much more desirable than shared lanes. Looking at opportunity to install those as part of Complete Streets programs. Projects received have been from cities. Will be under jurisdiction of local cities since Metro does not have jurisdiction over many of these. No projects delivered in the near term for these. Taking this back to ID how to do this/where/how?
Virtual Meeting #4	Anonymous		02/13/24	This is all great but is there going to be more security for the people including the disabled and seniors? As of now, with homeless and vendors there is no safety for riders, and now you're including walkers	Investment & infrastructure is what Metro handles. Would have to approach this thru the other side of Metro that handles operations, security, & safety for passengers at the system. Trying to provide safety through infrastructure & design through the CMIP
Virtual Meeting #4	Anonymous		02/13/24	How is hydrogen zero emissions?	New tech, there are concerns. Focusing on tail pipe of vehicle when referencing ZE. Bigger picture re hydrogen & how we produce electricity. Burning fossil fuels in a way that's not purely ZE. Mandates to go to tech that focuses on tail pipe emissions be ZE & work their way up the chain to production & transmission of the energy, whether its on tracks or roadways. Want to look at it holistically. Something that is still being explored. Typically follow state/federal guidance. Not committing to any hydrogen investment as part of this plan
Virtual Meeting #4	Mark Jolles		02/13/24	How does electrification of trucks address particulate pollution such as tire, pavement, and break wear?	Particulate matter comes from both tail pipe & roadway. Have heard that even if every car on 710 was ZE, there will be PM generated. Those are impacts that can't be solved w just EVs. Metro wants to figure out how to address that & will look for right patterns to find the solutions to reduce the public health impact.
Virtual Meeting #4	Carlos Benavides		02/13/24	Safety -- W LA County Commission on Disabilities, at Rancho Los Amigos -- right now concerns are that some patients/people won't even go to the bus stops. More than just a police concern. A lot of people w Americans with Disabilities Act needs or seniors won't be able to enjoy it. Referring to both personal safety & infrastructure. Look into yellow plates with bumps.	Have in the plan on transit side to invest on improving shelter/curb access safety infrastructure. Trying to ID where is the most need for ADA infrastructure (curbs, crosswalks, signals, benches) Work w cities & grant funders to invest in those key locations. Access Services also member for TF & thought partner.
Virtual Meeting #4	Mark Jolles		02/13/24	Are maps of trip volumes for various alternatives included in any studies? Is that available for public review?	Plan has linked all studies they have depended on & included. Can be found in the plan.
Virtual Meeting #4	Mark Jolles		02/13/24	What expertise does Caltrans provide to analyze the alternative of freeway removal and mitigation of the impacts? My experience is that Caltrans does not have this expertise.	
Virtual Meeting #4	Mark Jolles		02/13/24	Would the review by Caltrans be objective?	
Virtual Meeting #4	Mark Jolles		02/13/24	My understanding is that the Alameda Corridor has four times the freight capacity of the existing freeway corridors. What are the bottlenecks to utilizing that capacity? What percentage of freight on I-710 is local and what percentage is not local?	Not an infrastructure problem. How to move more cargo by train instead of truck. Shippers determine how cargo moves, truck is usually better option for them since it can be cheaper & further reaching than trains. How can they help shift this balance to trains instead of trucks. How can they be provided an incentive?
Virtual Meeting #4	Maria Teresa Contreras		02/13/24	It would be very important for there to be a security officer on each bus.	Recognize that is an issue, have heard it before & will approach Metro operations team to address. There are limitations on what can/cannot be done. Will pass this along to the right people.
<b>Virtual Meeting #5</b>					

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Virtual Meeting #5	Anonymous		03/15/24	I would like to ask Mr. Cano about the potential investment of 15 million about the project regarding the LA River bike path going to Long Beach. I use it on the weekends but sometimes you need to come back later to get past the traffic but it is not safe when it is that late and the lighting is horrible. If you go to the City of Glendale they have much better lighting for the bike paths and I would hope some of that money could be investment into improving the lighting.	We are looking at the LA River Bike Path and Metro is looking to work with partners to go into completing this project. Safety and lighting features are incredibly important. We need to work with LA County and figure out what the right answer is to the question. Thank you!
Virtual Meeting #5	Xavier Arambula		03/15/24	Are you coordinating the goals on this project with the ones Metro is doing with the First Last Mile program on the E Line Second Phase project? Will there be coordination with the Gateway Cities project as well? Thanks.	Coordination is incredibly important in this process and working with different agencies and council members of the cities we are working with regarding these projects. Those are programs we are coordinating with and we have a great relationship with GCCOG where we are working with them to ensure that our plans are connected to identify the priorities to ensure all of our work connects with no issues. We want to hear where there are potential issues from your feedback to make sure we connect all the dots.
Virtual Meeting #5	Mario Dominguez		03/15/24	Regarding the project website, I would like to see if we could see information on each project's timeline from development to implementation and where each project is to understand their status.	We have a lot of projects in the design and development and some in the development phase where we can get into construction quickly in an appropriate manner. We can provide the range of these dates across these projects and I think at the very least we can provide ranges. Based on each projects scope there are a variety of different timelines.
Virtual Meeting #5	Mario Dominguez		03/15/24	Regarding funding, when will all of that \$433 million dollars of funding kick in and how much does Metro currently have to use?	We have 243 Million currently in hand from Measure R that we have sitting from 16 years ago. Measure M is 500 million available and that 500 million is divided in 2 pots of funding. One part is available in July of 2025 and one part is available in 2031.
Virtual Meeting #5	Mario Dominguez		03/15/24	Western Levy Bike Path, Compton Blvd Bike Path and Terminal Island to Rio Bike Path are 3 projects I would like to see implemented in the list of potential projects. The LA River has been neglected for so many years and I think we need to use these funds to not waste our opportunity to implement these bike paths appropriately.	We are looking into those projects and will explore if we can implement these.
Virtual Meeting #5	Mario Dominguez		03/15/24	Also regarding art, are you open to taking on art projects? I would love to see these cities in the corridor	That's a great idea and we can work on potentially implementing your idea on this.
Virtual Meeting #5	Mario Dominguez		03/15/24	When will we see some of these projects be implemented?	As soon as possible and after the 5C project died we needed to rethink these projects and programs holistically and we needed to work on these projects before we can worry about developing them. Some projects based on their scope and magnitude will take longer than others but we are working tirelessly to ensure all of these projects get fully implemented.
Virtual Meeting #5	Xavier Arambula		03/15/24	Will this project coordinate with the LA River project that is focused more on the Northern end of the river?	We are working on all ends of this project to ensure all areas of the project are covered.
Virtual Meeting #5	Maria Teresa		03/15/24	I think I heard that they were also going to focus on housing. I think that's good. It should be noted that Los Angeles and its surroundings are suffering a lot during these times.	We are looking at housing strategically with the cities and communities that have the ROW and we have heard the need. It is all connected and we are looking at these issues to ensure that as we working on making investments in these areas that we do not cause anti displacement.
Virtual Meeting #5	Irma Lopez		03/15/24	I have a comment from some of the community members that couldn't join us and I wanted to talk about using scooters to reduce emissions. We want to use these in an electric capacity strategically in places along the I-710 to implement this.	That is an interesting point, typically you hear this need for bicycles regarding active transportation. We can work with cities on this type of mobility option with these electric scooters. We can potentially ask to partner with the cities to work on a grant to ensure that they have the capacity to add these in their cities infrastructure but in terms of general usage we need to work on the partnership with these cities to make it work properly and effectively.
Virtual Meeting #5	Elizabeth Analco		03/15/24	I wanted to talk about improving public transportation by increasing bus infrastructure and improving this around the Alameda Corridor. I saw that public transportation is available but why are you prioritizing these freeway projects over these transit opportunities when a lot of people still need to use the bus.	First and foremost, from a transit perspective to work with local partners to work on developing the proper infrastructure. We can't use the funding for operations of these buses and this funding is used for the development for projects. We are working on strategic plans for service gaps and infrastructure operation improvements. We hear you and will bring forth this issue. We would like you to share that information with us so we better understand your needs to improve the quality of the service. We are working on using 70% of our funding to improve the other areas of need in the corridor that are not tied to the freeway. We need to look at this as a holistic investment in ALL MODES not just freeways.
Virtual Meeting #5	Elizabeth Analco		03/15/24	Do you have a plan to upload the map of the arterial roadways like a Google Earth imaging of where the roads are being improved to ensure there is no demolition ?	We will have our team create that and we will ensure all our project work will not allow for any displacement and we will work with the community to develop that trust and accountability with the community to ensure that doesn't happen. We will add maps to include sensitive receptors and not conflict any important facilities. By working and hearing from the community we will ensure that we are doing right by the community
Virtual Meeting #5	Nicole Vera		03/15/24	I have suffered from asthma as long as I can remember and this plan doesn't realize the environmental impact and I am concerned about the health consequences this will bring.	A lot of your points aren't accurate with this statement. We are responding to this plan with community health at the forefront of this plan. Working with CLC and CBE and I want to ensure you understand we are providing a better health future that have suffered from these issues you stated.
Virtual Meeting #5	Anonymous		03/15/24	Installing second hand smoke and smoke detection systems. Also adding a texting number to talk with these operations to text with operations leads to ensure the safety.	In terms of code of conduct we are doing a concerted effort to ensure that there is no smoking on any busses. We will work with the board to potentially implement metros own police authority. Using the transit watch app as well will be the best way to connect with the right people in terms of operations to keep the safety and well being of the riders at the forefront. We have also implemented HVAC systems in the fleets to have these issues not arise.
Virtual Meeting #5	Mario Dominguez		03/15/24	Excellent summary by Mr. Cano of Metro's mission. Now they need to get to work and start implementing these projects we all have been dreaming about.	
<b>Dashboard Feedback</b>					
Dashboard	Connie	N/A	01/31/24	This would be an amazing project.	
Dashboard	Connie Tavaréz	N/A	01/31/24	I would use it all the time.	
Dashboard	Tristen Miller	N/A	01/31/24	Please, make this happen. Metrolink to Long Beach would be a game changer. Even just to the airport,	
Dashboard	alex standke	N/A	01/31/24	I would cry tears of joy if you do this.	
Dashboard	alex standke	N/A	01/31/24	Daisy should be a continuous bike lane from Wardlow to 3rd.  All it needs is a signaled crossing at PCH, that's literally all, and it would be perfect. It has already received a lot of traffic calming and otherwise is a comfortable street for biking.  Magnolia is fast and dangerous. For a bike lane suitable for ages 8 to 80, it needs completely protected bike lanes. A single crossing would be cheaper and better	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Dashboard	Joshua Kayn	N/A	02/01/24	I am a resident of the DTLA/Boyle Heights area and work in Long Beach. I have tried taking the A line to work several times, but it's very impractical for me for that journey because it is significantly slower than the freeway, even in rush hour, and there's a significant bike ride or walk at both ends. This solution would be perfect for me to have a truly competitive transit option. I strongly support this option. I suggest marketing it as an "A line express," in the same way that more developed regional subways have parallel routes. It's important to prioritize minimizing the number of stops but ensuring there are excellent multimodal connections at the stops (for example, to the A line and east-west options).	
Dashboard	Joshua Kayn	N/A	02/01/24	I support this.	
Dashboard	Joshua Kayn	N/A	02/01/24	I strongly support the investment in the West Santa Ana Branch Transit Project	
Dashboard	Joshua Kayn	N/A	02/01/24	This seems misguided, and I do not support it. It's likely to provoke the ire of car lovers while also diverting money from the much more important project of getting more people and freight onto the railway.	
Dashboard	Joshua Kayn	N/A	02/01/24	I strongly support this. It will be immensely beneficial to have a contiguous corridor that is friendly for traveling in ways other than by car. It will be important to ensure that highway crossings are not neglected. There must be protection for pedestrians and cyclists throughout the route.	
Dashboard	Joshua Kayn	N/A	02/01/24	I strongly support these projects. These would allow me to travel to work safely in conjunction with transit. It will be critically important to enforce safety measures on this route, for example, enforcing road safety violations especially against pedestrians and cyclists.	
Dashboard	Camden	N/A	02/01/24	A Metrolink line to Long Beach would be an excellent expansion for the regional rail system, especially if it interconnected with the Antelope Valley line. This project would improve capacity and travel time to Long Beach from Downtown LA and would also be a great first step towards regional electric rail. Please fund this project and build an overhead electric rail line to Long Beach, expanding transit options for all of LA!	<p>In 2021, the Metro Board approved Motions 47 and 48 which effectively ceased further work to advance the 710 South Corridor Project EIR/EIS.</p> <p>To ensure Metro's investments do not disproportionately impact communities of color, inadvertently worsen induced demand, or work against existing greenhouse gas emissions reduction goals. The new process was designed to undertake a holistic equity-based project examination. Our assessment process looked at induced demand for automobile trips based on their potential for VMT Increases this would occur through induced demand for car trips and all projects were evaluated based on this metric. Please see Concern 9 "Potential for VMT Increases" in the Investment Plan.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>The proposed freeway improvements are aligned with the vision, goals and principles adopted by the LB-ELA Task Force and existing Metro Board Policy. This is illustrated below in what we are considering and not considering:</p> <p>What the Investment Plan Proposes Includes:</p> <ul style="list-style-type: none"> <li>•I-710 Mainline (Safety and Operational improvements)</li> <li>•Local Interchanges/Overcrossings (MOSAIC Partial Freeway Interchanges)</li> <li>•Technology</li> </ul> <p>What the Investment Plan Does Not Include Is:</p> <ul style="list-style-type: none"> <li>•Freeway widening</li> <li>•Full freeway to freeway interchanges</li> <li>•General purpose lanes</li> <li>•Concepts with displacements</li> </ul>
Dashboard	Jackie Espinoza	N/A	02/08/24	The Carlin & Bullis street is a 3 way street. There needs to be more time added to allow students that attend Lynwood High School to walk to the end of the corner, so they don't get stuck, perhaps more than a signal upgrade.	
Dashboard	Angie Ku		02/08/24	Elm and Martin Luther King is important due to students walking by here during morning and later in the day. The lack of traffic signals makes it difficult to cross due to cars not stopping.	
Dashboard	Kurt Canfield		02/13/24	This project would be transformative for the region. Long Beach is the second largest city in Los Angeles and is linked via light rail to Downtown LA. A higher speed, higher capacity regional rail connection would allow Long Beach residents a much faster trip to Downtown LA and all of the regional connectivity available at LA Union, including eventually California High Speed Rail.	
Dashboard	Erin Hoops		02/13/24	It looks like PCH is getting torn up for this. When you put it back, please follow complete streets!	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Dashboard	Marcos		02/16/24	This project should create a stronger connection to the westside for pedestrians, and car owners (not trucks). Currently 9th street acts as a connection to the existing Shoemaker Bridge. A lot of pedestrians use this bridge even though its a freeway. This project needs to ensure the connection and safety of other users. Per the Environmental Impact Report - it's not clear if the project would include those connections.	
Dashboard	Brandon Lampert		02/17/24	I live in Downtown Long Beach and support this project. I prefer the option of exclusively using overhead catenary wire to power the trains since they have been used in rail systems around the world for over 100 years and are a mature technology. I am against using lithium batteries or hydrogen systems since they are less energy efficient, and take up more space and mass on the trains. Since the trains on this line would be in use for decades they need to use a technology that will be supported for decades. Having this line will make access to California High Speed Rail much more convenient for the people living and working near this new Metrolink line. This line needs to take less time to travel between Los Angeles Union Station and Downtown Long Beach than the Metro A line. This line also needs to have a shorter travel time than driving on the Freeway with minimal traffic between Downtown Long Beach and Los Angeles Union Station. Also, this line needs high density development at every station.	
Dashboard			02/17/24	I do not support this project using batteries. This project needs to use a catenary wire system. Producing and disposing of batteries is harmful to the environment. Batteries will also increase the weight of the trains compared to a catenary wire system which will require more energy to move the trains.	
Dashboard	Brandon Lampert		02/17/24	I live in Downtown Long Beach and some days there is a layer of soot over everything. An emissions reduction at the port would be a great improvement.	
Dashboard	Brandon Lampert		02/17/24	The merge between I-710 NB and I-405 NB is challenging at the part where traffic also merges from I-405 NB to I-710 SB. The merge between I-405 SB and I-710 SB is challenging at the part where traffic also merges from I-710 SB to I-405 SB.	
Dashboard	marcos		02/21/24	A protected bike lane with proper barriers is important to actually get people riding their bikes and feeling safe on a high capacity corridor. This project should include protected barriers	
Dashboard	marcos		02/21/24	A protected bike lane with proper barrier is important to actually get people riding their bikes and feeling safe on a high capacity corridor. This project should include protected barriers	
Dashboard	marcos		02/21/24	Ensuring this bridge is wide, well lit and maintained is important to get people to use it.	
Dashboard	Anonymous		02/21/24	Needs more landscape and bike rackes next to willow springs park	
Dashboard	Anonymous		02/21/24	More landscape is needed	
Dashboard	Anonymous		02/21/24	Protected bike lanes are important and critical to this project	
Dashboard	Anonymous		02/21/24	This needs to happen sooner !	
<b>Small Group Meeting</b>					
Freight Industry Small Group Meeting	Sharon Weissman	POLB	02/13/24	There is a Port of Los Angeles project included under initial planning. Please provide clarification on modal programs. le ZET Lane, Congestion pricing.	This is where projects are parked. They need to be further analyzed. Port projects if they are built they will be funded by the ports. This is a multipurpose space. We pulled not popular Tier 1 projects here. Some of these will not be funded/supported by Metro. FRATIS--Should be ICM. Modal Program-goods movement focused discussion group-discuss which projects should move forward. A couple of years from now-we will let board know that stakeholders support certain projects. Our focus is on initial projects.
Freight Industry Small Group Meeting	Sharon Weissman	POLB		Of the projects in 5C, not including widening an major freeway to freeway interchange, what projects are NOT included for initial investment?	2 partials-we hope they wont have ROW impacts. All will be included in initial investment. They all need to be reviewed - alternatives analysis will let us know which ones move to environmental. CEQA/NEPA will be required.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		Freight Rail - please change to Zero-Emission. We are working with Air Quality Management District. Long Beach is working on battery electric, fuel cell. Freight Rail study-we will be involved. What is your strategy for next steps on the mainline projects on the list?	Funding for Alternatives Analysis and Environmental Review; funding for implementation for projects that rise to the top from alternative analysis.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		Alternative Analysis connotes redoing the study.	CT want PAED. Allows us to do engagement work to get buy in to move this forward. More of a loose term - Feasibility analysis.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		That would be funding for all mainline projects?	concurrent advancement of modes.

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		Have you identified what you will seek for Mega? I mean pre-construction. Mega is coming up soon. You'll consider Mega, TCEP. You'll have challenge of analyzing these as a whole. Environmental Protection Agency would be required to do this.	Board policy actions required. TCEP is also coming up. Commitment to NEPA/CEQA. The aux lanes will be connected to an interchange. This is a pipeline. We will fund projects through this plan. Priority INFRA, etc.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		What is West Santa Ana Branch bikeway? We are doing real estate with UP and Metro. We have approved Memorandum of Understanding to negotiate with you. Wouldn't your non motorized planners know about this? ATP Team. We could be killing that project.	<p>Follow up from M. Cano via 2/16 email: Kerry: Some background and an update:</p> <p>Background:</p> <p>The City of Paramount has prioritized this project. It rated highly in the CMIP because it would close the existing gap between the LA River bike path and the San Gabriel River bike path via its connection to the Bellflower Southeast Gateway LRT bike path constructed in 2009 and the adjacent Phase 1 of the Paramount segment of the Southeast Gateway LRT bike path, constructed in 2013.</p> <p>Update:</p> <p>While the main pathway for this proposed bike path is not on UPRR ROW, a proposed path would cross the spur line tracks with a protected crossing. We understand that UPRR has not agreed to this protected crossing and is in ongoing discussions with the City of Paramount. We also understand that if an at-grade crossing is not going to work, then a grade-separated path would be pursued if funding was available.</p> <p>We can make sure the CMIP reflects that these discussions are ongoing and that we recommend initial funding, with an amount contingent on UP and POLA/POLB approval of an at-grade crossing. CMIP funding would then cover the funding shortfall to move the project to implementation.</p> <p>If no at-grade crossing agreement can be reached, the CMIP would provide this funding toward the added cost of constructing the bike/ped overcrossing of the rail tracks, with the City of Paramount responsible for obtaining the balance of the funds, with support from Metro to secure grants, etc.</p> <p>This approach would ensure the CMIP funding goes to an approved concept, allowing UPRR, POLA/POLB, and the City of Paramount to negotiate a resolution. We will not fully fund a grade-separated bike/ped pathway, as we need to leverage CMIP funds for a project of that expense.</p> <p>I hope this is helpful — we didn't have the correct information previously. I am happy to discuss next week — I hope you enjoy your weekend.</p>
Freight Industry Small Group Meeting	Teresa Dao-Ngo	POLB		I appreciate the comprehensiveness of the document. P 247. Modal programs-parking lot. But there is funding for modal programs. But for freeway projects - congestion pricing. Why is there \$49M there and not with initial investment projects.	<p>Modal Program - Tier 1 project not selected. To see if it will be implemented. Tier 2 projects-need to be re-examined. New projects-a place to evaluate. Then Planning Projects. Technical Assistance/Equity Pots of funds. There is a cash flow consideration. There's only so much funding needed for AA/Environ. When you get to implementation, we cant touch them until 2026, 2032 when additional measure funding available.</p> <p>\$49 m for modal program funding can be used for initial investment projects.</p>
Freight Industry Small Group Meeting	Sharon Weissman	POLB		Inconsistent re Blue Line and A Line. We need to fine you anytime Blue Line. Remove "all"	
Freight Industry Small Group Meeting	Sharon Weissman	POLB		Port of Long Beach - Metro will support. What does this mean?	Letter. POLA outside gateway cities boundary. We want to use this plan to show state/federal folks. Metro is all in. Ports can leverage the plan. Metro can provide Letter of support. ZE , modal shift and rail strategy - we would like to support. There is need in the corridor beyond what this plan can fund. \$17b topline number. If there are other projects - ports, rail, ac- projects with funding need to expand topline number. This the time to do this. We are not doing a metro silo. All projects as a need.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		Caltrans coordination?	Interested in community engagement like Florence project. They are worried they wont get support from Sacramento. CT and Metro have been working on this. Who's the staff lead going forward? Metro has trimmed down its freeway program. Our CEO would like to see CT take more ownership on this as owner of the facility.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		Freight TDM-I am working LA28-I told them that freight TDM is not viable. It's a long term aspiration?	Freight strategy is where we can do this. Efficient movement goods. How to use capacity we have. TDM would be part of that scope. Yes-long term. We will mention it.
Freight Industry Small Group Meeting	Jermaine Hampton	LAEDC		glad to see modernization on GM ecosystem, as well as other GME components. Glad to see this move forward. We are doing a deep dive-done with study at end of the month. Our sr. economist will do a presentation.	
Freight Industry Small Group Meeting	Jermaine Hampton	LAEDC		I'm glad we're here to discuss projects. We're watching this evolve. No specific comments relative to the proposal. Appreciate the convening of a small group. Michael I appreciate the efforts and Leadership. Sharon, Theresa thank you for being proactive. We are supporting our industry. We'll see where the chips fall.	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Freight Industry Small Group Meeting	Sue Dexter	METRANS		My sphere is clean goods movement. I'm glad many of the things we've discussed is in here. Infrastructure and placement of facilities, hydrogen -under 004, tied to 23. I'm interested to see how this will evolve. I would like to know more details. I have skimmed the report at best. It is very well put together. Easy to read. Easy to consume the content. This is very important for the wide range of audience. Its not written by viewpoint of people in this specific field.	ZET WG is where we will advance ZE Technologies discussion will continue.
Freight Industry Small Group Meeting	Louie Diaz	International Brotherhood of Teamsters, Local Union 848		Appreciates effort. Proud to be part of it. Wants to make sure this is a positive document for all communities throughout the region. I am elated. What you have put forth here. Looks like in March it will come through. It doesn't fall short of all goals we are trying to achieve. All the hours, the technical team, thank you for your leadership Michael. It couldn't have been done without you.	Letters of support will be appreciated. Committee on the 20th.
Freight Industry Small Group Meeting	Sharon Weissman	POLB		Is there anyone here that they can't vote yes. Can you be there on March 11?	
Freight Industry Small Group Meeting	Sharon Weissman	POLB		Is there a plan to redo the 405/710 connector? Plans to improve it?	We aren't there yet. This is an area where we need CT at the table. Boundaries we are hitting = we may have good ideas, but CT needs to support them. There's room for it, but not right now. It is still on the table. We have funding reserved - approaches, studies, something we all want to get behind it-we need to identify priority=advancing progress of the corridor. With CT we need to talk about the system. One of these is high priority ATRI.
Freight Industry Small Group Meeting	Matt Schrap	Harbor Trucking Association		Nationally speaking we have 60 at the 57 = top 10. Interestingly 710 didn't make it.	
Freight Industry Small Group Meeting	Chris Chavez	Coalition for Clean Air		Thank you Robert, Micheal, Avital and the Metro team for getting us to where we are at today. Thank you for meeting with us regarding public safety. That existing infrastructure is safe. I am glad to see how far we've come in making sure that funding will go to the mission of the plan, how we will improve existing infrastructure, modernizing onramps, making sure funding was there. I will be there on March 11th - I am putting this on members table. We have many members. We are inclined to support it. (Join us February 27)	Robert-if you need someone at a meeting. An overview presentation. We are available.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		Freight Electrification Project funding clarification. Hydrogen bus clarification.	Metro is more focused on if there is information needed on the implementation of hydrogen. There is a lot of fear mongering right now.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		You won't have Task Force in everything moving forward. You don't have to dance around semantics. You can dive in with Air Quality Management District project. CRISI grant-fuel cell locomotive. Hydrogen fuel cell on mainline locomotive - it will be a while. That will be the way to go when Tier IV locomotives lose their life.	We want to keep the door open. You are figuring things out. We don't want to predetermine anything.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		Reprogramming of STP/TMAC. Did you submit any projects.	Not sure. Will need to check with Staff.
Freight Industry Small Group Meeting	Kerry Cartwright	POLA		Timeline-clean truck. What's implementation timeline? I can help uplift this work.	We are working on it now. Board approved a while ago. We are also working on infrastructure LACI project. Currently in the works. We will add you to the ZET WG. There will be a dashboard with updates on projects.
Freight Industry Small Group Meeting	Jermaine Hampton	LAEDC		Jermaine Hampton Great work all truly appreciate the collaboration! like 2	
Email					

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Isaac Katz		01/31/24	<p>Dear Metro,</p> <p>I'm writing with concern about the Long Beach East LA corridor plans. As a Long Beach resident who commutes north along the corridor most weekdays, improving transportation in this region is critical to me. Because of the limited and slow public transit options, I am generally forced to drive traffic-choked streets and highways. This is bad for the environment, a frustratingly slow experience, and dangerous to boot (because car transportation is always dangerous).</p> <p>However, it appears Metro isn't acting with the proper urgency to improve transportation in the corridor. The Mobility Investment Plan appears to be crawling along with Task Forces and Working Groups and various other slowdowns. If Metro insists on continuing to spend years and years talking about what could happen, instead of just building public transit right away, it will lead to uncountable amounts of extra carbon emissions, unthinkable numbers of wasted hours in traffic, and unconscionable numbers of deaths from traffic violence.</p> <p>Stop talking. Start building.</p> <p>I hope to be able to regularly commute to work via public transit before too long. At Metro's current pace, I'm not optimistic.</p> <p>Thank you, Isaac Katz</p>	
Email	Philip Pongvarin		02/02/24	<p>Just voicing my opinion regarding the 710 Freeway project.</p> <p>As a resident of the City of Long Beach. I've been following the 710 freeway widening option and am for it.</p> <p>If Metro can introduce these auxiliary lanes on 710 similar to those on 405 freeway between Long Beach Blvd and Bellflower Blvd., I imagine that being beneficial to lessening traffic. Personally, it would also reduce the stress of merging into freeway speed right after entering from most of these short onramps.</p> <p>I'd also say the less amount of time cars are stuck idling in bumper to bumper traffic, the less pollution overall.</p>	<p>Thank you for your note! Yes we agree and appreciate your support.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>Multimodal Improve freeway overcrossings so that they provide multimodal benefits and "reconnect LB-ELA Corridor communities" separated by the freeway and river – safer pedestrian/bicycle crossings, improved reliability and effectiveness of bus/transit, improved arterial traffic flow to reduce accidents and pedestrian/bicycle conflicts</p> <p>Operational Safety-focused auxiliary lanes that provide transition zones for cars and trucks to more safely merge on and off the freeway at locations with greater numbers of accidents than a simple ramp design can address: Safety for residents/users at local access points</p> <p>Safety Provide safer conditions for all users of the freeway and local interchanges, especially community members accessing the freeway. Reduced conflicts for cars and trucks getting on and off the freeway: improved on and off ramps, transition zones, turn radius, traffic signal controls.</p> <p>Access Greater access to bus service, pedestrian/bicycle paths, and personal mobility leading to greater access to communities, education, healthcare, and other economic opportunities. Safer local access to the freeway system.</p>
Email	Joe Linton		02/02/24	Please send me a link to yesterday's 710 corridor presentation. Thanks.	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Joe Linton		02/02/24		<p>The proposed freeway improvements are aligned with the vision, goals and principles adopted by the LB-ELA Task Force and existing Metro Board Policy. This is illustrated below in what we are considering and not considering:</p> <p>What We Are Considering Include:</p> <ul style="list-style-type: none"> <li>•I-710 Mainline (Safety and Operational improvements)</li> <li>•Local Interchanges/Overcrossings and partial Freeway Interchanges</li> <li>•Technology</li> </ul> <p>What We Are NOT Considering</p> <ul style="list-style-type: none"> <li>•Freeway widening</li> <li>•Full freeway to freeway interchanges</li> <li>•General purpose lanes</li> <li>•Concepts with major displacements</li> </ul>
				To whom it may concern -Thank you to Metro for listening to the community and backing off of many of the worst harms in earlier	
Email	Faraz Aqi		02/03/24		Thank you for your comment. We have directed your inquiry to the appropriate department
				Hello again LA Metro, this is Faraz. I'm the person that asked the question regarding the frequency issue along the corridor, parti	
Email	John Delshadi		02/08/24	<p>Respectfully, the community is begging Metro to scrap plans to widen, add lanes to and continue investment into the 710 Freeway project. This money should be diverted to transit options in the area.</p> <p>Metro's own analysis put the areas around the 710 as communities already impacted disproportionately by freeways. Continuing to invest in car centric projects reinforces these inequities.</p> <p>The latest plans revealed by Metro are little improvement. Please, we urge you to think about options that put people and our environment first.</p> <p>Thank you,</p> <p>John Delshadi 949-636-4569</p>	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Stephen Krusel		02/08/24		<p>Thank you for your note. We appreciate your comments on the Investment Plan and your support for the A-line First/Last Mile improvements.</p> <p>You make the point that auxiliary lanes are argued to be ineffective. Upon approval of the Plan by the Metro Board, you will have an opportunity to make your case when the MOSAIC Program package of twelve potential freeway improvements is evaluated. Other issues like sightlines, pedestrian/cyclist crossings, and traffic flow will also be addressed at that time.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>Multimodal: Improve freeway overcrossings so that they provide multimodal benefits and "reconnect LB-ELA Corridor communities" separated by the freeway and river – safer pedestrian/bicycle crossings, improved reliability and effectiveness of bus/transit, improved arterial traffic flow to reduce accidents and pedestrian/bicycle conflicts</p> <p>Operational: Safety-focused auxiliary lanes that provide transition zones for cars and trucks to more safely merge on and off the freeway at locations with greater numbers of accidents than a simple ramp design can address: Safety for residents/users at local access points</p> <p>Safety: Provide safer conditions for all users of the freeway and local interchanges, especially community members accessing the freeway. Reduced conflicts for cars and trucks getting on and off the freeway: improved on and off ramps, transition zones, turn radius, traffic signal controls.</p> <p>Greater access to bus service, pedestrian/bicycle paths, and personal mobility leading to greater access to communities, education, healthcare, and other economic opportunities. Safer local access to the freeway system.</p> <p>We also appreciate your suggestions on opportunities for improvement with regard to transit. We agree providing better transit options could encourage more people to opt for alternatives like the A-Line instead of driving on I-710. You note that there is a lack of transit improvements on the east side of the study area. Your suggestions include implementing BRT or limited stop lines to connect the southeastern area to existing light rail and Metrolink stations.</p> <p>The Draft CMIP proposes 4 bus priority lane corridors:</p> <p>Atlantic Blvd, Florence Blvd, Long Beach Blvd, Slauson Ave (Draft CMIP)</p> <p>Metro proposes a greater commitment to transit by adding 4 more bus priority lane corridors from the modal program to the 4 identified in the Draft CMIP initial investment to create a bundle for evaluation, development and implementation: Whittier Blvd, Olympic Blvd, Gage Ave, and Firestone Blvd (Modal Programs)</p> <p>Shift money from the modal program to the initial investments in transit.  \$125M (to be leveraged to \$625M) to Transit projects:  Draft CMIP: \$29M in initial investments; \$96M in modal programs  Proposal: \$57M in initial investments; \$68M in modal programs</p>
Email	Justin J.		02/13/24	<p>Hello, My name is Steve Krusel and I wanted to give some feedback on the Long Beach-East Los Angeles Corridor Mobility Investment Plan. Widen the freeways! The ports handle billions in goods and create thousands of jobs. Build more infrastructure and get products moving. This reduces costs for millions of Americans. Car, rail, everything. Cars will be mostly EV soon.</p> <p>Offer a premium over market rate to buy homes and businesses in the way. It is not cute that someone can create millions in economic losses and job losses because they refuse to move down the street.</p> <p>Make new lanes CONGESTION PRICED. Dynamically charge for access to the lane based on volume. So the lane is always full but still averages 55mph 24/7</p> <p>WIN-WIN. More lanes for cars (because everyone wants to drive) and revenue for transit</p> <p>Thanks I know you cant please everyone ☹</p>	<p>This proposal is responsive to the request to provide a more complete and transformative investment in transit in the LB-ELA Corridor.</p>

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Mario Anderson		02/13/24	<p>To Whom It May Concern,</p> <p>I heard about these improvements and my feedback is that it is a great draft. I approve of projects to improve bike connectivity through Long Beach. I lived in and frequent these communities for recreation and family. My comments are as follows:</p> <p>Positive:  The Gateway Cities need secured bike parking and this plan includes it.  Atlantic, Alondra and Slauson would be a great bike boulevard for the entire region.  Reducing emissions by relying on more freight rail will reduce idling pollution and help truckers at the port.  Including bus frequency and A line first/last mile is a game changer that will help thousands of transit users.  These bus stop improvements, bus lanes and bike lanes along major corridors will link up well with the new SE Gateway Line.  Trolleybuses can also be considered for emissions reduction in transit.  Beautification and river path improvements will help people feel safer and consider active transport.</p> <p>Area for improvements:  Transit improvements are still missing a pivotal part: Artesia Station needs to be connected to Gateway Towne Center (shopping area next door) by existing walking and bus infrastructure. As of now Artesia is a great transit hub that is a one mile walk or a hard bike over a bridge from useful destinations. Artesia station has an accessible second exit fenced off that Metro has been considering opening again in previous projects over the years. Please include this in the mobility plan. Compton wants to, but more stakeholders pushing can make this station a regional hub and solve massive first/last mile struggles in Compton.  Rail electrification from the port should be with catenary lines as the tech is older and more reliable (e.g. the A line). Batteries are more a short term solution.  Thank you for your time and I hope these projects can proceed.</p> <p>Sincerely,  Mario "MJ" Anderson  UCLA   Class of 2020</p>	<p>Thank you for your comments and wonderful suggestions. They will be added to the Modal Programs through the Working Groups established once the Investment Plan is adopted by the Task Force and Metro Board. For more information, see Chapter 9 that describes more details about the structure of the Working Groups for the Modal Programs.</p>
	Mark Jolles		02/13/24	<p>Hi Michael,</p> <p>I commented at a recent 710 corridor meeting that it appears that the local community's wishes are inconsistent with maintaining I-710 as a freeway. I posted a comment and requested data to analyze how the trips could be reassigned to mitigate the removal of the I-710 as an interstate.</p> <p>Historical analysis suggests that removing an urban interstate has more economic benefit than keeping it. I inquired why the local community was not provided the option to remove I-710 to be analyzed like other alternatives. What analysis was performed to that end?</p> <p>My email was provided and I requested a list of study area trip volumes and forecasts necessary to do an analysis. So far there has not been a response. The posted request follows:</p> <p>*Gateway Comments If you can provide me with the forecasted volumes on the interstates and arterials, what areas will be short of capacity, I can suggest where to move the volumes and increase overall capacity long-term and how to fund the changes. That would allow removing I-710 as an interstate and dramatically increase economic activity in the adjacent communities. My understanding is that long term economic cost/benefit analysis is a basis of federal transportation support.*</p> <p>Thank you for the opportunity to comment at the meeting. I am looking forward to receiving the forecasted volumes for the involved corridors.</p> <p>Mark Jolles  310-242-0660  markjolles@gmail.com</p>	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Allen Natian	San Pedro Resident	02/24/24	<p>Hello Metro,</p> <p>I am a resident of Los Angeles city living in San Pedro and I frequent the 710 corridor a lot, mostly using the freeway.</p> <p>I am very glad that this project is progressing forward. However, I would like to caution anything that widens or "improves" freeways;</p> <p>We live in a time where we are reckoning with our past that prioritized car travel more than anything else. It has destroyed neighborhoods, worsened air quality, and contributed to global warming. We are well aware of the phenomenon known as Induced Demand and how freeway widening worsens traffic. We are also well aware that if alternative modes of transportation or available, we will take them; I would surmise that the majority of travel here is done by car not by choice but by necessity due to the built environment that we inherited.</p> <p>Therefore, I urge Metro, the board of directors, and any other stakeholders to think of the future and think twice whenever a project will induce car demand. These projects include, but are not limited to "auxiliary" lanes, and any sort of freeway widening. Those should not be initiated due to the aforementioned reasons. We should prioritize better modes of transportation, such as a bus rapid transit (BRT) line between Long Beach and East LA. We should also expand our protected bike lanes so people have a choice on how to get around.</p> <p>Let's build a cleaner, sustainable, and healthier future.</p> <p>-Allen Natian</p> <p>Resident of San Pedro</p>	<p>Dear Mr. Natian, thank you for your note and your concerns about the Investment Plan and induced demand.</p> <p>In 2021, the Metro Board approved Motions 47 and 48 which effectively ceased further work to advance the 710 South Corridor Project EIR/EIS.</p> <p>To ensure Metro's investments do not disproportionately impact communities of color, inadvertently worsen induced demand, or work against existing greenhouse gas emissions reduction goals. The new process was designed to undertake a holistic equity-based project examination. Our assessment process looked at induced demand for automobile trips based on their potential for VMT increases this would occur through induced demand for car trips and all projects were evaluated based on this metric. Please see Concern 9 "Potential for VMT Increases" in the Investment Plan.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>Multimodal Improve freeway overcrossings so that they provide multimodal benefits and "reconnect LB-ELA Corridor communities" separated by the freeway and river – safer pedestrian/bicycle crossings, improved reliability and effectiveness of bus/transit, improved arterial traffic flow to reduce accidents and pedestrian/bicycle conflicts</p> <p>Operational Safety-focused auxiliary lanes that provide transition zones for cars and trucks to more safely merge on and off the freeway at locations with greater numbers of accidents than a simple ramp design can address: Safety for residents/users at local access points</p> <p>Safety Provide safer conditions for all users of the freeway and local interchanges, especially community members accessing the freeway. Reduced conflicts for cars and trucks getting on and off the freeway: improved on and off ramps, transition zones, turn radius, traffic signal controls.</p> <p>Access Greater access to bus service, pedestrian/bicycle paths, and personal mobility leading to greater access to communities, education, healthcare, and other economic opportunities. Safer local access to the freeway system.</p>
Email	Allen Natian	San Pedro Resident	02/24/24	<p><a href="#">I would like to add on some specific examples I am concerned with:</a></p> <p><a href="#">Mislabeling Intersection Improvement with "interchange improvements" that can make it more dangerous for pedestrians and cyclists who cross ramps Breaking up a project to avoid federal scrutiny (Past Example) Using "auxiliary" lanes as a loophole to widen freeways.</a></p> <p><a href="https://urldefense.proofpoint.com/v2/url?u=https-3A_la.streetsblog.org_2024_02_02_metro-2Dreleases-2Dnew-2Dlower-2D710-2Dfreeway-2Dproposal-2Dagency-2Dplans-2Dto-2Dwiden-2D710-2Ddoesnt-2Drule-2Dout-2Dresidential-2Ddemolitions&amp;d=DwICAw&amp;c=euGZstcaTDilivimEN8b7jXrwqOf-v5A_CdpqnVfiiMM&amp;r=BlOE9-CsKSBQvHkccfao24sQ3ecsmn9VwCHWvFlp25pZpTGfV9oUEbHtoZSgj6D&amp;m=IBwb_sx2BG81ydVTWsl-W8iuml-noWX9ZAfpxPmq2lL178epzELBF_RYIQ1DAN0&amp;s=Xz5rYih5T8VoBK4tdWa3bfcVu0JW5Q55WY_RorQv0E&amp;e=">Source: https://urldefense.proofpoint.com/v2/url?u=https-3A_la.streetsblog.org_2024_02_02_metro-2Dreleases-2Dnew-2Dlower-2D710-2Dfreeway-2Dproposal-2Dagency-2Dplans-2Dto-2Dwiden-2D710-2Ddoesnt-2Drule-2Dout-2Dresidential-2Ddemolitions&amp;d=DwICAw&amp;c=euGZstcaTDilivimEN8b7jXrwqOf-v5A_CdpqnVfiiMM&amp;r=BlOE9-CsKSBQvHkccfao24sQ3ecsmn9VwCHWvFlp25pZpTGfV9oUEbHtoZSgj6D&amp;m=IBwb_sx2BG81ydVTWsl-W8iuml-noWX9ZAfpxPmq2lL178epzELBF_RYIQ1DAN0&amp;s=Xz5rYih5T8VoBK4tdWa3bfcVu0JW5Q55WY_RorQv0E&amp;e=</a></p>	<p>The I-710 interchange projects are renamed MOSAIC projects as that is what their design concepts include: Multimodal Operations, Safety and Access Improvements for Communities. The interchanges and associated arterial crossings of the freeway will include safe pathways for pedestrians and bicycles as well as vehicles.</p> <p>The next step in the MOSAIC interchange process is to conduct an Alternatives Analysis study that will assess the benefits, costs and impacts of each proposed interchange and auxiliary lane to prioritize them for environmental analysis in the next phase of their development. The Alternatives Analysis Study will also include an assessment of independent utility and segmentation under both CEQA and NEPA, to confirm that these are individual projects that can be implemented.</p>

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Marcel Sereboff		02/24/24	<p>To whom it may concern,</p> <p>I understand that Metro recently ran into a surplus of funds which can be used to assist mobility between Long Beach and East Los Angeles. As a Long Beach resident, I would like to share my perspective.</p> <p>Roughly a third of the funding noted the draft CMIP is going to freeway related projects. Time and time again it has been proven conclusively that freeway enhancements do not increase mobility. It stands to reason then that if the goal is to enhance mobility, this number should be as close as possible to zero.</p> <p>On the topic of freeways, the 710 and LA River are extraordinarily unpleasant and dangerous places to cross and navigate if a person is outside of a motor vehicle. This should be rectified to enable the people of West Long Beach and the various port communities access to Downtown Long Beach via active transportation such as walking and cycling.</p> <p>To best enhance mobility along this corridor, it would be ideal to prioritize bus lanes along Atlantic and Long Beach Boulevards. This would allow more space for the numerous public bus options along those streets. Additionally, rail enhancements should be studied. The A Line is one of the most successful and heavily traveled light rail lines in the country. On the basis of demand alone, it behooves Metro to investigate more rail options along this corridor. The natural next step is to bring Metrolink service to Long Beach. A fast and comfortable heavy rail option to Union Station would be a game changer for the community.</p> <p>Marcel Sereboff 90815</p>	<p>Thanks for your comment. The majority of the funding in the investment plan will support projects similar to what you mentioned, including bus priority on Atlantic and Long Beach Blvds. Much of the freeway investment will be used to address critical safety issues, facilitate zero emission technology, and support multimodal connections. The Alternatives Analysis study of these projects, which is the first step towards their potential implementation will address the issue of project segmentation from the CEQA and NEPA perspective. These projects are believed to have independent utility.</p>
Email	Kyle Jenkins	LA Resident	02/24/24	<p>Please do not widen the 710 freeway or add any lanes. It goes completely against all the stated goals of improving air quality and quality of life. Metro needs to put its money where its mouth is. No new freeway capacity or road widening in LA!</p>	<p>In 2021, the Metro Board approved Motions 47 and 48 which effectively ceased further work to advance the 710 South Corridor Project EIR/EIS.</p> <p>To ensure Metro's investments do not disproportionately impact communities of color, inadvertently worsen induced demand, or work against existing greenhouse gas emissions reduction goals. The new process was designed to undertake a holistic equity-based project examination. Our assessment process looked at induced demand for automobile trips based on their potential for VMT increases this would occur through induced demand for car trips and all projects were evaluated based on this metric. Please see Concern 9 "Potential for VMT Increases" in the Investment Plan.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>The proposed freeway improvements are aligned with the vision, goals and principles adopted by the LB-ELA Task Force and existing Metro Board Policy. This is illustrated below in what we are considering and not considering:</p> <p>What the Investment Plan Proposes Includes:</p> <ul style="list-style-type: none"> <li>•I-710 Mainline (Safety and Operational improvements)</li> <li>•Local Interchanges/Overcrossings (MOSAIC)</li> </ul> <p>Partial Freeway Interchanges</p> <ul style="list-style-type: none"> <li>•Technology</li> </ul> <p>What the Investment Plan Does Not Include Is:</p> <ul style="list-style-type: none"> <li>•Freeway widening</li> <li>•Full freeway to freeway interchanges</li> <li>•General purpose lanes</li> <li>•Concepts with displacements</li> </ul>
Email	Sara Carafino		02/27/24	<p>It would be wonderful tshe each station have historical facts and pictures fir each city metro train stop. Last stop should show envision future of rail roads. Plus have local school children of different age groups contribute artwork of their local communities. Or an essay contest with picture of child showing what they wrote. The future generation needs to share the vision going forward. Us old timers remember when their were the Red cars. I personally, was there when the Blue line open, Gold line and others. I am a transplant New Yorker City girl. I marveled how efficient city living and convenience to get around. We also need roving robocops on platforms. With City budget cuts for metro train police force limited; the robo roving cop will offer a sense of commuter security for both metro employees and traveling train passengers. Finally, provide visual TV or computerized walls highlighting places of interest for ppl to learn and see. Generate income by having community businesses advertise the city they are in LA county traveling MTA metrorail (Simular like Las Vegas Airport terminal and people mover areas). Keep up the great work.</p>	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Sara Carafino		02/27/24	No displacement of homes. Build upper ground stations similar to Compton and Firestone Stations Do both Environmental studies and retrofitting as we are an Earthquake state. Or as us from east coast say, " California shake,rattle and roll". It's similar to riding the NYC subway A train express. It shakes, rattles and rolls on sharp turns, 55 mph travel going up and down the miles of tracks connecting to different boroughs like the Bronx, Queens, Brooklyn, Manhattan ( Exception is borough of Staten Island. One takes the ferry or Bridge from Manhattan to the island. Toll road fee applies using bridges in 5 boroughs. They are also implementing NYC congestion fee traveling in the city from 60th Street to 14th Street( I think ). It goes into effect this year. Los Angeles does not have this concept yet. Sorry if I went off subject. Just build more trains to connect more cities and into other counties. Metrolink is great. Wish we could build upward MTA rail using center freeway divider or FastTrack lane. Need to get drivers to use mass transportation and diminish freeway congestion. Too many ppl reside in our great state, the largest with a very diverse population and growing.	
Email	Corey Bennett	Wrigley Heights Resident	03/01/24	OK: you've made a tiny start by occasionally enforcing fare payment on the A/blue line and putting security on one or two station platforms and the occasional bus. How about some more? It is still often disgusting and frequently scary to ride Metro trains and buses: I often drive when I could use public transportation for that exact reason. In an ideal world, I'd have given up driving a decade ago. I suggest that security, safety, cleanliness, and convenience be the primary design considerations in each and every proposed project as well as ease of access and safe use by elderly, disabled, and often defenseless persons. Thank you, Corey Bennett Wrigley Heights	
Email	Kyle Jenkins	LA Resident	03/04/24	Thanks for the reply. I would call new auxiliary lanes new freeway capacity, and interchange improvements sound like they will include street widening. So my comment is - Please do not add any freeway capacity or add any lanes to interchanges, surface streets, or the freeway itself.	<p>In 2021, the Metro Board approved Motions 47 and 48 which effectively ceased further work to advance the 710 South Corridor Project EIR/EIS.</p> <p>To ensure Metro's investments do not disproportionately impact communities of color, inadvertently worsen induced demand, or work against existing greenhouse gas emissions reduction goals. The new process was designed to undertake a holistic equity-based project examination. Our assessment process looked at induced demand for automobile trips based on their potential for VMT increases this would occur through induced demand for car trips and all projects were evaluated based on this metric. Please see Concern 9 "Potential for VMT Increases" in the Investment Plan.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>The proposed freeway improvements are aligned with the vision, goals and principles adopted by the LB-ELA Task Force and existing Metro Board Policy. This is illustrated below in what we are considering and not considering:</p> <p>What the Investment Plan Proposes Includes:</p> <ul style="list-style-type: none"> <li>•I-710 Mainline (Safety and Operational improvements)</li> <li>•Local Interchanges/Overcrossings (MOSAIC)</li> </ul> <p>Partial Freeway Interchanges</p> <ul style="list-style-type: none"> <li>•Technology</li> </ul> <p>What the Investment Plan Does Not Include Is:</p> <ul style="list-style-type: none"> <li>•Freeway widening</li> <li>•Full freeway to freeway interchanges</li> <li>•General purpose lanes</li> <li>•Concepts with displacements</li> </ul>

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
	Sylvia Betancourt	LBACA	03/07/24	<p>From: Sylvia Betancourt &lt;SBetancourt@memorialcare.org&gt;  Sent: Thursday, March 7, 2024 12:57 PM  To: Cano, Michael &lt;canom@metro.net&gt;  Cc: Ambrosini, Susan &lt;susan.ambrosini@aecom.com&gt;; Susan DeSantis &lt;SDeSantis@ArellanoAssociates.com&gt;; Cohen, Aryeh &lt;aryeh.cohen@aecom.com&gt;; Nora Casillas &lt;NCasillas@arellanoassociates.com&gt;; Calix, Robert (Consultant) &lt;CalixR@metro.net&gt;  Subject: RE: For your review: Air Quality and Health -- Community Program development</p> <p>Dear Michael,</p> <p>Thank you for reaching out about this opportunity to discuss Community Program development. I do appreciate that you're accommodating my capacity to participate. As I consider the proposed process for Community Program development and Working Groups, I still have outstanding questions. I want to be sure this meets the goals we set out at the beginning of this process a few years ago now. In fact, as far back as I recall from our first meetings to re-engage this process I've been patiently trusting in the promise to deliver meaningful community benefits and investment in 710 corridor communities, particularly addressing health. As we come to this phase where we make tangible and lasting decisions about where investments are made, I'm needing more clarity before moving forward.</p> <p>Relatedly, our CEHAJ partners and I also received a request to partner in implementing the proposed investment plan, but haven't received response to the questions we've raised. Can you please answer these questions to help me (and CEHAJ partners) determine if this opportunity is a good fit for CEHAJ?</p> <p>Questions previously sent:</p> <ol style="list-style-type: none"> <li>1.Implementation- During the task force meeting, Metro staff discussed a working group for community programs. Still, it is unclear whether each project category (such as freeways, arterial roadways, etc.) or area of investment (such as air quality, mobility, prosperity, etc.) will have its working group. If they do, how will participants be selected for each working group? Also, the same question applies to the working groups for community programs discussed on slide 49. Can you provide more information on who Metro will invite to participate in each category?</li> <li>2.The full scope of the projects is not yet known. We are currently unsure of the full scope of projects that Metro will include in the final investment plan. It also needs to be made clear which programs will require a working group to help with implementation. Based on the presentations we have received, many of the projects, including those outside of the Community Programs, still need to be fully developed. As we understand it, the CMIP is a conceptual guidance document that Metro will present to the Board for approval. Could you please clarify your reference to "transportation projects and community programs" that will require Metro to work with stakeholders such as CEHAJ to implement these? This suggests that some transportation projects and community programs have already been predetermined to remain in the investment plan. Can you confirm this?</li> <li>3.Tacit Endorsement- CEHAJ and other task force and CLC members are still assessing each proposed project and preparing written comments to Metro. We are concerned that joining an implementation working group before the full scope of projects in the investment plan is known might be interpreted as our endorsement of the entire plan, including projects that we may oppose in the end. Can you please explain the general purpose of the working groups? Will participation in the implementation working group be taken as an endorsement?</li> </ol> <p>Thank you, Michael!</p> <p>Kind regards,  Sylvia  Sylvia Betancourt (she/her/ella)  Long Beach Alliance for Children with Asthma - LBACA  2651 Elm Ave., Suite 100, Long Beach, CA. 90806 - (562) 933-5650</p>	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Joe Linton		03/05/24	<p>To whom it may concern -</p> <p>Two maps and their accompanying text in the CMIP draft appear to be incorrect.</p> <p>1) In section 3.2.2.1 describing maps in figure 3-4, the 710 draft CMIP states (Metro's The Source also stated this) The "Auto Ownership" map in Figure 3-4 shows that the Study Area has more zero-vehicle households than the County as a whole, except for those households in Downtown Long Beach. The northern portion of the Study Area has lower auto ownership rates. The map appears to show nearly the opposite of parts of the above text (and doesn't include the overall county level). The map shows relatively high levels of no-car households mapped in dark blue in/near downtown LB. So instead of:  ...Study Area has more zero-vehicle households than the County as a whole, except for those households in Downtown Long Beach.</p> <p>It might be more accurate to say:  ...Study Area has more zero-vehicle households than the County as a whole, especially for those households in and around Downtown Long Beach.</p> <p>The last sentence may be true, but doesn't really correspond to the map:  The northern portion of the Study Area has lower auto ownership rates.</p> <p>Maybe you have other data, but from just the map, I don't see a clear north/south split in the data mapped. Much of the northern portion is in green and yellow, indicating a lower no-car percentage, so higher auto ownership. There are a lot of urban centers mapped which do have lower ownership rates - including DTLB, East L.A., Huntington Park, Wilmington, Compton, Lynwood.</p> <p>So it might be more accurate to say something like:  Many portions of the Study Area have relatively low auto ownership rates, including much of Long Beach, and parts of Compton, East L.A., Huntington Park, Lynwood, South Gate and Wilmington.</p> <p>2) Figure 3-27 does not map the current bikeway networks in the area.</p> <p>A few things I spotted that are incorrect, not a comprehensive list:</p> <ul style="list-style-type: none"> <li>- The legend terms the right map a "bike lane network" but it maps more than just bike lanes. Some of the facilities mapped are not bike lanes but bike paths.</li> <li>- The blue lines are labeled as "protected bike lanes" but some blue lines mapped are bike paths.</li> <li>- Many (looks like probably roughly half) of the blue lines mapped do not correspond to actual bike facilities. Two specific examples: 1 -there is no bikeway along the Dominguez Channel between the 405 and PCH. 2 - there are no protected bike lanes in East L.A.</li> <li>- The bikeways mapped in Long Beach appear to be out-of-date. Many bikeway facilities are missing. It looks like the data there may be 5-10 years old.</li> </ul>	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Matthew Dornbach		03/08/24	<p>Hello,</p> <p>I am writing to express my porters against the 710 auxiliary lanes for the 710 corridor. This is a freeway widening despite claims it is not. This widening will potentially displace residents of the area, increase car use, and destroy areas that could otherwise be used for other forms of transit or other public benefit.</p> <p>No auxiliary lanes for 710 or any other freeway in this state!</p>	<p>In 2021, the Metro Board approved Motions 47 and 48 which effectively ceased further work to advance the 710 South Corridor Project EIR/EIS.</p> <p>To ensure Metro's investments do not disproportionately impact communities of color, inadvertently worsen induced demand, or work against existing greenhouse gas emissions reduction goals. The new process was designed to undertake a holistic equity-based project examination. Our assessment process looked at induced demand for automobile trips based on their potential for VMT Increases this would occur through induced demand for car trips and all projects were evaluated based on this metric. Please see Concern 9 "Potential for VMT Increases" in the Investment Plan.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>The proposed freeway improvements are aligned with the vision, goals and principles adopted by the LB-ELA Task Force and existing Metro Board Policy. This is illustrated below in what we are considering and not considering:</p> <p>What the Investment Plan Proposes Includes:</p> <ul style="list-style-type: none"> <li>•I-710 Mainline (Safety and Operational improvements)</li> <li>•Local Interchanges/Overcrossings (MOSAIC - Multimodal Operations, Safety and Access Improvements for Communities)</li> </ul> <p>partial Freeway Interchanges</p> <ul style="list-style-type: none"> <li>•Technology</li> </ul> <p>What the Investment Plan Does Not Include Is:</p> <ul style="list-style-type: none"> <li>•Freeway widening</li> <li>•Full freeway to freeway interchanges</li> <li>•General purpose lanes</li> <li>•Concepts with major displacements</li> </ul>

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Jani Purpura		03/08/24	<p>Reading the plan for the I-710 corridor, I do feel that improvements have been made to the plan. However, I do feel that more effective 21st Century solutions can be used on these projects. For instance, we have a great transit corridor that needs improvements, and a few more projects in the works. Instead of encouraging more driving, we should invest in transit, biking, and increase park space with the freed space. The following are projects that should be cut from the project and what unfunded projects they should be replaced with.</p> <p>Cuts:</p> <ul style="list-style-type: none"> <li>- Zero-Emission Infrastructure for Autos [LB-ELA_0191]</li> </ul> <p>--- Prioritize biking and transit (ebikes, e-scooters, other alt means to driving), as many people are traveling short distances. For longer travel, the A line is great at connecting people on the I-710 corridor.</p> <ul style="list-style-type: none"> <li>- Shoemaker Bridge/Shoreline Drive [LB-ELA_0010]</li> </ul> <p>--- Unless real connections for residents will be made via this route for pedestrians and bicyclists, it's better to close the bridge and redesign the Queens Hwy./former 710 stub towards Queen Mary for the people driving to downtown LB.</p> <ul style="list-style-type: none"> <li>- I-710 Multimodal Freeway Safety and Operations Infrastructure Improvement Projects Bundle [LB-ELA_0028, LB-ELA_0029, LB-ELA_0030, LB-ELA_0031, LB-ELA_0032, LB-ELA_0033, LB-ELA_0034, LB-ELA_0035, LB-ELA_0036, LB-ELA_0037, LB-ELA_0038, LB-ELA_0091, LB-ELA_0092, LB-ELA_0093]--- The cost for these projects (\$612 million) are better served by doing large scale transit projects that would serve more people and significantly decrease transit time (for instance, project LB-ELA_0173 would save commuters at least 10 minutes, as travel time between Pico station and Washington stations on the A line would likely fall to 5 minutes versus the 15-20 that it currently takes.</li> <li>- Atlantic Boulevard widening Over I-5 at Mixmaster Intersection [LB-ELA_0221]--- Widening Atlantic over I-5 does not help the community, as this street is already 3+ lanes wide in each direction on the bridge. It would not be hard to install a bus lane and change the signal timing in the area improve conditions on the bridge.</li> </ul> <p>Fund:</p> <ul style="list-style-type: none"> <li>- Grade Separation(s) of the A Line [Blue Line] at Washington Street [LB-ELA_0173]--- This grade separation project would save commuters between Long Beach and Los Angeles (the primary use of I-710) around 10 minutes via transit, encourage alternate means. This would be much more effective than spending over \$600 million on a freeway.</li> <li>- Metrolink Regional Rail Line between Union Station and Long Beach [LB-ELA_0219]--- Along with the A line project above, commuters would move faster along the I-710 corridor than they can during most hours on the I-710 freeway.</li> <li>- C Line (Green) Eastern Extension (Norwalk) (LRT) [LB-ELA_0002]--- This project is sorely needed to increase connectivity between County services in Norwalk and the rest of the area. With this extension, many employees would likely take the C line versus driving.</li> <li>- Southeast Gateway Line Transit Corridor (LRT) [LB-ELA_0001]--- This project would help connect Huntington Park, Cudahy, and other Gateway Cities to the region, which is sorely needed.</li> <li>- I-710 Livability Initiative [LB-ELA_0214]--- Mitigation is sorely needed for the pollution and other issues created by the I-710 freeway.</li> </ul> <p>Thank you for taking the time to consider my ideas on the project.</p>	<p>Thank you for the comment. We appreciate the feedback on specific projects and will consider these comments as we consider future funding decisions. We recognize that this is a multimodal plan and that not all projects may be supported by all community members; however, we believe that each project that is recommended for funding will help advance the vision and goals of the plan and will support the needs of the communities as a whole. There will be opportunities to contribute to future investment decisions and we hope that you continue to provide feedback.</p>

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Comm. Sharon Weissman	Port of Long Beach	03/18/24	<p>Hello Michael and Robert,</p> <p>Here are some of our thoughts at the Port on the Draft Investment Plan sent to us at the end of January.</p> <p>Will you be highlighting tonight changes, if any, from the plan sent in January?</p> <p>Thanks, Sharon</p> <p>DRAFT Port of Long Beach Comments – March 2024 Draft Long Beach-East Los Angeles Corridor Mobility Investment Plan</p> <p>1. Acknowledgments – Task Force, Freight and Logistics Industry, pg. xii: a. Revise title for Theresa Dau-Ngo, Director of Port Planning</p> <p>2. Table 8-1. Corridor Investments Supported by Other* Funding Sources, p. 8-3: a. Revise information on Port of Long Beach projects to remove double-counting of project costs. The Pier B On-Dock Rail Support Facility project costs are included in both the SWIFT program, which received PFIP funding, as well as under the “America’s Green Gateway: Pier B Rail Program Buildout” which received Mega funding. See attached revised table for breakdown of all grants awarded to the various components of the Pier B On-Dock Rail Support Facility project.</p> <p>3. Table 8-8. Freeway Safety and Interchange Improvements Modal Program, p. 8-74: a. The “Congestion Pricing” and “Express Lanes Strategic Initiative” projects should not be listed as Tier 1 for the I-710 freeway.</p> <p>4. What is the proposed plan for the Task Force following adoption of the LB-ELA Corridor Investment Plan?</p> <p>5. How will progress/implementation of the proposed projects in the LB-ELA Corridor Investment Plan be monitored? Will there be updates to performance metrics and benefits of the projects?</p> <p>Thank you, Sharon</p> <p>*ADDITIONAL ATTACHMENTS PROVIDED IN ENGLISH ONLY</p>	Thank you for the comment. We have addressed those comments in the final plan.
Email	Kerry Cartwright	Port of Los Angeles	03/19/24	<p>Michael,</p> <p>Attached are edits/comments on the draft CMIP:</p> <p>•As info, for workforce development, see attached planned POLA-POLB Goods Movement Training Campus project info, that should be added to the doc</p> <p>•Also, specific recommendations and required edits attached</p> <p><input type="checkbox"/> As verbalized several times, the following should be removed: congestion pricing, ZET lanes/travel zone restriction due to CARB ACF and ACT soon to be in full effect (CARB awaiting EPA waiver)</p> <p><input type="checkbox"/> 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; the document should merely denote studying ZE tech for locomotives and not make a specific notation about the AC;</p> <p>Kerry Cartwright, P.E. Director of Goods Movement 310-357-4996 (cell), 310-732-7702</p> <p>*ADDITIONAL ATTACHMENTS PROVIDED IN ENGLISH ONLY</p>	
Email	Chris Chavez	Coalition for Clean Air	03/15/24	<p>Please find attached our comment letter on the draft LB-ELA Corridor Mobility Investment Plan.</p> <p>_____ Christopher Chavez Deputy Policy Director Coalition for Clean Air chris@ccair.org&lt;mailto:chris@ccair.org&gt; (213) 223-6868</p> <p>END OF EMAIL</p> <p>*LETTER PROVIDED IN ENGLISH ONLY</p>	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Matt Schrap	Harbor Trucking Association	03/18/24	<p>Thank you, Kerry. @Michael, we completely agree with the comments from POLA. I unfortunately will not be able to make the meeting tonite due to a standing conflict.</p> <p>Matt Schrap Harbor Trucking Association 213-361-7588</p>	
Email	Esteban McKenzie	North Long Beach Resident	03/19/24	<p>To whom it may concern, While the draft investment plan is a huge improvement over the original freeway widening, there is still a lot of room for improvement. Metro communication has repeatedly stated that this plan "does not widen the freeway whatsoever" which this plan shows is a blatant lie. This plan adds approximately 4 freeway lane miles throughout the study area, and Metro has yet to commit to Supervisor Hahn's request to categorically rule out demolitions. More lane miles are more lane miles, whether you call them auxiliary lanes, or break the widenings up small enough to utilize a loophole in CEQA. The community has been clear that we want NO WIDENING of the freeway. The ROW is massive as is, and any "flow improvements" metro really finds necessary must be captured within the existing ROW. We as a society have grossly overbuilt our infrastructure, and year after year the American Society of Civil Engineers offers more stark assessments showing that we cant afford to maintain the infrastructure we have. Freeway widenings have been proven to induce demand, and metro's own reports have shown that its investments widening freeways as well as arterial streets are canceling any reduction in emissions generated by its transit investments. When you're at the bottom of a hole, first you need to STOP DIGGING YOURSELF DEEPER. Enough is enough. Metro needs to take its role as a transit agency seriously and stop pushing autocentric design. Sincerely, Esteban McKenzie North Long Beach Resident and Homeowner</p>	<p>In 2021, the Metro Board approved Motions 47 and 48 which effectively ceased further work to advance the 710 South Corridor Project EIR/EIS.</p> <p>To ensure Metro's investments do not disproportionately impact communities of color, inadvertently worsen induced demand, or work against existing greenhouse gas emissions reduction goals. The new process was designed to undertake a holistic equity-based project examination. Our assessment process looked at induced demand for automobile trips based on their potential for VMT Increases this would occur through induced demand for car trips and all projects were evaluated based on this metric. Please see Concern 9 "Potential for VMT Increases" in the Investment Plan.</p> <p>The Investment Plan that Metro is proposing builds a cleaner, sustainable, and healthier future by supporting multiple modes and putting people first and here is how.</p> <p>The proposed freeway improvements are aligned with the vision, goals and principles adopted by the LB-ELA Task Force and existing Metro Board Policy. This is illustrated below in what we are considering and not considering:</p> <p>What the Investment Plan Proposes Includes:</p> <ul style="list-style-type: none"> <li>•I-710 Mainline (Safety and Operational improvements)</li> <li>•Local Interchanges/Overcrossings (MOSAIC - Multimodal Operations, Safety and Access Improvements for Communities)</li> </ul> <p>partial Freeway Interchanges</p> <ul style="list-style-type: none"> <li>•Technology</li> </ul> <p>What the Investment Plan Does Not Include Is:</p> <ul style="list-style-type: none"> <li>•Freeway widening</li> <li>•Full freeway to freeway interchanges</li> <li>•General purpose lanes</li> <li>•Concepts with major displacements</li> </ul>
Email	William Frankenfeld	Los Cerritos Resident	03/12/24	<p>Dear Metro Staff My name is William Frankenfeld, I live in the Los Cerritos neighborhood in the 90807 zip code along the 710 freeway corridor. The proposed auxiliary lanes on the 710 freeway in Long Beach will only increase pollution and worsen traffic. LA Metro needs to reallocate the funds to improving local public transportation, like investing in electric buses, and improving the local freight rail to reduce freight truck usage. Thank You William Frankenfeld</p>	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Email	Coalition for Environmental Health	Coalition for Environmental Health & Justice (CEHAJ), Long Beach Residents Empowered (LiBRE)	03/28/24	<p>March 28, 2024 via electronic mail Michael Cano, Executive Officer LA Metro 1 Gateway Plaza Los Angeles, CA 90012 CanoM@metro.net and 710Corridor@metro.net Re: Long Beach-East Los Angeles Corridor Mobility Investment Plan</p> <p>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").</p> <p>*LETTER PROVIDED IN ENGLISH ONLY</p>	
Email	United States Environmental Protection Agency, Region 9	United States Environmental Protection Agency, Region 9	03/29/24	*LETTER ATTACHED, LETTER PROVIDED IN ENGLISH ONLY	
Email	BizFed	BizFed	04/02/24	<p>Good afternoon Michael and all,</p> <p>Attached is a comment letter regarding the released draft of the Mobility Investment Plan.</p> <p>If you have any questions, please don't hesitate to contact me.</p> <p>☐ Chris Wilson, Senior Advocacy Manager (562) 201-6034 - chris.wilson@bizfed.org Los Angeles County Business Federation Strengthening the voice of business since 2008 by uniting 235 diverse business groups mobilizing 420,000 employers with 5 million employees CLICK TO RSVP: Celebrate extraordinary business leadership at the Bizzi Awards Ceremony on 3/22</p> <p>*LETTER PROVIDED IN ENGLISH ONLY</p>	
<b>Project Meetings</b>					
<b>CLC Meeting #25</b>					
CLC Meeting #25	Kathleen Barajas		02/15/24	It seems very comprehensive from what I have read so far!	
CLC Meeting #25	Dan Wamba		02/15/24	I have reviewed the CMIP and support the projects approved for initial investment. I also note that Table 8-6 has a list of projects to be watched for further refinement and implementation through the Arterial roadways/Complete Streets Modal Program.	
CLC Meeting #25	Aide Castro		02/15/24	I support the projects approved for initial investment. Yes, I support the Draft Investment Plan	
CLC Meeting #25	Kathleen Barajas		02/15/24	I support the proposal.	
CLC Meeting #25	Miyuki Gomez		02/15/24	I support the proposal.	
CLC Meeting #25	Maria Reyes		02/15/24	I still have a lot of concerns and worries.	
CLC Meeting #25	Elizabeth Zamarripa		02/15/24	I will stand aside for now, I'd like to review the materials on my own once more	
CLC Meeting #25	Alfonso Garate		02/15/24	I support	
CLC Meeting #25	Luis Mesa		02/15/24	I was wondering if there is a way for Metro to present the plan in each of the cities websites so people can easily access it through their cities websites presenting a summary on each cities projects that are included in the plan.	
CLC Meeting #25	Maria Reyes		02/15/24	When it comes to Long Beach I don't see or think we have received information on the Investment Plan, also was it in Spanish?	Each city received a toolkit of the projects for their areas in the investment plan but unfortunately I can't tell each city to post on their website but all cities were provided to them to post on their socials.
CLC Meeting #25	Tiesha Davis		02/15/24	For the air quality, did they decide regarding what they will be doing and how they would make it relevant or make changes to the topic?	Many of the projects on the initial list for funding have positive impacts on air quality and that fit the criteria especially 3 projects that were specific too air quality.

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CLC Meeting #25	Marcos Lopez		02/15/24	How is the plan ensuring that all of the project like auxiliary lanes or multimodal street that the landscape will be included as a part of the projects. I have seen that sometimes funding has caused landscape to not be addressed when a project is put together and I want to know if that will be resolved in this plan.	I think it is baking it into the scope to make sure it is centrally agreed upon before it goes into the implementation of the project that it is included in the language to see that it is actually carried out, that is guidance too us to make sure that we make that specifically included.  It is part of the scope of the development of the project and because we have the CIC flags and Equity flags included in those it can be highlighted and incorporated to ensure it is built into the price and cost of the project so it is a component in the implement that will be necessary/guaranteed to be delivered.  Such as the urban greening project, we are looking at community program projects to include in the initial funding of the project that we make it a necessity to include landscaping in the funding so that urban greening program could supplement that funding to the projects.
CLC Meeting #25	Tiesha Davis		02/15/24	For economic impact, are they going to host a job fair/open house and what does that entail when you say economic impact?	Several of those things you mentioned are included in that plan and developing the workforce or hiring locally are taken into consideration. We are looking across all of that.
CLC Meeting #25	Tiesha Davis		02/15/24	To make sure that the community skill level is matched for the area when implementing new jobs.	
CLC Meeting #25	Maria Reyes		02/15/24	How is it that we are going to cover the topic of employment and include it in the investment plan because people don't know what skills will be needed to have the ability to have the chance to get the jobs listed in the investment plan?	If the plan is silent, included but not called out directly but at Metro we have programs targeting directly monolingual Spanish speaking community members. Metro has a program that incentivizes monolingual Spanish speakers to allow for operators to have a job even if they don't speak English.
CLC Meeting #25	Marlene Sanchez		02/15/24	I was wondering what is expecting out of this heavy document and the book because I don't see how anyone can comprehend all of this material.	We have a month to go through the document itself and the foundational chapters help set the stage for all of the content/process and to discuss the existing conditions. The last 4 chapters are too set the stage for the projects and programs that will be implemented. We want all community questions and comments to be stated and taken into account before we get to have the board see this.
CLC Meeting #25	Marcos Lopez		02/15/24	On existing conditions, there is a map on 3-42 regarding the transit bus number. There was only metro data but I don't think it shows all of the bus information specifically for long beach bus trips.	We will update that
CLC Meeting #25	Marcos Lopez		02/15/24	If a project ever has a plan will it be attached to the project on the dashboard?	Project information will be consistently added continually and will be built out. We will look into that with the dashboard team to make sure we look into that.
CLC Meeting #25	Kevin Shin		02/15/24	One of the things I noticed was the distribution of funding and how that distribution of funding goes across the different categories of projects. 1/3rd of the funding currently shows that it will go for freeway projects and those projects include interchange and bridge development. In terms of helping people understand the benefits to the projects, is there a better way to showcase the information of the actual benefits for the community besides categorizing the information in the way we have.	As we characterize the projects during the MSPP phase, we created the 5 modal categories and the community programs and once they were developed we assigned the project to the principle modal category it fits into. However, whenever we go to measure benefits and impacts we need to characterize all of the modes it affects if it were too be implemented to ensure that it does not negatively impact the surrounding infrastructure. By doing this we can build in safety improvements for bicycle and pedestrian improvements and traffic improvements improving the overall safety for all people and modes.
CLC Meeting #25	Kevin Shin		02/15/24	I feel like the details are being lost when it is explained by the community, we should spend more time actually articulating how much money is going to each separate aspect of the project so we are showing the division of the benefit in a more helpful way!	I appreciate that point and we will work on that in our messaging regarding the different benefits for the projects.
CLC Meeting #25	Jose Rodolfo Vallejo		02/15/24	The CLC is thinking of having hybrid meetings or potential in person meetings because two of the meetings I attended it seemed to me that it was very useful to learn in person for me. I must say that when I got the book of the CMIP I think we should reclassify and show that if you refer to each made in a table of contents it will be easier to identify.	We have for the next CLC meeting that are virtual so there was no in-person meetings listed at the time but there is one more community meeting in Compton coming up but we are happy to also have a one on one.
CLC Meeting #25	Irma Lopez		02/15/24	I think we should not allow hydrogen in any of our vehicles and focus our efforts on implementing Zero-Emission vehicles.	The discussion of that is in the initial chapters of the plan and in the projects that are listed so we have that listed.
CLC Meeting #25	Irma Lopez		02/15/24	You also mentioned that the LA River Project, will that be remodeled and they told me on the Corridor Tours that the bridge on Florence will have the local government get to take care of it. Will that be on the local government for that city to fix it or will it be fixed in this plan.	The LA river is a part of the project list in the plan and the community programs you mentioned there was a need for more funds added too that and we discussed that \$40 million was allocated for those programs to be pushed to the next step.
CLC Meeting #25	Irma Lopez		02/15/24	I think 40 million is not enough and we need to look out for our communities to make sure that high quality clinics for everyone is added, quality infrastructure on the streets, cleaner streets and we need people in the SELA area can see that there is a huge need for change this is discouraging to see all of the safety issues.	You are correct that there is a lot of need, and this process has helped metro with understanding the true needs of these different parts of the corridor and too connect the people back to the communities transcend transportation. The funding source by law has to go to transportation and there was set parameters set up by that. Our thinking has been to identify the issues and how can we create the potential funding that metro doesn't control as a transportation agency. We deal with only transportation and we need to work with our other agencies and counties to ensure that these issues are met by all people by the correct people who can help by leveraging our funding and relationships to develop tangible outcomes for the people to get these grant funding opportunities to get a perpetual investment that is ongoing to have the right people at the right agencies to make sure that the people with the right expertise are all involved.
<b>CLC Meeting #25.5</b>					
CLC Meeting #25.5	Jamila Cervantes	CLC	02/22/24	I do worry a tiny bit a little bit about moving away from "freeway" because i also don't want the language to be misleading if the project does focus on freeway-related improvements. don't have any solutions LOL but worry!	
CLC Meeting #25.5	Esmeralda Hernandez	CLC	02/22/24	I'm definitely echoing what Kevin is saying. I'm thinking about how the city of Bell (one of my neighboring cities) misappropriated a lot of public funds a few years ago & I'd love to see the mechanism for accountability also, do we have a plan for how the updates will be disseminated? Like are we thinking email, meetings, etc?	We will keep you in the loop as we think through the details and on the timing of these meetings and relaying that information
CLC Meeting #25.5	Marcos Lopez	CLC	02/22/24	I want to comment on topic 2, apologies my wifi was not stable. I have noticed that SG is starting to "beautify" the streets, however there is a big concern onto the amount of trees that are being brought down. We already lack on green spaces. My question is, how could we get more funding for trees in our area. Specially in Imperial, Atlantic and other streets, there are a lot of streets that are being worked on but they're cutting down our trees. We already live next to the 710, asthma and other cardiovascular diseases are some of the exposed symptoms for our community but how can you guys assure us there will be green spaces ?	Some projects have greening already incorporated in the project scope and they will address those features as they are developed. We have a community program called community greening where Metro is looking to collaborate to ensure that the program is developed with the CLC and TF members and one of the ways this could work is when a project doesn't involve greening elements and they will provide with technical/funding assistance to work that project in.
CLC Meeting #25.5	Luis Mesa	CLC	02/22/24	How can this plan help fund that project that has been floating around for years? (The freeway terminal 103 project)	
CLC Meeting #25.5	Tiesha Davis	CLC	02/22/24	Do Freeway projects include cleaning up graffiti on freeway signs?	There is a freeway landscape category which can include that

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CLC Meeting #25.5	Phyllis Ollison	CLC	02/22/24	Within streets projects -- dividers -- we have a lot of accidents-- is there something being considered to prevent or make it difficult to do spinning in intersections?	In some instances, complete streets projects could help prohibit that kind of activity. Not aware of any physical infrastructure that can prevent this at large intersections. More at the discretion of enforcement.
CLC Meeting #25.5	Phyllis Ollison	CLC	02/22/24	In Compton, they installed some devices to slow it down since law enforcement is not doing anything impactful. They're not all major intersections.	
CLC Meeting #25.5	Kevin Shin	CLC	02/22/24	Does this mean w those implementation guidelines, cities or jurisdictions won't receive funds till after projects are completed or will there be a mechanism to enforce how a city uses them? When this is the case, they often end up cutting things like infrastructure projects.	Usually have funding agreements that lock in scope & requirements. It's a binding agreement w expectation of outcomes.
CLC Meeting #25.5	Kevin Shin	CLC	02/22/24	If those funding agreements are violated, what is the mechanism? How is it enforced?	There is one mechanism we can use where we allocate funding by specific phase. During that phase is when you find out if the city is able to integrate the component, then add language that says they need to come back to prove or show how those elements were incorporated & provide justification if they weren't.
CLC Meeting #25.5	Marcos Lopez	CLC	02/22/24	If measures like these are added, nice to know that the details won't be getting lost.	
CLC Meeting #25.5	Marlene Sanchez	CLC	02/22/24	Scary getting onto the new 710 bridge. San Pedro is very active. People go through smaller freeway. West LB being so isolated, not a lot of places we can go. The park being there is too close to the refineries. Recreational activities in those areas are not good idea.	It would remove it as a freeway but it would still be a way to move.
CLC Meeting #25.5	Maria Reyes	CLC	02/22/24	When they were talking about WLB, like Marlene said, nice place, but concerned about the 103 freeway. Lots of trucks on that freeway. I also emphasized we needed to change that freeway, its so small but so transited & goods movement. There needs to be a change & benefits to health. Lots of schools on those corridors, that traffic is terrible & there are no changes to the place.	103 freeway is the terminal island freeway -- but which bridge is it?
CLC Meeting #25.5	Maria Reyes	CLC	02/22/24	Want to support Marlene's idea of having a place to come together & talk about the CMIP. It's more engaging when in person. Important to come together to review it & absorb what others are saying.	
CLC Meeting #25.5	Tiesha Davis	CLC	02/22/24	As projects are being more designed, starting to see gaps. Good question from Kevin re financial assignment. Re local jobs, are they making those available via what mechanism? Is funding being given pre or post completion?	This would be policy set by LA Metro or local jurisdictions. Who will be hiring & how many jobs will be determined based on projects as they come forward. Typically funding is given first.
CLC Meeting #25.5	Marcos Lopez	CLC	02/22/24	LB Complete street projects -- assume there will be a protected bike lane. Is that correct?	Planning is each jurisdiction is tailoring it to status of roadway within their boundaries. Attempt to keep separate bike lane along the entire stretch but some areas cannot do that w/out taking ROW. Would have to switch to class 3.
CLC Meeting #25.5	Clara Solis, Member of Public	CLC	02/22/24	Comment on map -- it's really hard to see the projects. For ELA, there is only one dot within the project, then another one outside north of Pomona freeway that doesn't work, then ppl need to know to make them bigger. But then it doesn't include all the projects. Confusing & hard to navigate the Dashboard. Mentioned Appendices, have not been able to access them on Dropbox. Have you all continued the deadline for comments?	
<b>Task Force Meeting #29</b>					
Task Force Meeting #29	Chris Chavez	Coalition for Clean Air	02/26/24	We're still in the process of going through the Plan and get a better understanding of everything. There's a lot in this plan that is an improvement over 5C. There are a few things we noticed with some plans on interchange proposals being bundled together. The question that we have always been asking is about VMT increases. Having more information about that is very important. There needs to be a commitment not to significantly increase VMTs. With those projects being bundled together, how will CEQA be handled?	5C is totally gone, so there's not a starting point with that. We're trying to get away from what was there. We want to work with the community in each of the locations and ask what are the needs in those area. What are the issues with safety, design, trucks, etc.? How do you make that connective tissue between the roadways in the corridor to the bridges and offramps. It's really open to a case by case, community by community situation. We are not trying to create displacement. We are not trying to create something that only works for cars and trucks, but not communities. It's about creating a harmonious approach. Every single one of those local interchanges needs investment of some kind. I think we can continue to work on that approach and continue to improve and make things safer.
Task Force Meeting #29	Chris Chavez	Coalition for Clean Air	02/26/24	One thing I also want to note is the Complete Streets project. We've support projects like this before. There certainly is a lot of good suggestions and ideas in this plan. I want to make sure we're continuing with Complete Streets.	
Task Force Meeting #29	Commissioner Sharon Weissman	POLB	02/26/24	Regarding Chris comment regarding interchanges, want to make sure if there is an increase in VMT because accidents are reduced, that we don't say we don't want to make the freeway safer because it increases VMT. If we can save lives & prevent accidents, we want to do that. Want to hear from Metro regarding how is that evaluated?	Overall, you're right. Safety rises to the top. Need to better present it & show what it looks like so ppl have comfort in what they're doing.  Key evaluation criteria. No prohibition from freeways improvements & safety to not generating additional VMT. Projects will be looked at in holistic way so can offset the VMT increases. Need to bundle together to make sure safety is predominant & important metric evaluated along w other changes.
Task Force Meeting #29	Chris Chavez	Coalition for Clean Air	02/26/24	Does LA Metro have a defined threshold or amount that would be considered a significant VMT increase?	As Michael said - we can get back to you on the VMT threshold, but at this point, our understanding is that Metro is waiting on Caltrans' guidance that is under development
Task Force Meeting #29	Alberto Campos	SELA Collaborative	02/26/24	I think it's great plan given the conversations we have had throughout this time. In terms of implementing the Plan, I fully support it first and foremost. The SELA collaborative, because we are a collective, to be able to move forward 1) we would need the permission of our Board. We want to make sure there is different representation in these groups. I think especially about representation from cities and other nonprofits.	
Task Force Meeting #29	Alberto Campos	SELA Collaborative	02/26/24	Given the extent of the projects across the region, I think it would be beneficial to have the region broken down into smaller groups. I think it would alleviate pressure from organizations who might feel that they need to expand their bandwidth to meet the needs coming from the Investment Plan. The nonprofits could invite other stakeholders to come in and share their expertise that pertains to a specific region.	
Task Force Meeting #29	Janeth Preciado Vargas	CBE	02/26/24	I've been sharing the Investment Plan with some of our youth member and their parents'. It is a hard thing to break down and explain in an easier way. I think making the Investment Plan more simple for community members to understand is something that could be worked on moving forward.	
Task Force Meeting #29	Marlin Dawoodjee Vargas	LBACA	02/26/24	Want to mention what I noticed -- lack of clarity when it comes to community programs & what requirements will be asked from community patterns to carry out these projects. What would be the process of assigning these projects to agencies/orgs. Would want for Metro to put in writing how Metro will do this & how they will hold them accountable to the guiding principles. Having this in writing would help put her mind at ease.	
Task Force Meeting #29	*Need to refer to transcripts*		02/26/24	Completely support Commissioner Weissman's comments.	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Task Force Meeting #29	Fernando Gaytan	Earthjustice	02/26/24	This may be covered later , but are working groups expected to run through implementation of selected community programs?	Make sure we get the right parties involved. Ongoing relationship & discussion. Metro may not be leading it, maybe another group, but value we want to derive from the community programs we want it to continue to generate over time
Task Force Meeting #29	Commissioner Sharon Weiss	POLB	02/26/24	I want to say a couple things about hydrogen. I think we need to look at what the technology of the future is, not just the state it is in now. I realize the majority of hydrogen is made of fossil fuels but that is not our plan for the future. When we look at the future, I think green hydrogen is going to be the future. We have transitional fuels. The other things that I saw in the CEHAJ letter had to do with water. An article in Chemical Engineer talks about developing green hydrogen from sea water. I would encourage you to look at that. I don't think the future is using California's limited water supply to make hydrogen. We have to look at safety in any technology. There has been a number of explosions with lithium batteries. I want us to deal with the reality of the future and not what we're limited by with technology today.	Thank you for your note expressing concerns about hydrogen. Metro also is concerned about the environmental impact of hydrogen production. The safety risks associated with the transportation and storage of hydrogen, including risks related to pipelines, trucks, rail, and ships. We are also concerned about hazardous emissions such as Nitrogen Oxide (NOx) from hydrogen combustion and its impact on respiratory health in vulnerable communities.
Task Force Meeting #29	Fernando Gaytan	Earthjustice	02/26/24	Point of the letter -- cannot rush to invest in tech still being developed when we have battery electric tech that is still there. Need to coordinate w communities to coordinate according to their needs. POLB/POLA making in roads to increasing [fill in gap here]. These are precious public dollars we have. Pie is there, hoping to grow it but it is limited. Community said loud & clear they want these investments to remediate past harms in their communities. Lets get those implemented w this plan. There will be more opportunities & funding for the hydrogen of the future. This is in line w equity principles. Want more precise language re what we mean about zero emissions. Focus on plan that will actually serve the community	Thank you for your note and for your concerns regarding hydrogen and zero-emission technologies. You also noted the importance of using the Investment Plan to remediate past harms in the I-710 South impacted communities.  For your information, the Investment Plan includes a high-level summary of work that has been done by the Zero-Emission Truck Working Group. As part of this effort, eight principles were developed early on and approved by the Metro Board of Directors to guide their activities. Among the eight principles was the Corridor Community Benefits - by creating economic opportunities, improving air quality, and reducing long-standing health impacts generated by diesel trucks. See 2-13 and 2-14 in the Investment Plan.  Since adopting these principles, the ZET Working Group held focus group discussions with industry, infrastructure, and community stakeholders to identify needs in pursuit of Metro's vision for regionally significant ZE infrastructure facilities. These focus group discussions were critical in developing Metro's Vision for Regional ZE Infrastructure Facilities. Community-identified needs focused on impacts on safety, public health, reduced congestion, and avoiding sensitive receptors. Community members who participated in the focus group discussion also emphasized their desire for Metro's investment to result in benefits to the surrounding communities, including job opportunities and neighborhood beautification. Industry and Infrastructure needs focused on grid capacity and identifying locations that complement the needs of existing goods movement patterns.
Task Force Meeting #29	Jennifer Ganata	CBE	02/26/24	CBE is a member of CEHAJ. CBE has been working with national partners on hydrogen. I wanted to highlight the equity principles and concerns around hydrogen. Thank you.	
	Jennifer Ganata	CBE	02/26/24	<a href="https://www.cbecal.org/issues/equity-and-hydrogen/">https://www.cbecal.org/issues/equity-and-hydrogen/</a>	
Task Force Meeting #29	Chris Chavez	Coalition for Clean Air	02/26/24	We're still in the process of going through the Plan and get a better understanding of everything. There's a lot in this plan that is an improvement over 5C. There are a few things we noticed with some plans on interchange proposals being bundled together. The question that we have always been asking is about VMT increases. Having more information about that is very important. There needs to be a commitment not to significantly increase VMTs. With those projects being bundled together, how will CEQA be handled?	
Task Force Meeting #29	Chris Chavez	Coalition for Clean Air	02/26/24	I would suggest, especially for smaller non-profits/organizations, is compensation for continued involvement. This process took a lot of effort and time and so I would like to see Metro consider that.	
Task Force Meeting #29	Roderick Diaz	Metrolink	02/26/24	Working groups a good idea to keep ppl engaged & line of communication open	
Task Force Meeting #29	Marisol Barajas	Long Beach Transit	02/26/24	Look forward to learning more about the work groups moving forward. But echo sentiment that it could be overwhelming to invite other partners to join given the history of this project and other projects. Will be interesting to see how it rolls out	
Task Force Meeting #29	Jennifer Ganata	CBE	02/26/24	Membership is both adults & youth, thinking about how they get them into those spaces, thinking about ability to share info before those meetings so ppl can prep & feel comfortable coming into those meetings. Maybe popular education materials ppl can use. Needs to be meaningful community participation. Important to make sure this info is getting to folks mostly impacted.	
Task Force Meeting #29	Chris Wilson	BizFed	02/26/24	I think for us, we are focused on going back to our members and getting their feedback before April 1st.	
<b>Task Force Meeting #30</b>					
Task Force Meeting #30	Fernando Gaytan	Earthjustice	03/18/24	I first want to start by thanking staff for their efforts to make these accessible I am pleased to hear these community events happened. I also want to thank Metro for listening to community concerns regarding commenting on the Investment Plan. We're down to the wire. I think this final push to analyze the projects being proposed. We want to thank Supervisor Hahn for supporting us in this extension. I am hoping that this further feedback will be reflected in the final analysis. I also want to uplift Supervisors Hahn and Solis for supporting community programs. Overall, I think having these community facing programs will be essential. What you'll see from us, and we're hoping to provide you with some comprehensive comments pretty soon, is a call to make sure those community programs don't fall by the wayside. We need to see a balance in terms of the monetary amounts that are being invested. You'll see some comments there in terms of making sure those dollar amounts are balanced.	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Task Force Meeting #30	Mario Dominguez Jr.	N/A	03/18/24	I got a problem with what I'm hearing. I'm not happy with the LA County Supervisors who I believe are racist. If you come down to my city here in South Gate and I got one street, Garfield Ave., between Imperial Highway and Firestone Blvd. Just walk that stretch of road and you'll see just how industrial my city is. You folks need to blast this fuckin thing, and launch it to the moon. You need to make this happen with lightning speed. I am going to need someone who is going to fight for my city and the surrounding cities near South Gate to deliver a project. We are talking about decades of neglect, decades of abandonment, of being forgotten and tossed aside. Where is the vision, where is the commitment. Hell, where is the investment. That is what I want to see. I heard a lot of talk, now I want to see implementation. You people need to go to work now.	
Task Force Meeting #30	Connell Dunning	EPA Region 9	03/18/24	I want to understand the difference between air quality, community health, and environment. Is it the source of funding that's causing the difference? What is causing the difference between air quality and greenhouse gases?	I would say don't take these groupings to be gospel. The reason they are split out is that the air quality/community health deals with direct impacts to health. The environment section deals more with environmental impacts. However if that's confusing we are definitely open to that feedback.
Task Force Meeting #30	Comm. Sharon Weissman	Port of Long Beach	03/18/24	Were any changes made to the draft Investment Plan made following feedback received since it was released in January?	We are waiting to make changes until we get through the entire public comment period. What's out there that has been published remains the same. We'll be consolidating all the feedback once the public comment period ends and then we will offer a "What's Changed" way of looking at things in April.
Task Force Meeting #30	Comm. Sharon Weissman	Port of Long Beach	03/18/24	Are we voting on something different in April than we are today?	April will have some new recommendations. We want to make sure there's some implementation mechanisms and strategies that we need to move forward. We aren't asking you to approve the Plan as-is today. We're looking to see if there are things that might impede approval or consensus that we can discuss today.
Task Force Meeting #30	Comm. Sharon Weissman	Port of Long Beach	03/18/24	Will we get those ahead of time so we have time to study any proposed changes?	We are meeting on April 8th and public comments ends on April 1st. I would say you should have changes for your review at least 4-5 days in advance. But let me think about that a bit further.
Task Force Meeting #30	Comm. Sharon Weissman	Port of Long Beach	03/18/24	When we get the new document will there be a sheet that highlights key changes?	Yes, we will take that as feedback that we need to make it as user friendly as possible.
Task Force Meeting #30	Fernando Gaytan	Earthjustice	03/18/24	I wholeheartedly agree with Comm. Weissman. Having a clear indication of what's changed will be really helpful. Especially if we are down to the wire and trying to review something in 5 days. One thing I heard from my colleagues at CEHAJ repeatedly is that we got in these 4 categories and their community programs, the same applies to the other 2 as well, the modal programs, we got a lot of categories that touch on different things. One thing that's missing is the overarching on public health and impacts that are going to be made, to the extent that Working Group meetings can have that embedded in what they're going to be asked to analyze and come up with startups. We need to have public health float to the top. It would be great to have that reflected here officially on how these Working Group meetings are going to actually tackle the issue of public impacts that currently exist, the potential to improve those public health outcomes through investments, and the dangers of perpetuating current harms through investments that are not fully vetted. It would be great to see that in each of these categories but certainly also perhaps its own category. One group that is laser focused on vetting those issues. You've heard that from CEHAJ repeatedly, and I know that we've got a lot of back and forth on the evaluation criteria, how it would be used, but in these working groups, it sounds like there's an opportunity there to further flesh out some of these investments. It would be great to see public health issue float to the top.	That is a very good discussion. We'll have to address that internally, but let me ask our team to think about that. I think that's something that is very much worth considering how to incorporate.
Task Force Meeting #30	Kerry Cartwright	Port of Los Angeles	03/18/24	Given the timeframe, I urge Metro to consider changing the meeting date from April 8th to allow more time for Task Force members to review. I think April 8th is too soon.	I appreciate that Kerry, we will bring that back to our management. Everything is connected to our April Board cycle.
Task Force Meeting #30	Chris Chavez	Coalition for Clean Air	03/18/24	Want to echo Fernando's comment regarding having some of the working groups' commitment oriented around public health. We know there are air quality challenges that connect back to historical disparities and issues stemming multiple decades. I think it's also important to have a public health focus as part of the implementation of this plan. We need to make sure projects are aligned with the health needs of a localized community.	Thank you for your comment. We are committed to supporting projects and programs that advance the vision and goals of the corridor, which work to improve health outcomes holistically - from air quality improvements to multimodal access to healthcare to economic and housing stability.
Task Force Meeting #30	Comm. Sharon Weissman	Port of Long Beach	03/18/24	If further analysis shows that more than 3 are beneficial and don't violate anything we've talked about in terms of widening or severe air quality impacts. Why wouldn't we do more than 3?	It could be more than 3, it depends partly on the funding we receive. 3 is a sort of place holder.  We are trying to prioritize that pipeline. Like with any of our investments, we are trying to encourage more than what we have in hand today. We definitely want to be sure that we are giving our Board the priorities in order.
Task Force Meeting #30	Comm. Sharon Weissman	Port of Long Beach	03/18/24	Clearly we have to prioritize. What I want to make certain with prioritizing is that we aren't going to remove projects that aren't as beneficial. We are just moving them down the road.	That's correct.
Task Force Meeting #30	Joe Lyou	Coalition for Clean Air	03/18/24	I really do appreciate the sensitivity to the auxiliary lane issue. There's concern about VMT on those auxiliary lanes. When it comes to VMT you have Clean Air Act transportation conformity issues that you'll have to deal with. I like the answer that Michael gave with providing context into the considerations behind your approach. Some of the interchange options I think could be more complicated. Auxiliary lanes are pretty straight forward. We know where they're going to go. In addition to considering the alternatives, you have to consider if you can so under the Clean Air Act. I agree with Commissioner Weissman that if we can make real safety improvements at more than 3 interchanges, then we should go ahead and consider more than 3 projects. One of our concerns has been that we really don't have any idea what those interchange projects look like. Obviously safety is a huge priority. With all the commitments that are being made to active transportation, Complete Streets, and those types of improvements, you can't let it all fall apart because you can't get from one side of the freeway to the other safely. I think we have to consider if we can do those kind of auxiliary projects under the Clean Air Act.	I'll ask my team to make it clear that analysis of adherence to the Clean Air Act will be one of the key questions we try to answer.  We need to go through that screening.
Task Force Meeting #30	Chris Chavez	Coalition for Clean Air	03/18/24	Has Metro looked more at what would be considered a significant increase to Vehicle Miles Traveled? Caltrans said that any projects in an MPO that creates a VMT increase in considered significant. I'd like clarification on what you're considering to be a threshold.	We have Metro staff actively working on this issue. I think we are going to have a Metro policy coming out of that effort. That to me would be very helpful so our project doesn't create an inconsistent standard. Our goal with the alternatives analysis is to provide as much information as possible. VMT will absolutely be a consideration.

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Task Force Meeting #30	Jennifer Ganata	Communities for a Better Environment	03/18/24	Can I see the slide on shifting funds again?	While you're looking at the slide, I will point out that we are disconnecting modal programs from technical assistance to allow flexibility.
Task Force Meeting #30	Jennifer Ganata	Communities for a Better Environment	03/18/24	So technical funding would be funded from something different?	It would still be funded from modal programs but as a percentage of what's left. We are going to make sure that the amount of funding in the technical assistance pot is kept at a minimum.
Task Force Meeting #30	Marisol Barajas	Long Beach Transit	03/18/24	Wardlow Offramp was a high concern for community members when it comes to safety. Why did some offramps make it on the list and others didn't? Is it based off of complete streets investments from other jurisdictions?	Part of the story is that we're trying to leverage and develop synergy with different modes. It was also a matter of trying to get to the zero-displacement outcome. At this level of design, we couldn't see how we could get to a better interchange without creating displacements that we don't want.  We are going to be fine-tuning this recommendation. We definitely appreciate feedback on corridors that will have a big transit outcome. If there's more supporting information that you would like to send us, please do so.
Task Force Meeting #30	Marisol Barajas	Long Beach Transit	03/18/24	Willow has the highest number of accidents in the corridor.	Thank for your comment. The MOSAIC freeway interchange Alternatives Analysis recommended for initial investment in the Plan will assess the most recent collision data to determine if the Willow St. interchange has the highest accident rate along the freeway.
Task Force Meeting #30	Mario Dominguez Jr.	N/A	03/18/24	Mr. Cano you are winning major points with me. Look at slide 50. All of these are major streets that run through South Gate. So you're telling me that we won't get these streets done until 2030? Is that set in stone?	Each of those arterials traverses several cities. I think we are going to want to phase it by segment so that the segments that are "easier" to implement and the cities ready to start construction would be the beginning phase. Then we would be staggering the rest over several years.  Working with the cities is going to be a key element of our planning work. We are going to need to get grant funding in consecutive cycles to implement these going forward.
Task Force Meeting #30	Chris Chavez	Coalition for Clean Air	03/18/24	I appreciate LA Metro putting together this slide (on CCA letter). So far the draft Investment Plan is certainly an improvement over 5C. I definitely want to recognize that there is improvement in that. I think you adequately explained some of the main points of our letter.	
Task Force Meeting #30	Joe Lyou	Coalition for Clean Air	03/18/24	I appreciate that you've taken the time to review and consider our letter.	
Task Force Meeting #30	Fernando Gaytan	Earthjustice	03/18/24	I have concerns' - Obviously the point of our written comments is to point out the concerns we have. I hope once you receive our letter there will be some opportunities to engage in further dialogue. Part of what we've been calling for includes community benefits programs, the allocation of improved transit, improved rider experience, active transportation projects, and ZET infrastructure. In each of those projects I think there are nuances that are important to address. We urge Metro to expand bus shelters along key routes. We have concerns about whether priority bus lanes diverts traffic into surrounding neighborhoods. On active transportation we highly encourage class 4 bike lanes only. We are concerned that this might lead to streamlining of environment processes. You will be getting a more thorough letter from us. High level concerns include that at the very last phase of this TF process, we got a quick change in how projects were being prioritized. It led us to think scoring was being skewed at the 11th hour. The plan has no unequivocal commitment to no displacement. We'd like to have that confirmed in the actual plan itself.	
Task Force Meeting #30	Jennifer Ganata	Communities for a Better Environment	03/18/24	I also wanted to uplift resident and privacy protections. We support a lot of the community focused programs in this CMIP but we caution against programs that are framed as being community support but are really increased surveillance efforts. We want to talk about centering health. I think these are concerns we've had throughout the entire process.	We look forward to the letter. I would ask what are things you think we can work on in the community program development? What are the key stumbling blocks in the way of you being able to support the Plan?
Task Force Meeting #30	Jocelyn Del Real	East Yard Communities for Environmental Justice	03/18/24	We are uplifting that we share many of these concerns. We are also part of this letter. We feel it needs a lot more to work to make it equitable. We also want to highlight funding gaps we see amongst projects especially industry backed projects versus those that directly benefit communities.	
Task Force Meeting #30	Sylvia Betancourt	Long Beach Alliance for Children with Asthma	03/18/24	I also want to lift up the point I always raise up around health. Our concerns and this project really have been around actual investments in how we're going to address health. It is not clear and well over the last two years it is something that I consistently raised. It's concerning that here we are in the late stage and it's not clearly defined. I do appreciate that Supervisor Hahn is proposing a motion to oversee funding and community programs. At the same time, I think it feels like it was not part of this Investment Plan and will be a second phase. As my colleagues in CEHAJ brought up, we have reviewed the CMIP and are going to be responding more thoroughly in a letter.	
Task Force Meeting #30	Michael Leue	Alameda Corridor (ACTA)	03/18/24	I just need a little more time to develop a position.	
Task Force Meeting #30	Hank Hsing	LA County Dept. of Public Works	03/18/24	Need more time to discuss internally.	
Task Force Meeting #30	Albertos Campos	Southeast Los Angeles Collaborative	03/18/24	We need more time to discuss internally. Curious to see how the motion with Board of Supervisors goes.	
Task Force Meeting #30	Mario Dominguez Jr.	N/A	03/18/24	This is a good plan. My city needs this. There's a lot of great shit in this plan. To the folks that have concerns, I'm sure they can be addressed. Mr. Cano can the Plan be amended as you guys proceed with it? This is something that my city desperately needs. I encourage you guys to work with Mr. Cano and his team.	The plan is a living document. We have funds reserved for future needs. I would say the community programs are also an opportunity to codesign with cities in the corridor. We'll be coming back to the Board with updates every four years or so.

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Task Force Meeting #30	Mario Dominguez Jr.	N/A	03/18/24	I desperately want this for South Gate and the surrounding cities. I'm sure you folks have your concerns but this is such a tremendous opportunity. We're talking about projects that uplift humanity and the spirit of people. The thing I want to say about the LA County Board of Supervisors is they're the drivers. The rest of us are just along for the ride. I encourage you all to consider your position and the tremendous amount of good you'd be doing by voting for this plan. LA County has turned a blind eye to South Gate and the surrounding cities.	
Task Force Meeting #30	Mario Dominguez Jr.	N/A	03/18/24	I don't trust the L.A. County Board of Scumbags. They need to get their act together and do a much better job of taking care of my city. And the surrounding cities around South Gate. The L.A. County Board of Scumbags are master ratfuckers. Ratfucking cities out of programs, projects, and services is what they do best. These goddamn soulless motherfuckers need to start proving their worth. They need to start proving their worth a damn.	Thank you for your feedback, Mario. Appreciate your concerns.
Task Force Meeting #30	Mario Dominguez Jr.	N/A	03/18/24	You're welcome. God help us.	Also thank you for attending the project meetings. I know you also showed your support for the project at the community meetings.
Task Force Meeting #30	Mario Dominguez Jr.	N/A	03/18/24	My pleasure. I do it because I care. And I want to fight for my city. And I want to see these people get shit done for all of us.	Thanks, Mario!
Task Force Meeting #30	Mario Dominguez Jr.	N/A	03/18/24	What is wrong with these people? Why can't they vote and say that they support this plan? My city needs this fucking thing too pass.	We've noted all of your comments tonight, Mario. Thanks again!
<b>EWG Meeting #16</b>					
EWG Meeting #16	Phyllis Ollison, CLC Compton		03/25/24	I saw in the presentation where the word arsenic appeared, and this is of concern. High levels of lead and arsenic appears on the related programs examples slide. How often are blood lead levels tested? How long ago was the battery recycling facility removed?	This is an important environmental justice issue. I believe Jennifer Ganata from CBE might be able to offer some additional information? Jennifer provided additional details on LA County's ongoing program to do testing and on the shutdown of the battery recycling facility.
EWG Meeting #16	Jennifer Ganata, CBE		03/25/24	LA County has a testing program. EPA is looking into corrective action for high lead levels. Battery facility closed in 2016. The Department of Toxic control-agreed to do local community clean up. Local community clean is still on going. Exide shut down completely and filed for bankruptcy. Post shutdown issues are still going involving many agencies. County, SCAQMD, still many issues.	
EWG Meeting #16	Phyllis Ollison, CLC Compton		03/25/24	What is Chromium 6? What is going on with the Hexavalent Chromium emissions exposure in Paramount and West Rancho Dominguez mentioned on this slide?	Hexavalent Chromium can happen at certain facilities. There were programs set in place in identifying facilities by the South Coast Air District that would implement controls and requirements on these facilities. The regulatory programs have worked hard on addressing the issues and the Air District is continuously looking at these facilities. The Mates V study specifically calls out hexavalent chromium. Due to the high cancer causing effects the Air District is still closely monitoring.
EWG Meeting #16	Phyllis Ollison, CLC Compton		03/25/24	There are schools in this area, which is also concerning. Were there any reports of cancer or deaths?	School districts were involved with working with the Air Districts. There was monitoring at the schools and local residences. The emissions results are coming from stationary sources and from other sources such as mobile sources. Cancer risk is calculated and public health was involved. Estimated risk using latest models, no one was going to wait for cancer risks. The cancer risks needed to be addressed immediately.
EWG Meeting #16	Phyllis Ollison, CLC Compton		03/25/24	Towards the very beginning of the presentation, the word arsenic was also there. What was that about? I'm very concerned about the air quality, especially in these underserved communities. Response tends to be slower.	Julia Lester indicated that she was a part of this early study. The arsenic threat was included with the concerns of the Exide shutdown. Arsenic and lead were looked into due to large concerns. The MATES V study includes a variety of information about these pollutants and includes spatial maps.
EWG Meeting #16	Hector de la Torre, Ex-Officio		03/25/24	Issues with community health includes environmental, population health, prevention for individuals. The GCCOG works in five areas. Transportation, housing and homelessness, economic development, environment, and health and wellness. They are looking for partners for health and wellness. There are multiple programs for air quality. SoCal REN is GCCOG-wide and the Regional Climate Collaborative covers the 710 Corridor. AB617 is used to target emissions in a defined area and create mitigations for the pollution in that area. Four of the state 19 target areas are located along the 710. There are not a lot of health or wellness initiatives collectively. There are clinic networks in Long Beach and the southeast cities that are doing good work. We have a lack of hospitals in this area.	That was a lot, thank you.
EWG Meeting #16	Alberto Campos, SELA Collaborative		03/25/24	Social determinants of health and access to health come to mind. Communities are very concerned about equitable and immediate access to healthcare, especially when it comes to asthma. Education for community health is also important. SELA Collaborative is partnered with GCCOG. Concern about the heat island effect and addressing through the tree canopy. Lower LA River Para Todos campaign looks at equitable investments in the region - SELA Collaborative is engagement arm of that campaign. This looks at the investments that are coming in on 1.5 miles on both sides of the river and what can be done to help improve the quality of life, economic justice concerns, workforce development, housing, and addressing homelessness. Climate Resolve and cool technologies/cool pavements - we were recently introduced to this topic.	Susan Ambrosini added information about cool pavements. New paving material technologies that help reduce the temperature. Susan added information about Climate Action Plans. Cities use Climate Actions Plans that address urban heat island and could be used for finding program and project ideas. Climate Action Plans go through a public outreach process and usually have a good amount of community support. Climate Action Plans from cities could be used to identify potential synergies with projects.
EWG Meeting #16	Sylvia Betancourt, LBACA		03/25/24	Issues associated with community health - children with asthma, what are barriers to health and social determinants of health. What are the ways in which our families can thrive - safe and affordable housing, clean air and water, good jobs. Central to our work is outpatient continuum of care for children - linkages to clinics along 710 corridor. Community health is not just about the absence of being healthy but about being able to thrive. We provide education to clinicians and providers. Also, I sit on the board of the LB Health Dept. and we are part of CEHAJ. Many of our organizations are connected to the Port or rail. Link to Exide and the northern part of the corridor. When we layer that on to impacts for the 710, that's a huge impact.	Thank you, it's helpful to hear about the work you've been doing in the community. Very impressive.
EWG Meeting #16	Alberto Campos, SELA Collaborative		03/25/24	We are partnering with USC-Keck Medical School on a 5-year study to identify what are the implications of adopting electric vehicles in communities like East LA. We are ready to start focus groups soon. Goal is to research the limitations, motivations, and barriers for residents on adopting electric vehicles.	We definitely want to keep tabs on that research.
EWG Meeting #16	Phyllis Ollison, CLC Compton		03/25/24	I think you said this study found that for every one electric vehicle, you reduce one trip to the ER for asthma, is that correct?	Alberto Campos responded that this was preliminary data from the USC research team. They had looked at EPA monitors in the state. They were counting how many electric vehicles in one zip code and how many asthma related ER visits.

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
EWG Meeting #16	Fernando Gaytan, Earthjustice		03/25/24	I appreciate the thoroughness of the presentation. I appreciate you uplifting community health, it needs to be at the forefront. It can be a very broad topic. I'd encourage Metro to think about community health from an equity perspective, in the context of repairing past harms and creating community benefits. Caution against adopting community programs if the community is skeptical. Can we parse these out? Call these more of an obligation instead of a benefit. Making sure we have opportunities for residents to participate in outdoor activities without further impacts. Making sure we offer for local training and hire for zero emissions. Making sure folks feel protected from displacement. CEHAJ are at the forefront at looking at health and issues in the corridor. Thanks to Supervisors Hahn and Solis, the County is looking into providing support.	Susan Ambrosini noted the broad interpretation of community health in the last few responses. Keeping the definition broad and focusing on preventative measures that contribute to community health.
EWG Meeting #16	Maria Reyes, CLC		03/25/24	My name is Maria Reyes. Last time I was part of the CLC meeting, I was very concerned about community health. I voiced my interest in clinics. It takes very long at these clinics. Security and mobility are also priorities. I also want to see air quality and zero emissions.	
EWG Meeting #16	Irma Lopez, CLC		03/25/24	My name is Irma Lopez. It's very important that these resources come to the cities in a fair way. We need action. Maybe we need air purifiers in homes and schools. The money should reflect the communities concerns to help alleviate our issues. We want the resources to be visible. The resources are given to the organizations and they are not reflected in the community, we can't see the actions or air getting cleaner. I want to be able to touch that change.	
EWG Meeting #16	Phyllis Ollison, CLC Compton		03/25/24	I worked in health care for 20 years. One of my concerns is access to health care. To me, health care is all about making sure everyone has access. Lots of people do not have access to health. Community health means that everyone has access to healthcare. This is why arsenic stuck out in the previous slide. Asthma can be resolved with clean air, clean water, and good food. High quality health, mental, and social are components of what makes up good community health.	Susan Ambrosini commented that the broad interpretation of community health is important because it touches on mental health and aspects that are not physical.
EWG Meeting #16	Tiesha Davis, CLC		03/25/24	Need to think about people who are homebound as well, how they can access the healthcare resources they need. People who have access to additional support and advocacy on their behalf.	
EWG Meeting #16	Jennifer Ganata, CBE		03/25/24	One of the programs CBE has been working on is thinking about what Just Transition looks like - stopping extractive economies, the use of fossil fuels. How do we get more folks using public transportation and how do we make public transportation more accessible? Aligns with Metro's work. One of the challenges - how do you get meaningful public participation in those spaces? This process requires a lot of time. if we put more emphasis and energy on community led solutions, we could have more progress in thinking about active transportation in SELA, how do we move away from emphasis of having a car. We can center communities in those conversations, it demands a huge cultural shift. Including disability justice issues, energy justice issues - those are opportunities for Metro in the Corridor beyond just looking at what the 710 can do.	
EWG Meeting #16	Sylvia Betancourt, LBACA		03/25/24	The major challenge for us is a question of addressing the source of the pollution. When children go home from the ER, they go back to a home/neighborhood/school where they continue to breathe dirty air. How do we protect children and their health with continued exposure to pollution? Beyond that, there's always capacity and funding, like any organization that relies on funding. But more than anything, the challenge is addressing the problem at its source. Principally, really is about protecting children from continued exposure to pollution after leaving the hospital.	Susan Ambrosini commented that future meetings will explore this question.
EWG Meeting #16	Marlin Dawoodjee Vargas, LBACA		03/25/24	A challenge that I've noticed - we are very community based, on the ground doing the work. when we're doing more technical work, or working on policy, lack of meaningful community engagement has really been an obstacle. If these are centered around being for community, it's critical that they are involved every step of the way. A clear understanding of how their input is being acknowledged and addressed through the project, and how it's being addressed at the root cause. Continuing community engagement where community members are actively participating and have their opinions being heard.	Susan Ambrosini commented that future meetings will explore this question.
EWG Meeting #16	Janeth Preciado Vargas, CBE		03/25/24	As an organizer, a lot of my job is plugging in youth and the community generally. I've noticed that it's hard to digest a lot of text or materials, especially with the Investment Plan. I'd be interested in looking at/reviewing materials and making sure they are community-friendly.	Susan Ambrosini had commented on how to better define the roles and interest for future working group meetings.
EWG Meeting #16	Irma Lopez, CLC		03/25/24	It is very important for me to learn more about each role and decide how my input would be most productive. will need more time to think about it, but thank you	
EWG Meeting #16	Sylvia Betancourt, LBACA		03/25/24	I'm a little nervous about making any commitments. I wish this conversation would have happened earlier in the process. I want to make sure that what we had envisioned really does happen. When we look at the roles, we want to be involved in everything. Ensure that the program is well designed and involves colleagues that have experience in these areas. Hard to make a commitment not knowing what the working groups will involve, but lean towards leading or collaborating.	
EWG Meeting #16	Sylvia Betancourt, LBACA		03/25/24	KeAndra: What other information would be helpful in making the decision of whether to participate? Sylvia: How often these meetings will take place, whether it will be virtual or in person? Will there be a timeline? Is there a beginning and end point, so we know what we're working toward?  My initial thoughts on merging air quality and environment - I would want there to be a specific emphasis on Health, but will need to give that more thought. I really appreciate how you're facilitating this meeting sort of like a focus group, but will need to give these more thought.	Susan Ambrosini asked the attendees what they prefer in terms of format for the working group. Do they want in-person or online, and if the meetings should be held during the day or evening. Susan asked if this should be an established membership or open participation format. She also asked the group about whether the Air Quality and Health Working Group should merge with the Environment Working Group.
EWG Meeting #16	Maria Reyes, CLC		03/25/24	I was thinking about the working groups. These will reinforce how we can advocate for projects that were not included or things we wanted to see in the investment plan.	

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
EWG Meeting #16	Fernando Gaytan, Earthjustice		03/25/24	Just a thought - some of the apprehension we may be hearing may be related to, again, the fact that folks are still combing through the 200+ page investment plan carefully, and wanting to provide thorough analysis on the projects that are being proposed. Part of the working group structure may be some unequivocal clarity that by participating in these Working Group meetings you aren't inherently endorsing everything in the Investment Plan or the programs that are currently on the list.	Michael Cano responded that they recognize they are bringing on people with different viewpoints. By participating, attendees are not signing off on every single item that is happening. They are trying to gather the right voices and expertise in helping to bring good recommendations, funding opportunities and strategies.
EWG Meeting #16	Marlin Dawoodjee Vargas, LBACA		03/25/24	Referring to the first question, I think having an established membership would allow us to have a core group. But having it open to the public would also be helpful to have it centered on community engagement.	
EWG Meeting #16	Jennifer Ganata, CBE		03/25/24	Here is the DTSC website on the Exide cleanup <a href="https://dtsc.ca.gov/exide-home/">https://dtsc.ca.gov/exide-home/</a>	
EWG Meeting #16	Jessica Medina		03/25/24	Here is the LACDPH site: <a href="http://publichealth.lacounty.gov/eh/chromium6/">http://publichealth.lacounty.gov/eh/chromium6/</a>	
EWG Meeting #16	Jennifer Ganata, CBE		03/25/24	<a href="http://publichealth.lacounty.gov/lead/">Here is information on lead safety from LA County http://publichealth.lacounty.gov/lead/</a>	
EWG Meeting #16	Jennifer Ganata, CBE		03/25/24	<a href="https://www.epa.gov/lead/final-strategy-reduce-lead-exposures-and-disparities-us-communities">This is the Federal EPA's guidance on reducing lead https://www.epa.gov/lead/final-strategy-reduce-lead-exposures-and-disparities-us-communities</a>	
EWG Meeting #16	Hector De La Torre, TF Ex-Officio		03/25/24	CARB approved a phaseout of all decorative Hex Chrome facilities over the next few years.	
EWG Meeting #16	Aryeh Cohen		03/25/24	Thanks for sharing this info, Jennifer and Hector!	
EWG Meeting #16	Phyllis Ollison, CLC		03/25/24	Thanks for the links Jennifer. Thanks for the update Hector.	
EWG Meeting #16	Alberto Campos, SELA		03/25/24	<a href="https://www.climateresolve.org/">https://www.climateresolve.org/</a>	
EWG Meeting #16	Hector De La Torre, TF Ex-Officio		03/25/24	Reflective surfaces for roofs and cool pavement to reduce the heat island effect, 1-2 degrees	
EWG Meeting #16	Jennifer Ganata, CBE		03/25/24	I would also look into your city's EJ Element (SB 1000)	
EWG Meeting #16	Alberto Campos, SELA		03/25/24	<a href="https://www.myvotemyhealth.org">Another campaign SELA Collaborative Supports: https://www.myvotemyhealth.org</a>	
EWG Meeting #16	Alberto Campos, SELA		03/25/24	<a href="https://vialeclimateconnections.org/2023/09/Electric-vehicles-may-improve-a-communitys-health/">Electric Vehicles may improve a community's health https://vialeclimateconnections.org/2023/09/Electric-vehicles-may-improve-a-communitys-health/</a>	
EWG Meeting #16	Alberto Campos, SELA		03/25/24	I have to jump to another meeting. Thank you for this fruitful discussion.	
EWG Meeting #16	Tiesha Davis, CLC		03/25/24	I think people need to see beyond the 710 and into the communities	
EWG Meeting #16	Tiesha Davis, CLC		03/25/24	Question 1 Response: 1-Collaborate 2-Lead 3-Advocate  Question 2 Response: 1-Collaborate 2-Lead 3-Advocate	
EWG Meeting #16	Phyllis Ollison, CLC		03/25/24	I'm unable to determine my role without knowing the subject matter. Evening [meetings are preferred]	
EWG Meeting #16	Sylvia Betancourt, LBACA		03/25/24	Day time meetings are preferred	
EWG Meeting #16	Tiesha Davis, CLC		03/25/24	Question 3: I agree with the speaker. Also established then open once things are finalized.	
<b>CLC CMIP Workshop</b>					
CLC CMIP Workshop, Table 2	Guadalupe Arellano		03/22/24	With the name Corridor Mobility Investment Plan, it's not really an investment plan. We have a huge history with pollution, the increase in traffic. There's a lot to reckon with. This doesn't feel like a reparation.	"Investment Plan" derived from state requirement to get funding for congested corridors. You have to have a comprehensive CMCP (corridor mobility comprehensive plan). We can name it something else, but submit it still as meeting the CMCP requirements.
CLC CMIP Workshop, Table 2	Dan Wamba		03/22/24	I kind of get bogged down in the community based improvements which look very powerful in the report. There's a whole list of things. I don't yet have a tangible feel for the community programs. It would help if there were examples to point to.	
CLC CMIP Workshop, Table 2	Guadalupe Arellano		03/22/24	Where I see charging infrastructures in the community, they have been vandalized. The data isn't supporting what's happening.	
CLC CMIP Workshop, Table 2	Dan Wamba		03/22/24	What about off road vehicles? I was looking at a video today that said about 30% of emissions are from bulldozers, bobcats, etc.	The state has a requirement that off road equipment will have to get clean. Our plan doesn't specifically point that out because it's a state regulation. It's kind of a background condition. Perhaps we should point that out in our final document.
CLC CMIP Workshop, Table 2	Guadalupe Arellano		03/22/24	You should also point out the sites for these charging station infrastructures.	The process of identifying sites is going to be done in tandem with communities. They need to be in places that don't harm the community but also in convenient enough places for truckers to use them.
CLC CMIP Workshop, Table 2	Guadalupe Arellano		03/22/24	Do we have a funding source for the programs covered in Supervisor Hahn's/board of supervisor motion?	I don't believe specific funds have been identified for that yet.  The community programs, the money we're providing is a catalyst. There's funding we know is controlled by local cities, funding provided by regional partners. The goal is to use the funding we have so that each program has a clear mission, clear approaches, data planning, etc. so that each program is self sustaining. We don't want them reliant on Metro money because so many programs won't qualify. It's why the County is such an important partner because they bring funding we can use. Our plans are usually just transportation focused. We're going to take an active role of bringing everyone to us so that funds can go farther.
CLC CMIP Workshop, Table 2	Guadalupe Arellano		03/22/24	How are the working groups going to be involved in community programs?	Participants are going to be expanded. LA Health County currently, for example, isn't involved in our Task Force, but they will be invited into the working groups as strategic partners. Local cities will be brought in as well since they will fund many of these programs (especially those that deal with land ownership). We have all the experience in the world for the transportation programs, we need partners for these programs.
CLC CMIP Workshop, Table 2	Dan Wamba		03/22/24	I appreciate that your scope for the community programs is looking out towards potential partners.	We want to develop a special relationship between opportunities with the Ports/workforce development/etc. and the Corridor residents. We want opportunities to be geared towards residents versus just an open call.

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
CLC CMIP Workshop, Table 2	Guadalupe Arellano		03/22/24	What will the working groups be like?	Right now the working groups are open. We don't want to be excluding people. We aren't quite sure what each working group is going to look like. We are open to feedback in terms of how to structure the working groups. What is the structure, what is the charter, what is the mission? We will need to define these things.  In the Plan, the working groups are a kernel of an idea  The CMIP establishes the basis of the working groups and that once the Plan is adopted, Metro will go forth and figure out how to implement the groups.
CLC CMIP Workshop, Table 2	Dan		03/22/24	The working groups should be diverse.	I think that's something we can make explicit. We're excited about tapping into a lot of good things that are happening in the Corridor.
CLC CMIP Workshop, Table 2	Dan		03/22/24	Talking through the community programs and working groups makes me more comfortable with it.	
CLC CMIP Workshop, Table 2	Dan		03/22/24	Community programs don't lend themselves as well to tools like the Dashboard. There's a lot to it.	
CLC CMIP Workshop, Table 2	Garate		03/22/24	I'm learning a lot from this discussion and listening to everyone's perspectives.	
CLC CMIP Workshop, Table 2	Guadalupe		03/22/24	The heat maps are a good visual summary of the needs of the Corridor	The map also only shows the number of projects, not the cost/funding.
CLC CMIP Workshop, Table 2	Tiesha		03/22/24	I can't fully jump on board because I'm from San Pedro and we only have one project. The way the money is going to be invested feels one sided. I advocated the entire time to change things for San Pedro and it was overlooked.	When you say just 1, is that with the understanding that there are 16 or so projects that impact San Pedro positively?
CLC CMIP Workshop, Table 2	Tiesha		03/22/24	I'm not sure I know that San Pedro has so many positive projects.	Amber showed Tiesha the list of San Pedro projects.
CLC CMIP Workshop, Table 2	Tiesha		03/22/24	Overall the Investment Plan is fine, to my knowledge.	
CLC CMIP Workshop, Table 2	Dan		03/22/24	It's a thumbs up from me. The breadth of the Plan is amazing.	
CLC CMIP Workshop, Table 2	Alfonso		03/22/24	I am all for whatever helps our communities. The Plan looks good.	
CLC CMIP Workshop, Table 2	Guadalupe		03/22/24	Historically, I look back to our first meeting. Environmental impact was not addressed again. I would say 2016 is when they last tried to propose the revitalization of the 710 and we had to advocate against it. There was a huge environmental impact report that was done that we never got to see. Waiting a year, waiting 2 years, waiting 20 years is not going to help the people who are living with illnesses right now.	Are there things you would like to see changed? Or is it things you'd like to speed up?
CLC CMIP Workshop, Table 2	Guadalupe		03/22/24	Humphries bridge is dirty, there's trash strewn everywhere. The Plan says they want to extend it and that's going to impact freeway traffic.	
CLC CMIP Workshop, Table 2	Tiesha		03/22/24	How would you put a bridge back? That's going to cost more money. My biggest thing is how will the bridges be maintained?	
CLC CMIP Workshop, Table 2	Guadalupe		03/22/24	Expanding Humphries Bridge is not going to suit the residents.	My understanding of the project is widening the bridge to add sidewalk and bicycle lanes only.
CLC CMIP Workshop, Table 2	Guadalupe		03/22/24	By expanding or widening the Humphries Bridge, it gives more space to trucks.	We'll check, but my understanding of the project is that it is only for pedestrian and bicycle traffic.
CLC CMIP Workshop, Table 2	Guadalupe		03/22/24	I would rather see the Humphries Bridge money spent elsewhere. Widening the bridge won't clean it up. You can widen it as big as you want, some things are not going to change.	
CLC CMIP Workshop, Table 3	Kevin Shin		03/22/24	The 3 recommended added projects-how do they affect the budget numbers?	
CLC CMIP Workshop, Table 3	Sinetta Farley		03/22/24	When the recommendations are presented to the Metro Board. Will there be \$ amounts tied to the initial recommendations? Will we see that before?	
CLC CMIP Workshop, Table 3	Sinetta Farley		03/22/24	My priority is my community. I have a lot of issues in my community (East Rancho Dominguez/Compton). My apologies. You've got to take care of your home first. I missed a couple of meetings.	
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	I don't have specific questions about the working groups. I am interested in seeing how they move forward. And to participate.	
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	I'm afraid I have a vision for a project, which is why I asked for Long Beach Boulevard and Atlantic last time. I picture Long Beach Blvd. having a bike lane, a bus lane, but the reality is the way the street exists, it's not going to happen. I'd like to understand what these projects will look like at the end of the day. This is a concern of mine. Reading about them is one thing. Visualizing them is another thing.	
CLC CMIP Workshop, Table 3	Dora Cervantes		03/22/24	If they implement bike lanes-fire and ambulance won't have enough space to move forward to the accident location. There will be a conflict with the traffic and the bike lanes.	
CLC CMIP Workshop, Table 3	Kevin Shin		03/22/24	Those complaints aren't valid. Fire trucks are able to roll over all infrastructure. They can use bike lanes. Even if there are dividers. There isn't significant impact. The goal is to encourage more people to not drive. Give people alternative options to driving.	
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	What about a 2 way bike lane?	
CLC CMIP Workshop, Table 3	Kevin Shin		03/22/24	It would be double the width.	
CLC CMIP Workshop, Table 3	Dora Cervantes		03/22/24	In some places, they put a divider. You cannot go over. If you are driving you cant move to the right.	
CLC CMIP Workshop, Table 3	Kevin Shin		03/22/24	The fire trucks can roll over those. The design of these materials. They are intended to be run over by emergency vehicles.	
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	There is an element of coordination too.	Minimum clearance requirements. Minimum width requirements. You can't design something that would make it impossible for an emergency vehicle to turn, move through.
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	Long Beach Blvd. is a freight corridor. The lanes need to be a certain width to accommodate trucks.	
CLC CMIP Workshop, Table 3	Dora Cervantes		03/22/24	I live near Long Beach Boulevard. I noticed they are renovating in the median. They are taking space where one will drive.	
CLC CMIP Workshop, Table 3	Sinetta Farley		03/22/24	In Long Beach, there is a median from Anaheim to Ocean in downtown.	
CLC CMIP Workshop, Table 3	Sinetta Farley		03/22/24	Curious about projects in East Rancho Dominguez. Alondra off the 710. (Project 0120)	
CLC CMIP Workshop, Table 3	Kevin Shin		03/22/24	The presumption is that the jurisdictions will work with Metro on these projects.	Some cities will have resources to assist. With this effort, we can think about ways to help cities work with Metro towards implementation.

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
CLC CMIP Workshop, Table 3	Sinetta Farley		03/22/24	I'm thinking about an LA County Project that is being implemented in Compton. We're concerned in E Rancho Dominguez. The county has a lot of money, but city of Compton doesn't. We are looking at whether where county will complete the area. Compton Boulevard. City will do its part, and county will do its part. We are looking to see if this is going to happen.	Start up Fund-help jurisdictions that need capacity.
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	Will Metro step up for the city. (re Technical Assistance)	It will come in different ways. Metro may pay for a consultant to assist. Metro may assist directly. A lot of time-TA is fcfs. This is not the case for this fund. Combination of direct staff and consultant resources. We are looking to working groups to help shape this.
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	Referred to map (the darker the color) cities that need more help?	Green outline -communities -EFC's. Still very much in the air. Cumulative impact - high asthma, etc. This is still very much an open discussion. Another criteria-community may have corridor wide projects, but not specific projects for community.
CLC CMIP Workshop, Table 3	Esmeralda Hernandez		03/22/24	How much are we investing in green space? Where we will see this?	Some complete streets projects include greening. Community Programs-separate urban greening. In Community Working Groups-urban greening project funding within funding of projects.
CLC CMIP Workshop, Table 3	Esmeralda Hernandez		03/22/24	Atlantic off the 710. Those trees are always on fire. They are palm trees-don't provide shade.	Urban Heat Island --- tree canopy is of focus. Engineered soil-expand tree well. Movement-how to make trees thrive in an urban environment.
CLC CMIP Workshop, Table 3	Kevin Shin		03/22/24	Re Urban Greening. Is there a more holistic approach-trees, inclusion of bios wells. Is there a standard -new projects? As opposed to previous funded projects?	Usually built into funding. Urban Greening Program-might be a good opportunity to work with cities-tree requirements.
CLC CMIP Workshop, Table 3	Esmeralda Hernandez		03/22/24	Will we be seeing a draft of that? How much Green Space is anticipated amongst the investment projects?	For projects that have a design for, we can see this. For modal projects-haven't been designed. CLC and public will be able to shape the project. Consistent w sustainability and greening principles. That's why it is important we remain involved. Timeline will vary. We can potentially have this for the initial investment projects.
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	Is there a minimum tree size that Metro has? Tree that's a stick and then it dies. Metro have a rule?	Tree replacement policy. Some direction-implement trees that are taken down by Metro. Jurisdictions may not necessarily follow policy. This can be part of the community program designs. Sometimes more small trees will be planted.
CLC CMIP Workshop, Table 3	Kevin Shin		03/22/24	Argument is that most of these jurisdictions wont be able to maintain trees.	
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	There is no mechanism for the finance to plant a certain gallon tree?	There is a minimum box/tree size for the development. Trees will get maintained by private property owner adjacent. With exception of city property-city must maintain.  2022. Metro adopted tree policy. 2 for 1 (take down 1 plant 2), Parklets. If project isn't able to commit, fee. Community Engagement is required. Private/public partnerships-maintenance.
CLC CMIP Workshop, Table 3	Dora Cervantes		03/22/24	City of Vernon-city was giving homeowners trees. City staff came to our homes to plant the trees.	
CLC CMIP Workshop, Table 3	Esmeralda Hernandez		03/22/24	Where I live they put a concrete park in South Gate going into Downey. Stick trees. Decorate. Our community has asthma. We're putting more concrete down. This isn't helping.	
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	I work in the dept w the guy that plants trees in LB. They need certain amount of water the first couple of years. But if they aren't maintained, they die.	
CLC CMIP Workshop, Table 3	Marcos Lopez		03/22/24	It would be neat to help cities maintain trees.	
CLC CMIP Workshop, Table 3	Esmeralda Hernandez		03/22/24	Holding meetings to let community know they can help maintain trees would be helpful.	
CLC CMIP Workshop, Table 4	Marlene Sanchez		03/22/24	Why don't they use simpler words? Too many technical words.	That's why we're here, to clarify.
CLC CMIP Workshop, Table 4	Marlene Sanchez		03/22/24	Porque usamos la palabra "cariles"	
CLC CMIP Workshop, Table 4	Maria Reyes		03/22/24	You have heard us but, Some projects have not been taken in consideration like 0158 Project, Del Amo. have been dreaming of change for 30 years. mas importancia en el movimineto de mercancia. Los carriles en el 710 auxilaries que es tu contexto. Van a reorganizar los existentes? 405 a 710 - esta feo. not enough room to merge to freeways. Thank you for listening because we are collaborating together with these challenges on the freeways. (La 103 tambien los carriles.) WE have the experience, we have the knowledge, we have lived everywhere, we know what makes us sick, we're living it.	
CLC CMIP Workshop, Table 4	Irma Lopez		03/22/24	is what way can money be out in organizations to sustain public health. If they will be monitoring public health with these projects. The CLC deserves the money, there's no improvement in the air. Where is the money going? I'm very considered about public health.	Working groups is the answer and that's what Metro is supporting. Metro is putting about 40M to support cities like Bell Gardens, etc. This is how its going to be supported and adding these groups to implement concerns of the CLC. How are we going to protect these concerns? (working groups) Every step you will be able to see, we will be giving you all emails about any changes and where the money is going. We expect you to see how we work and reply because it is a project you were concerned about.
CLC CMIP Workshop, Table 4	Maria Reyes		03/22/24	Can the money go to employ people in the community?	
CLC CMIP Workshop, Table 4	Maria Reyes		03/22/24	They don't give us nothing for our time at USC or UCLA when we join them for events.	a good percentage can be trained to organize these programs. (workforce development)
CLC CMIP Workshop, Table 4	Yesnia Lopez		03/22/24	In Bell, we need lights near the bridge, I live near 710. My glass windows is full of black particles. I have asthma. we went to an event and these people said that there needs more bike lanes, they have run them over already. Talk to the youth too so they can tell you what they need in their community.	
CLC CMIP Workshop, Table 4	Esdira Leva		03/22/24	There's a lot pollution. The cars are full of black particles. My daughters have been suffering from asthma. We didn't know there was so much pollution years ago. I would love there not to be some contamination. In the 710, (it's Florence entrance) is so dangerous to merge in.	
CLC CMIP Workshop, Table 4	Irma Lopez		03/22/24	Emphasis on electric vehicles, no more diesel and gas cars. Regarding displacement, so that we can't lose our homes,	
CLC CMIP Workshop, Table 4	Maria Reyes		03/22/24	In every tree in Long Beach, when they take them off they replant them.	Every city they have to see every regulation where money goes to. If they are taking money, Metro has to see where the money goes.
CLC CMIP Workshop, Table 4	Luis Mesa		03/22/24	Where is 50M going to (Florence Ave bridge)? Is it only going to the bridge or all the corridor? The Gage Avenue bridge-- is that project being included with this one? Is that going to be temporary fix for the Gage bridge? These projects take so much. How long will they take? Why do they take so long? Too many times we see that many projects are not taking long and not being fixed, they see other people's salaries and they don't see the projects being done.	
Phone					

Source	Stakeholder Name	Organization/ Affiliation	Date	Comments	Response
Hotline	Unknown	Vista Veranda Senior Living (Resident)	03/12/24	Cannot join the Paramount meeting, but he wanted to let us know that his priority is affordable housing, which is needed in Long Beach and the area.	N/A (M. Cano attempted returning call but living center could not track down resident)
<b>CBO-Led Meetings/Events</b>					
Tower of Faith Evangelistic Church Me	Michelle Easley		03/03/24	Is train maintenance being addressed? Is train safety/security being addressed?	
Tower of Faith Evangelistic Church Me	Anonymous Attendee		03/03/24	I am concerned about the land / space it will take for electrical recharge stations. Can you provide more information about roundabouts? (traffic circles) - it seems to separate the street and all the concrete would take away from the flow of traffic.	
Tower of Faith Evangelistic Church Me	Anonymous Attendee		03/03/24	Please fix the streets and have clean and secure bus stops.	
Tower of Faith Evangelistic Church Me	Anonymous Attendee		03/03/24	What is the money spend to make trains safer?	1) slower, 2) quad gates, 3) more notification/signals to alert the train is approaching, 4) there will be more meetings for Blue Line projects
Tower of Faith Evangelistic Church Me	Anonymous Attendee		03/03/24	Will there be sheriffs on the buses?	1) Metro will have transit security, 2) BOD will determine Sheriff/LAPD involvement, 3) Ambassador program
Tower of Faith Evangelistic Church Me	Anonymous Attendee		03/03/24	I used to be a train rider, but maintenance was an issue. The blue line broke down a lot. Will money go towards maintenance?	1) money is going towards capital improvements / new equipment. 2) "New Blue" project (from years ago) made these improvements
Tower of Faith Evangelistic Church Me	Anonymous Attendee		03/03/24	What's going to stop homeless from riding on trains? Mental health, transportation, and security are issues	There will be more staff offering services to help, not enforcement
Tower of Faith Evangelistic Church Me	Anonymous Attendee		03/03/24	Security should stop people from sleeping and riding end-to-end on trains	Metro can't kick people off the train that paid, only at the end of the line
Tower of Faith Evangelistic Church Me	Anonymous Attendee		03/03/24	Who will be getting jobs for these projects?	Metro is making an effort to hire from the local community / workforce development programs
Tower of Faith Evangelistic Church Me	Anonymous Attendee		03/03/24	How will Metro make it safer for people to ride the bus?	Answered similarly above



# Letters Received and Metro Response Letters



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LONG BEACH - EAST LOS ANGELES CORRIDOR MOBILITY INVESTMENT PLAN



# Letter from Port of Los Angeles



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LONG BEACH - EAST LOS ANGELES CORRIDOR MOBILITY INVESTMENT PLAN

**From:** "Cartwright, Kerry" <[KCartwright@portla.org](mailto:KCartwright@portla.org)>

**Subject:** LA-ELA CMIP

**Date:** March 18, 2024 at 3:28:13 PM PDT

**To:** "Cano, Michael" <[canom@metro.net](mailto:canom@metro.net)>

**Cc:** "[Sharon.weissman@polb.com](mailto:Sharon.weissman@polb.com)" <[Sharon.weissman@polb.com](mailto:Sharon.weissman@polb.com)>, "Grubbs, Michele" <[mgrubbs@pmsaship.com](mailto:mgrubbs@pmsaship.com)>, Thomas A. Jelenić ([tjelenic@pmsaship.com](mailto:tjelenic@pmsaship.com)) <[tjelenic@pmsaship.com](mailto:tjelenic@pmsaship.com)>, Matt Schrap <[matt@harbortrucker.com](mailto:matt@harbortrucker.com)>, "[chris.wilson@bizfed.org](mailto:chris.wilson@bizfed.org)" <[chris.wilson@bizfed.org](mailto:chris.wilson@bizfed.org)>, "Hilary Norton ([hilary@fastlinkdtla.org](mailto:hilary@fastlinkdtla.org))" <[hilary@fastlinkdtla.org](mailto:hilary@fastlinkdtla.org)>

Michael,

Attached are edits/comments on the draft CMIP:

- As info, for workforce development, see attached planned POLA-POLB Goods Movement Training Campus project info, that should be added to the doc
  
  - Also, specific recommendations and required edits attached
- As verbalized several times, the following should be removed: congestion pricing, ZET lanes/travel zone restriction due to CARB ACF and ACT soon to be in full effect (CARB awaiting EPA waiver)
- The Alameda Corridor “electrification” is not viable, and has been studied several times over decades; H<sub>2</sub>-fuel cell technology may eventually be the technology for long-haul; the document should merely denote studying ZE tech for locomotives and not make a specific notation about the AC;

Kerry Cartwright, P.E.  
Director of Goods Movement  
310-357-4996 (cell), 310-732-7702

## Notice of Preparation/Initial Study

# Port of Los Angeles and Port of Long Beach Goods Movement Workforce Training Facility

*Prepared By:*

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Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, CA 90731



with assistance from:

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February 2024

APP# 220324-067

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# Contents

	<u>Page</u>
<b>1.0 PROJECT OVERVIEW AND BACKGROUND.....</b>	<b>1-1</b>
1.1 California Environmental Quality Act Process .....	1-2
1.2 Document Format.....	1-3
<b>2.0 PROJECT DESCRIPTION.....</b>	<b>2-1</b>
2.1 Project Overview .....	2-1
2.1.1 Project Location .....	2-1
2.1.2 Proposed Site Plan .....	2-4
2.1.3 Existing Site Conditions .....	2-6
2.1.4 Project Background and Objectives.....	2-7
2.2 CEQA Baseline .....	2-9
2.3 Project Description .....	2-9
2.3.1 Construction.....	2-9
2.3.2 Operation.....	2-13
<b>3.0 PROJECT PERMITS AND APPROVALS .....</b>	<b>3-1</b>
<b>4.0 INITIAL STUDY CHECKLIST .....</b>	<b>4-1</b>
4.1 Environmental Factors Potentially Affected.....	4-3
4.2 Determination .....	4-4
4.3 Environmental Checklist.....	4-5
<b>5.0 ENVIRONMENTAL ANALYSIS.....</b>	<b>5-1</b>
5.1 Aesthetics.....	5-1
5.2 Agriculture and Forestry Resources .....	5-3
5.3 Air Quality.....	5-4
5.4 Biological Resources .....	5-6
5.5 Cultural Resources .....	5-9
5.6 Energy .....	5-10
5.7 Geology and Soils .....	5-12
5.8 Greenhouse Gas Emissions.....	5-16
5.9 Hazards and Hazardous Materials .....	5-16
5.10 Hydrology and Water Quality.....	5-20
5.11 Land Use Planning .....	5-24
5.12 Mineral Resources .....	5-25
5.13 Noise .....	5-26
5.14 Population and Housing .....	5-28
5.15 Public Services .....	5-29
5.16 Recreation .....	5-32
5.17 Transportation .....	5-32
5.18 Tribal Cultural Resources.....	5-35

5.19	Utilities and Service Systems .....	5-36
5.20	Wildfire .....	5-39
5.21	Mandatory Findings of Significance .....	5-40
<b>6.0</b>	<b>PREPARERS AND CONTRIBUTORS .....</b>	<b>6-1</b>
6.1	Los Angeles Harbor Department.....	6-1
6.2	Aspen Environmental Group Team .....	6-1
<b>7.0</b>	<b>REFERENCES.....</b>	<b>7-1</b>

## Figures

Figure 2-1.	Project Location.....	2-2
Figure 2-2.	Proposed Site Plan.....	2-5
Figure 2-3.	CalGEM Well Finder Results.....	2-7

## Tables

Table 2-1.	Anticipated Training Equipment.....	2-14
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## Appendix

Appendix A: 2022 LADOT TAG Plan Consistency Worksheet

## Acronyms and Abbreviations

AB	Assembly Bill
APN	Assessor's Parcel Number
BMP	best management practice
Caltrans	California Department of Transportation
CCC	California Coastal Commission
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CII	Commercial, Industrial, and Institutional
CNEL	Community Noise Equivalent Level
CY	cubic yards
DOC	California Department of Conservation
DRO	diesel range organics
DTSC	California Department of Toxic Substances Control
ECOS	Environmental Conservation Online System
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FY	Fiscal Year
GHG	greenhouse gas
HCP	Habitat Conservation Plan
HP	horsepower
H RTP	High Road Training Partnership
IGP	Industrial General Permit
ILWU	International Longshore & Warehouse Union
IS	Initial Study
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAHD	Los Angeles Harbor Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	Los Angeles Sanitation and Environment
LEED	Leadership in Energy and Environmental Design
MRO	Motor oil range organics
NCCP	Natural Community Conservation Plan
No.	Number
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
PMA	Pacific Maritime Association
PMP	Port Master Plan
RWQCB	Regional Water Quality Control Board
SR	State Route
SWIRP	Solid Waste Integrated Resources Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TIWRP	Terminal Island Water Reclamation Plant
TPH	Total petroleum hydrocarbons
U.S.	United States
USACE	US Army Corps of Engineers
USEPA	US Environmental Protection Agency
USGS	US Geological Survey
VMT	vehicle miles traveled

# NOTICE OF PREPARATION/INITIAL STUDY

Pursuant to the California Environmental Quality Act (Division 13, Public Resources Code)

## 1.0 PROJECT OVERVIEW AND BACKGROUND

This Notice of Preparation (NOP)/Initial Study (IS) is to inform responsible and trustee agencies, public agencies, and the public that the Los Angeles Harbor Department (LAHD), as the Lead Agency under the California Environmental Quality Act (CEQA), has independently determined that potential significant environmental impacts may be associated with the proposed Port of Los Angeles and Port of Long Beach Goods Movement Workforce Training Facility (Workforce Training Facility or Proposed Project), and an Environmental Impact Report (EIR) is required. The Proposed Project would include the construction and operation of a training facility for current and future workers in the maritime and goods movement industries at the Ports of Los Angeles and Long Beach. The Proposed Project site is comprised of approximately 30 acres and is located in the northern portion of the Port of Los Angeles (Port or POLA), adjacent to and north of Anchorage Road, west of State Route (SR)-47 and North Henry Ford Avenue, and east of Shore Road, in the community of Wilmington within the City of Los Angeles, California. LAHD has prepared, as part of this NOP, an Initial Study Checklist for the EIR determination in accordance with current City of Los Angeles Guidelines for the Implementation of the California Environmental Quality Act of 1970 (Article I); the State CEQA Guidelines (Title 14, California Code of Regulations); and the California Public Resources Code (Section 21000, et seq.). The Initial Study Checklist is attached to this NOP for public review and comment.

LAHD administers the Port under the California Tidelands Trust Act of 1911 and the Los Angeles City Charter. LAHD develops and leases Port property to tenants who operate the facilities. The Port provides a major gateway for international goods and services. The Port includes 23 major cargo terminals, including dry and liquid bulk, container, breakbulk, automobile, and passenger facilities. In addition to cargo business operations, the Port is home to commercial fishing vessels, shipyards, boat repair facilities, and recreational, community, and educational facilities.

The Proposed Project's construction would include the following activities: site preparation such as grading, compacting, and paving as well as construction of buildings, utilities, a substation, and accessory structures to support workforce training activities.

The Proposed Project's operations at the training facility would include providing skilled training programs that would replicate goods movement environments such as the use and operation of ship-to-shore (STS) cranes, transtainers, top handlers, side picks, forklifts, and heavy lifts, while providing a safe training environment for workers. A facility operator would likely operate the Proposed Project as a workforce training facility to educate the current and future workforce on maritime and goods movement industries that serve the San Pedro Bay Port Complex (Port of Los Angeles and Port of Long Beach, collectively). This would be the first training facility in the United States dedicated specifically to the goods movement sector as a whole, including training

for longshore, trucking, and warehouse occupations. LAHD would enter into a long-term entitlement at the Proposed Project site with a training facility operator to be identified in the future. For the analysis in this Initial Study Checklist, the Proposed Project is assumed to be in operation for 30 years.

## **1.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT PROCESS**

This document was prepared in accordance with CEQA (California Public Resources Code, Section 21000 et seq.), the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.), and the City of Los Angeles CEQA Guidelines (City of Los Angeles, 2006). One of the main objectives of CEQA is to disclose the potential environmental effects of proposed activities to the public and decision-makers. CEQA requires that the potential environmental effects of a project be evaluated prior to implementation. Under CEQA, the lead agency is the public agency with primary responsibility over approval of a proposed project. Pursuant to Section 15367 of the CEQA Guidelines (14 CCR 15000 et seq.), LAHD is the lead agency for the Proposed Project. As the lead agency, LAHD must complete an environmental review to determine if implementation of the Proposed Project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, this NOP/IS has been prepared to assist in making that determination in accordance with California Public Resources Code Section 21153, State CEQA Guidelines Section 15063, and the City of Los Angeles CEQA Guidelines.

This NOP/IS, along with public comments received during the scoping period, will determine what environmental issue areas may be adversely affected by the Proposed Project. These issue areas will be assessed in the Environmental Impact Report (EIR) prepared for the Proposed Project. The EIR will determine the nature and extent of any potential environmental impacts and establish any necessary and appropriate mitigation measures. The EIR will also include an evaluation of alternatives to the Proposed Project that would reduce or avoid significant impacts, including a No Project Alternative. A preliminary evaluation of the potentially affected environmental issues is included in Section 5.0, Environmental Analysis.

Consistent with State CEQA Guidelines Section 15082(a)(1), LAHD has identified the following potentially significant environmental effects of the Proposed Project, which will be addressed in the EIR: Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use Planning, Noise, and Transportation.

In accordance with CEQA and the State CEQA Guidelines, this NOP/IS will be circulated for a period of 45 days for public comment and scoping. The public comment period for this NOP/IS scheduled to begin on February 8, 2024, and will conclude on March 26, 2024. Responsible and trustee public agencies and other interested or involved agencies, organizations, and private individuals will be notified of the availability of the NOP/IS. The document is also available for review online at <https://www.portoflosangeles.org/ceqa>. A copy of the document is available for public review at the Los Angeles Harbor Department, Environmental Management Division, located at 425 South Palos Verdes Street, San Pedro, CA 90731. Please send your request to [ceqacomment@portla.org](mailto:ceqacomment@portla.org) or call (310) 732-3615 to schedule an appointment to pick up a copy.

During the 45-day public scoping period, the public has an opportunity to provide written comments on the information contained within this NOP/IS. Comments on the NOP/IS should be submitted in writing prior to the end of the 45-day public review period and must be postmarked by March 26<sup>th</sup>, 2024.

Please submit written comments to:

Director of Environmental Management  
City of Los Angeles Harbor Department  
425 S. Palos Verdes Street  
San Pedro, California 90731

Written comments may also be sent via email to [ceqacomment@portla.org](mailto:ceqacomment@portla.org). Comments sent via email should include the project title, "Port of Los Angeles and Port of Long Beach Goods Movement Workforce Training Facility," in the subject line. For additional information, please contact Nicole Enciso at (310) 732-3615 or [ceqacomment@portla.org](mailto:ceqacomment@portla.org).

A public scoping meeting for the Proposed Project will be held on February 22<sup>nd</sup>, 2024 via Zoom. Information can be found at <https://www.portoflosangeles.org/ceqa>.

## 1.2 DOCUMENT FORMAT

This NOP/IS contains the following five sections:

- **Section 1.0. Project Overview and Background.** This section provides an overview of the Proposed Project and the CEQA environmental documentation process.
- **Section 2.0. Project Description.** This section provides a detailed description of the Proposed Project's objectives and components.
- **Section 3.0. Project Permits and Approvals.** This section lists approvals and permits that could be required for the Proposed Project.
- **Section 4.0. Initial Study Checklist.** This section presents the CEQA checklist for all issue areas and mandatory findings of significance.
- **Section 5.0. Environmental Analysis.** This section presents the environmental analysis for each issue area identified on the environmental checklist. If the Proposed Project does not have the potential to significantly affect a given issue area, the relevant section provides a brief discussion of the reasons why no or less-than-significant impacts are expected. If the Proposed Project could have a potentially significant impact on a resource, the issue area discussion provides a description of potential impacts, and the issue area will be evaluated further in the EIR.
- **Section 6.0. Preparers and Contributors.** This section lists professional staff involved in the preparation of the NOP/IS.
- **Section 7.0. References.** This section provides a list of reference materials used during preparation of the NOP/IS.

The environmental analysis included in Section 5.0, Environmental Analysis, is consistent with the CEQA IS format presented in Section 4.0, Initial Study Checklist. Impacts are separated into the following categories:

- **Potentially Significant Impact.** This category is only applicable if substantial evidence indicates that an effect may be significant, and no feasible mitigation measures can be identified to reduce impacts to a less-than-significant level. Issues considered potentially significant will be further analyzed in the EIR.
- **Less-than-Significant Impact With Mitigation Incorporated.** This category applies where the incorporation of mitigation measures would reduce an effect from a “Potentially Significant Impact” to a “Less-than-Significant Impact.” The lead agency must describe the mitigation measure(s) and briefly explain how they would reduce the effect to a less-than-significant level (mitigation measures from earlier analyses may be cross -referenced). Given that this is an IS, potentially significant impacts that require mitigation will be carried forward to the EIR for further analysis.
- **Less-than-Significant Impact.** This category is identified when the Proposed Project would result in impacts below the threshold of significance, and no mitigation measures are required. Issues considered less than significant are discussed in this IS and will not be carried forward to the EIR.
- **No Impact.** This category applies when the Proposed Project would not create an impact in the specific environmental issue area. “No Impact” answers do not require a detailed explanation if they are adequately supported by the information sources cited by the lead agency that show that the impact does not apply to the specific project (e.g., the project falls outside of a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors and general standards (e.g., the Proposed Project would not expose sensitive receptors to pollutants based on a project-specific screening analysis). Issues considered to have no impact are discussed in this IS and will not be carried forward to the EIR.

## **2.0 PROJECT DESCRIPTION**

### **2.1 PROJECT OVERVIEW**

This Initial Study (IS) Checklist has been prepared to evaluate the reasonably foreseeable and potential impacts associated with the construction and operation of a facility to train the workforce at the Ports of Los Angeles and Long Beach. The Proposed Project site is comprised of approximately 30 acres and is located at 1400 East Anchorage Road in the northern portion of the Port of Los Angeles (POLA) west of State Route (SR)-47 and North Henry Ford Avenue, and east of Shore Road, in the community of Wilmington within the City of Los Angeles, California.

The Proposed Project's construction would include the following activities: site preparation such as grading, compacting, and paving as well as construction of buildings, utilities, a substation, and accessory structures to support workforce training activities.

The Proposed Project's operations at the training facility would include providing skilled training programs that would replicate goods movement environments such as the use and operation of ship-to-shore (STS) cranes, transtainers, top handlers, side picks, forklifts and heavy lifts, while providing a safe training environment for workers. While the details are still forthcoming, a facility operator would operate the Proposed Project as a workforce training facility to educate the current and future workforce on maritime and goods movement industries that serve the San Pedro Bay Port Complex (Port of Los Angeles and Port of Long Beach, collectively). This would be the first training facility in the United States dedicated to the goods movement sector, including training for longshore, trucking, and warehouse occupations. The Los Angeles Harbor Department (LAHD) would enter into a long-term entitlement at the Proposed Project site with a training facility operator to be identified in the future. For the analysis in the Initial Study Checklist, the Proposed Project is assumed to be in operation for 30 years.

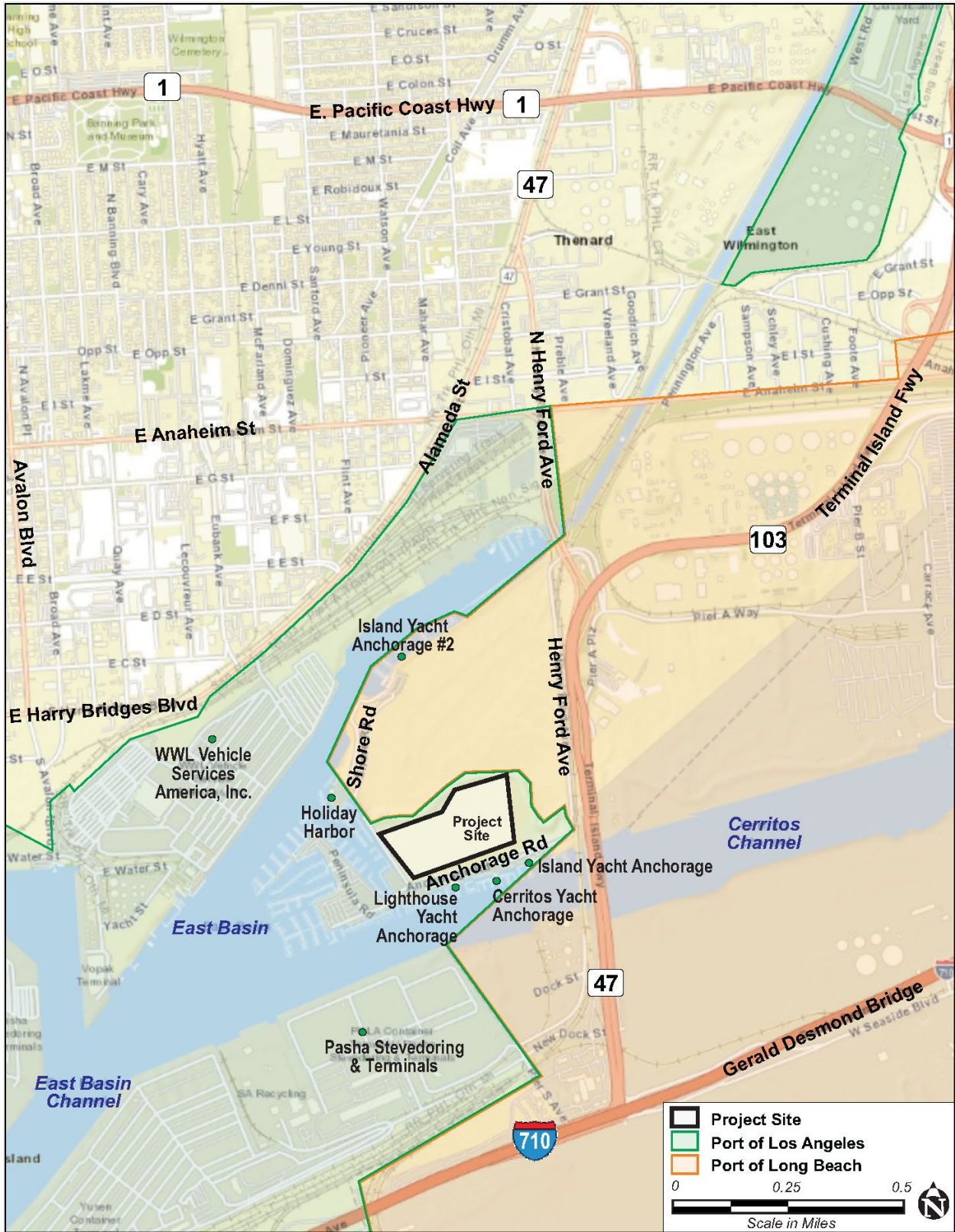
This section discusses the location, background, objectives, and description of the Proposed Project.

#### **2.1.1 Project Location**

##### Regional Setting

The Proposed Project site is located in the northern portion of the Port, approximately 20 miles south of downtown Los Angeles (Figure 2-1). The Port encompasses approximately 7,500 acres, including 3,300 acres of water and 43 miles of waterfront. The Port has approximately 270 commercial berths and 27 terminals, including leased facilities to handle containers, automobiles, dry bulk, breakbulk and liquid bulk products, and cruise ships, as well as extensive transportation infrastructure for intermodal cargo movement by truck and rail.

Figure 2-1. Project Location



The Port accommodates passenger cruise and ferry terminals, includes boat repair yards, and provides slips for 3,800 recreational vessels, 78 commercial fishing boats, 35 miscellaneous types of small-service craft, and 15 charter vessels for sport fishing and harbor cruises. The Port also accommodates water-dependent recreational, visitor-serving, community, and educational facilities, such as a public beach, the Cabrillo Beach Youth Waterfront Sports Center, Cabrillo Marine Aquarium, Los Angeles Maritime Museum, 22<sup>nd</sup> Street Park, and the Wilmington Waterfront Park.

LAHD, a proprietary department of the City of Los Angeles (City), is charged with the operation, maintenance, and management of the Port in accordance with the City Charter. As landlord, LAHD leases properties to more than 300 tenants, including private terminal, tug, marine cargo, and cruise industry operators. LAHD administers the Port under the California Tidelands Trust Act of 1911, as amended, California Public Resources Code Section 6306 – Granted Public Trust Lands. The City Charter requires LAHD to manage and operate the Port to promote and accommodate maritime commerce, navigation and fishery.

The Proposed Project site is within Planning Area 2 of the Port, which consists of a variety of uses ranging from Containers, breakbulk, liquid and dry bulk and maritime support to recreational boating and open space, as designated by the Port Master Plan (LAHD, 2018). Recreational uses such as marinas are located nearby to the north, south, and west of the Proposed Project site (Figure 2-1). Nearby marinas include Island Yacht Anchorage (1500 Anchorage Road, #205d), Cerritos Yacht Anchorage (1400 Anchorage Road), Lighthouse Yacht Marina (Berth 205-B, 1300 Anchorage Road), Holiday Harbor (701 Shore Road), and Island Yacht Anchorage #2 (700 Shore Road). WWL Vehicle Services, Americas, Inc. is located at Berths 195-200A, approximately 0.26 mile northwest of the Proposed Project site across East Basin. Pasha Stevedoring & Terminals, LP (breakbulk) is located at Berths 206-209, approximately 0.16 mile southwest of the Proposed Project site across the Cerritos Channel (LAHD, 2023d). Property owned by the Port of Long Beach is located adjacent to the north and east.

### Project Setting

The Proposed Project site is located at 1400 East Anchorage Road, Wilmington, CA 90744, northeast of the intersection of Shore Road and Anchorage Road within the City of Los Angeles, California. The site is bounded by Shore Road to the west, Anchorage Road to the south, a wetland to the northwest, and asphalt roads adjacent to partially undeveloped land to the north and east owned by the Port of Long Beach. The partially undeveloped land to the north and east appears to be in oil production as was apparent from several oil derricks, above-ground pipelines, and other infrastructure that were observed during a site visit in July 2022. Recreational uses such as boat marinas are located to the north, south, and west of the Proposed Project site, and automobile shipping and breakbulk cargo uses are located across the East Basin and Cerritos Channel (Figure 2-1).

Shore Road would provide the primary point of ingress and egress during construction and operations; a secondary egress on Anchorage Road would provide emergency access to comply with the City of Los Angeles Fire Department requirements. Regional access to the Proposed Project site is provided by SR-47 to the east, with local access provided by North Henry Ford Avenue to the east, Anchorage Road to the south, and Shore Road to the west (Figure 2-1).

### Land Use and Zoning

The Proposed Project site is within an area covered by the Port Master Plan (PMP) (LAHD, 2018). The PMP establishes policies and guidelines to direct future development of the Port. The original plan became effective in April 1980, after it was approved by the Board of Harbor Commissioners and certified by the California Coastal Commission (CCC). The PMP was comprehensively updated in 2014 and certified by the CCC. The PMP was amended once more in 2018 and certified by the CCC.

The PMP includes five planning areas. The Proposed Project site falls into Planning Area 2, West Basin/Wilmington (LAHD, 2018). The Proposed Project would replace a potential redevelopment project for passive open space mentioned for the site in the PMP. PMP Section 5.4.4 states that the Proposed Project site was planned for development as passive open space with native habitats, wetlands, turf, hardscapes, and numerous trails. Planning Area 2 encompasses the West Basin and Wilmington areas and includes Berths 96-204. The West Basin consists of container terminals, while the remaining Wilmington areas consist of a variety of uses ranging from breakbulk at Berths 176-181, liquid bulk at Berths 148-150, and liquid and dry bulk uses on Mormon Island, to recreational boating and open space along Anchorage Road. The Wilmington Waterfront land uses provide public access to the waterfront at Berths 183-186.

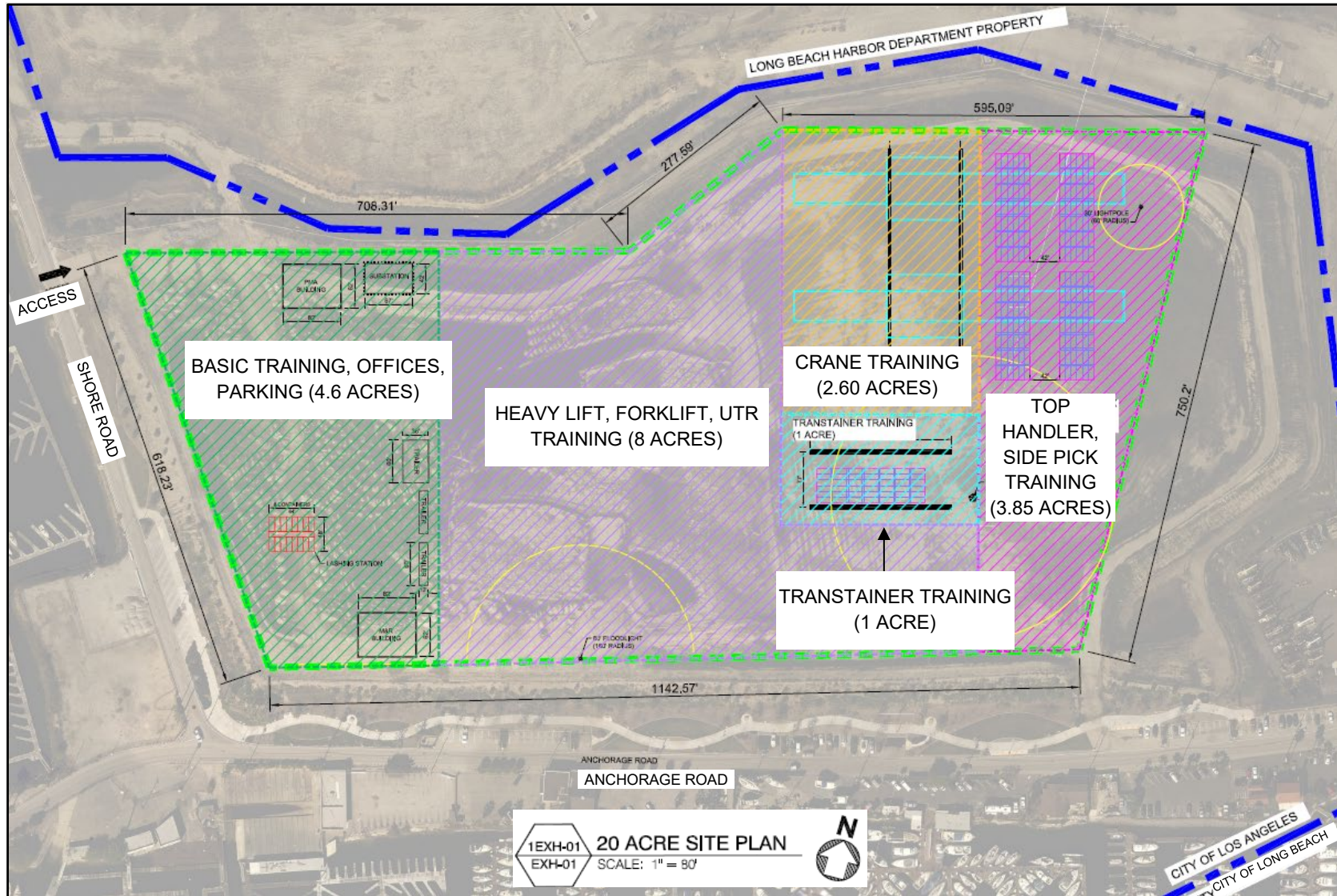
The Proposed Project site is on Assessor's Parcel Number (APN) 7440011908, which is designated as Open Space in the PMP (LAHD, 2018). The Proposed Project would require a PMP Amendment to update the designated land use for the site.

The Proposed Project site is zoned as qualified-light industrial ([Q]M2-1) and Heavy Industrial (M3) under the City of Los Angeles Zoning Ordinance (City of Los Angeles, 2023).

#### **2.1.2 Proposed Site Plan**

As discussed further in Section 2.1.3, Existing Site Conditions, the Proposed Project site is currently undeveloped and unoccupied, and contains dredged material consisting of soils of unknown origin that have been stored by the Port (Ninyo & Moore, 2022). The Proposed Project site is comprised of approximately 30 acres of land, of which 20 acres would be paved and developed under the Proposed Project. See Figure 2-2 for the proposed site plan. The final geometry of the site would be dependent on refinement of the final Project design.

Figure 2-2. Proposed Site Plan



Source: LAHD, 2023d

Note: This proposed site plan is subject to refinement as the Proposed Project design is further developed.

### **2.1.3 Existing Site Conditions**

The Proposed Project site varies in elevation but is relatively flat with inclines in the southeast, eastern, and northeastern corners and central-western portion. Earthen berms are located to the south and west generally along the boundaries of the Proposed Project site. An alkali pond and several seasonal freshwater pools are present on the Proposed Project site. The Proposed Project site also contains soil stockpiles, debris, and dredge and fill material deposited at the site from past Port projects (Ninyo & Moore, 2022).

The Proposed Project site is currently unoccupied and was used as a dump site for excess soil for the past decade (Earth Mechanics, Inc., 2022). A site walk conducted by Ninyo & Moore on July 6, 2022 noted numerous stockpiles of various materials (various soil types, dredged materials, concrete slabs, asphalt, gravel, cobbles, boulders, etc.) at the north-central, northwest, and southwest portions of the site. Remnant debris such as piping, used tires, ceramic tiles, and a large roll-off waste bin were observed on the western half of the property, and a 55-gallon steel drum with unknown contents was also observed in the eastern portion of the property (Ninyo & Moore, 2022). Based on the soil stockpile characterization sampling conducted by Ninyo & Moore in May 2023, stockpiled soil contains concentrations of contaminants exceeding regulatory screening levels. Stockpiled soils would be characterized as both non-hazardous and non-Resource Conservation and Recovery Act (RCRA) hazardous waste (Ninyo & Moore, 2023a).

Ninyo & Moore also prepared the Baseline Soil, Soil Vapor, and Groundwater Investigation Report for the Proposed Project. The investigation determined that total petroleum hydrocarbons (TPH) and Title 22 metals in groundwater should not pose a substantial human health risk for site occupants. The investigation also found volatile organic compound (VOC) concentrations in soil vapor samples and identified the Project site being located within a methane zone (Ninyo & Moore, 2023b).

According to the California Geologic Energy Management Division (CalGEM) Well Finder tool, no active wells are within the Proposed Project site boundary, but the site includes several inactive wells as noted by the gray circle icons in Figure 2-3 (CalGEM, 2023).

**Figure 2-3. CalGEM Well Finder Results**



Source: CalGEM, 2023.

## 2.1.4 Project Background and Objectives

### Project Background

In 2017, the California Workforce Development Board awarded the Port a High Road Training Partnership (H RTP) grant. The Port was one of the State’s first recipients and was awarded the grant to promote a partnership between the Port, the Pacific Maritime Association (PMA) and the International Longshore & Warehouse Union (ILWU) (POLA, 2023a). The partnership’s focus was to examine how to bring high road principles, such as equity, job quality, and sustainability into longshore work. The grant award and the high road partnership resulted in a mutual understanding for the need of a workforce training facility at the Port that could provide all goods movement workers with state-of-the-art training in a safe environment. In 2019, Port staff began to discuss a possible workforce training facility.

In June 2022, the California State Legislature adopted the State of California’s Fiscal Year (FY) 2022-2023 budget, which was signed into law by Governor Newsom. The adopted budget includes \$110 million for construction of the Proposed Project facility provided in the following three annual installments: \$30 million in FY 2022-2023; \$40 million in FY 2023-2024; and \$40 million in FY 2024-2025. The adopted budget allows the State of California, through the California Workforce Development Board, to provide the funding to the Port in the above schedule, with the FY 2023-2024 and FY 2024-2025 allocation subject to approval of fund amounts in the budget for those fiscal years. In January 2024, the Governor addressed a State budget shortfall by adjusting the \$40 million previously scheduled for FY 2024-2025 to \$20 million in FY 2025/2026 and \$20 million in FY 2026-2027.

Over time, staff continued to refine the site locations and possible designs of the Workforce Training Facility, and the Port of Long Beach joined in efforts to move this project forward. As the goods movement sector is closely linked across the different nodes of the supply chain, staff began to develop the Workforce Training Facility design to benefit the entire goods movement sector and therefore focus on training in occupations related to longshore work, trucking, and warehousing.

The Proposed Project would be the first workforce training facility in the United States dedicated to the goods movement sector. The goal of the Workforce Training Facility is to provide a facility for the existing and future training needs in these occupations and provide a state-of-the-art facility to train workers in this industry on zero-emission cargo handling equipment as the San Pedro Bay Port Complex seek to transition to zero-emission cargo handling equipment by 2030 and drayage trucks by 2035. The Workforce Training Facility would replicate goods movement environments by providing skilled training programs such as the use and operation of STS cranes, transtainers, top handlers, side picks, forklifts and heavy lifts, while providing a safe training environment for workers. The Proposed Project is described in detail in Section 2.3.

### Project Objectives

The primary objectives of the Proposed Project are to:

1. Prepare the existing site to support the construction and operation of a training facility devoted to educating current and future workforce on the maritime and goods movement industries serving the San Pedro Bay Port Complex.
2. Address the existing labor shortage by attracting new workers and providing opportunities for up-skilling or re-skilling to meet the needs of the cargo industry.
3. Increase cargo terminal efficiency by providing a modern workforce training facility implementing new technologies and in cooperation with local stakeholders.
4. Meet local environmental goals, including the transition to zero-emissions cargo handling equipment by 2030 and trucks by 2035, by incorporating zero- and near-zero emissions technologies and implementing new sustainability standards.
5. Develop previously vacant land on Port property in a manner that is consistent with underlying industrial zoning and adjacent industries operating within the Port of Los Angeles.

## 2.2 CEQA BASELINE

CEQA requires an EIR to include an assessment of the significance of a project's impacts in comparison to a baseline that consists of the existing physical environmental conditions at and near a project site. Baseline conditions are normally measured at the time of commencement of environmental review of a proposed project. CEQA Guidelines, Section 15125, subdivision (a), provides:

*An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.*

The CEQA baseline for the Proposed Project is the existing conditions of the unoccupied site. Currently, no operations are taking place at the Proposed Project site, and therefore, no employee trips are being generated at the site. The Proposed Project would result in a new use at the site and could cause new potential impacts such as emissions, noise, and passenger vehicle trips associated with construction (site preparation and buildout) of the facility and proposed operations at the training facility.

## 2.3 PROJECT DESCRIPTION

### 2.3.1 Construction

The construction of the Proposed Project, including best management practices, schedule, phases, workforce, and equipment, are discussed in the following sections.

#### Construction Schedule

Proposed Project construction would be completed in two phases. Phase 1 would include earthwork improvements, and Phase 2 would include construction of the training facility. Construction of the Proposed Project is anticipated to take approximately 36 months in total for both phases.

**Phase 1 (Earthwork Improvements).** Earthwork improvements would involve the following sub-phases: (1) site preparation (including removal of abandoned piping and utility work for plugged oil wells), (2) vertical wick drain construction and surcharge, and (3) grading. Construction would typically be completed on Monday through Friday during daylight hours between approximately 8:00 a.m. and 4:00 p.m. Schedule adjustments may be required depending on various factors. Work would be sequential, is expected to begin in January 2026, and would take approximately 12 months to complete Phase 1.

**Phase 2 (Construction of the Workforce Training Facility).** Construction of the training facility is anticipated to be completed over approximately 24 months. Construction would include the following phases: (1) building construction, (2) pavement construction, (3) utility improvements (including installation of a substation), (4) crane rail construction, (5) pile driving, (6) fencing, and (7) striping. The estimated timeline of construction is as follows:

- Paving: 18 days
- Utility Work: 24 months
- Building and infrastructure development: 4 months

Construction sequencing would include overlap between the subphases such that construction would take up to 24 months to complete. Construction activities during Phase 2 would be completed on Monday through Friday during daylight hours between 8:00 a.m. and 4:00 p.m.

More details on the construction activities during each phase are provided in the following sections.

#### Phase 1: Earthwork Improvements

During this phase, LAHD would prepare the site prior to construction and operation of the proposed Workforce Training Facility. The site would be backfilled, compacted, and graded to provide a level site in preparation of Phase 2 (construction of the Workforce Training Facility). The Proposed Project site would be graded to direct surface runoff towards the proposed storm drain system. LAHD would first remove existing debris from the site, which would include concrete slabs, asphalt, gravel, cobbles, boulders, piping, used tires, and ceramic tiles. LAHD would remove all debris and backfill deficient areas with approximately 32,000 cubic yards (CY) of imported fill. Existing soil that is able to be retained on site would be strengthened by using a combination of surcharge and vertical wick drains to accommodate the proposed facility. Any excess soil material left over after grading would be used to construct a berm wall along the perimeter of the Proposed Project site. Existing plugged oil wells on site (Figure 2-3) would be assessed for abandonment if no responsible operator is present, in accordance with CALGEM Statutes and Regulations under California Public Resources Code (PRC) Sections 3208 and 3208.1. Dewatering of surface water and groundwater may be required to remove an existing alkali pond and several seasonal freshwater pools on the Proposed Project site. Following dewatering, wastewater would be temporarily stored on site in tanks for off-site disposal, and the areas would be backfilled.

Site infrastructure improvements would include installation of utility systems including electrical, sewer, water, storm drain, and telecommunication systems. During on-site earthwork improvement activities, the construction contractor would use a meter to obtain water from the municipal water supply for dust control. The contractor may apply for a permit to discharge wastewater directly into the nearest sewer, or wastewater may be temporarily stored on site for off-site disposal.

Hazardous or non-hazardous construction-generated waste, including existing soil stockpiles, would be hauled and disposed of at a licensed landfill permitted to accept the waste.

## Phase 2: Construction of the Workforce Training Facility

Once the site has been prepared, LAHD would develop backland; construct a crane girder, lashing and electric equipment charging stations, and buildings; and install perimeter fencing, a crane, lighting, and other underground utilities. On the approximately 30-acre site, approximately 20 acres would be paved in preparation for construction of a parking lot, office buildings, trailers, and equipment training areas. Surface runoff from paved surfaces would be directed to the proposed storm drain system through the site grading completed under Phase 1 (Earthwork Improvements). Of the approximately 20 acres to be paved, approximately 4.6 acres of the western end of the Proposed Project site would likely be occupied by the approximately 20,000-square foot (SF) PMA office building, an approximately 300-space parking lot, an approximately 3,000-SF substation, three trailers totaling approximately 5,000 SF, an approximately 5,000-SF mechanic and repair building (M&R) to support both workforce training and on-site repairs for training equipment, and an approximately 3,000-SF lashing station (LAHD, 2023e). As discussed in Section 2.1.2, the final geometry of the site may vary depending on refinement of the final Project design. A proposed site plan is provided as Figure 2-2 in Section 2.1.2, but is subject to refinement as the Proposed Project design is further developed.

The Proposed Project site would include several outdoor training areas. Approximately 8 acres of the Proposed Project site would be developed for heavy lift, forklift, and utility tractor rig (UTR) training operations. Approximately 2.6 acres would be developed for crane training; approximately 1 acre would be developed for transtainer training; and approximately 3.85 acres would be developed for top handler and side pick training. Moveable K-rail fencing would be placed in the outdoor training areas.

The buildings that would be constructed would be used for indoor activities, such as crane simulators, personnel training, restrooms, break rooms, storage, strength and agility space, and conference rooms. Approximately 20,000 SF of the Proposed Project site (Figure 1) would be dedicated to PMA office space. One 100-person-capacity general safety training classroom and three 50-capacity general use classrooms would be constructed. All buildings would be Leadership in Energy and Environmental Design (LEED) certified.

The lighting for the entire Proposed Project site would include four 100-foot-high mast light poles, ten 80-foot flood lights, and twelve 30-foot light poles. Additional electrical improvements, including the installation of a new substation, at the site would include new utility services for the new office and M&R buildings, classrooms, site lighting, STS cranes, and electric vehicle and equipment charging infrastructure, including the construction of a new substation.

Heavy equipment for training operations would also be transported to the Proposed Project site for installation. The STS cranes may be transported in parts to the Proposed Project site by ship and truck and assembled on site. Smaller equipment such as the top handlers, side picks, forklifts, heavy lifts, UTRs, and payloaders may be transported by large truck.

Training equipment to be transported to the site would include the following (LAHD, 2023e):

- STS cranes
- Transtainer
- Top handlers
- Side pick
- Forklifts
- Heavy lifts
- UTRs
- Payloader
- Winch

Additional details about the training equipment to be used at the facility are described in Section 2.3.2, Operation.

#### Construction Workforce and Equipment

Up to 50 construction workers per day would be required for construction (LAHD, 2023b, 2023c).

Construction equipment for earthwork improvements under Phase 1 is anticipated to include the following (LAHD, 2023c):

- Tractor/loader/backhoes
- Scrapers
- Rollers
- Cement and mortar mixers
- Water trucks
- Rubber tired dozers
- Graders
- Paving equipment
- Excavators
- Dump trucks

Equipment to construct the training facility during Phase 2 is anticipated to include the following (LAHD, 2023c):

- Welders
- Forklifts
- Graders
- Tractor/loader/backhoes
- Cranes
- Generators
- Generator sets
- Air compressors
- Barges

#### Best Management Practices

The Proposed Project would include implementation of standard construction best management practices (BMPs) in accordance with the Proposed Project's construction Stormwater Pollution Prevention Plan (SWPPP) to comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit) (CGP) and any subsequent iterations for stormwater discharges associated with construction. Fuel would be stored on site to allow for on-site refueling of construction equipment. Industry-standard BMPs would be developed to ensure safe storage, prevent hazardous conditions, and minimize accidents. All equipment would be serviced and inspected before work. The construction contractor would prepare a Health and Safety Plan to address proper handling, storage, and disposal of hazardous materials used during construction.

Shore Road would provide the primary point of ingress and egress during construction (Figure 2-1). Construction traffic control would follow LAHD's On-Site Traffic Control requirements, which include providing temporary traffic controls such as flag persons, signs, and barricades necessary to control traffic during construction in conformance with the California Manual of Uniform Traffic Control Devices. Construction activities that affect traffic flow on the arterial system would be scheduled to off-peak hours to the extent practicable (POLA, 2023b). The construction contractor would be required to regulate speed on the Proposed Project site and laydown areas to minimize generating dust.

### **2.3.2 Operation**

Operations at the Proposed Project site would consist of various types of training that would take place on a daily basis ranging from classroom training to hands-on equipment training. Proposed buildings and facilities to support training operations are described in Section 2.3.1, Construction (see "Phase 2: Construction of the Workforce Training Facility"). Shore Road would provide the primary point of ingress and egress during operation; a secondary egress on Anchorage Road would provide emergency access to comply with the City of Los Angeles Fire Department requirements. Regional access to the Proposed Project site is provided by SR-47 to the east, with local access provided by North Henry Ford Avenue to the east, Anchorage Road to the south, and Shore Road to the west (Figure 2-1). A proposed site plan is provided as Figure 2-2 in Section 2.1.2, which is subject to refinement as the Proposed Project design is further developed.

The facility operator would operate the Proposed Project site for 30 years, commencing in approximately 2029. Up to 150 full-time and part-time employees would work at the site in one shift during operations; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b, 2023c). The site would be open for operations on Monday through Friday between 7:00 a.m. and 5:00 p.m. regularly with night shift training, when necessary, occurring between 6:00 p.m. and 3:00 a.m.

Workers would be trained on the use of the following equipment (see Table 2-1):

- Two STS cranes
- One transtainer
- Four top handlers
- One side pick
- Four heavy lifts
- Six forklifts
- 14 UTRs
- Payloader
- Winch

Workers would also be trained on lashing and signaling procedures and maintenance and repair work. Training for longshore skills is part of an onboarding process administered by the PMA for entry level longshore workers. Longshore training would also include specific skills training for incumbent workers. Training for occupations in trucking and warehousing would involve coordination with academic institutions, employers, and union partners that would require space for the training on an as-needed basis. In addition to specific training programs across the various occupations mentioned, the Workforce Training Facility would focus on providing training opportunities on operation and maintenance of new zero emission cargo handling equipment such as battery electric and hydrogen fuel cell technology.

Maintenance of the Proposed Project would include mechanical maintenance and as-needed repairs of skill training equipment that would require coverage under the Stormwater Industrial General Permit (IGP) and proposed Commercial, Industrial, and Institutional (CII) Permit. Third-party vendors would provide daily cleaning services and as-needed HVAC servicing. Additional as-needed building repairs would be conducted sporadically by third-party vendors or contractors.

Table 2-1 provides photos and brief descriptions of the equipment to be used during training operations.

**Table 2-1. Anticipated Training Equipment**



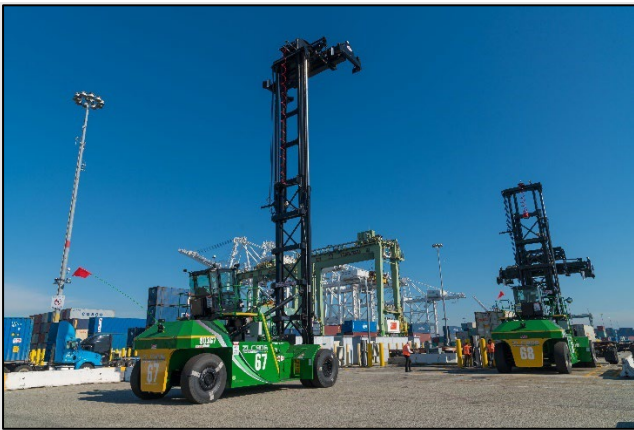
**Ship-to-Shore (STS) Crane.** A large dockside gantry crane used at container terminals to load and unload containers from cargo ships. A landside STS crane would be used at the Workforce Training Facility to simulate typical STS crane operations, without cargo ships at the site.



**Transtainer.** A large gantry crane consisting of parallel frame bars with crossbars that hold the crane mechanism over the container stacks. Used to load, unload, or stack containers.



**Utility Tractor Rig (UTR).** Semi-tractor used to move trailers within a cargo yard, warehouse facility, or intermodal facility.



**Top Handler.** A cargo container handler with an overhead boom used to lift containers up to 100,000 pounds.



**Side Pick.** A flexible front or side loader that can reach up to multiple stacks of containers.



**Forklift and Heavy Lift.** Used for the loading and unloading of goods over short distances.



**Payloader.** Machinery used to load and carry materials or large objects across a job site or to place loads into other vehicles or areas.



**Winch.** A device that holds a line or cable to keep a vessel tightly secured while docked.

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Source: Crowley, Michael, 2021; Eusebio, Dustin, 2022; Flexport, 2023; Liebherr, 2023; Nautic Expo, 2023; Paceco Corp., 2021; World Ports Sustainability Program, 2023.

### **3.0 PROJECT PERMITS AND APPROVALS**

Under CEQA, the lead agency is the public agency with primary responsibility over approval of a proposed project. Pursuant to the CEQA Guidelines (14 California Code of Regulations [CCR] 15367), the CEQA lead agency for the Proposed Project is LAHD.

The approvals or permits that could be required for the Proposed Project include, but would not be limited to, the following actions by the identified agencies:

- South Coast Air Quality Management District (equipment permits)
- Los Angeles County Regional Water Quality Control Board Storm Water Permits (Construction General Permit; Industrial General Permit; Commercial, Industrial & Institutional Permit, as applicable)
- City of Los Angeles Sanitation District Wastewater Permit
- City of Los Angeles Department of Building and Safety Permit
- City of Los Angeles Fire Department
- LAHD Entitlement, Port Master Plan Amendment, and Coastal Development Permit
- Port of Long Beach
- California Coastal Commission Port Master Plan Amendment (with concurrence by the California Coastal Commission)

## 4.0 INITIAL STUDY CHECKLIST

1	<b>Project Title:</b>	Port of Los Angeles and Port of Long Beach Goods Movement Workforce Training Facility
2	<b>Lead Agency Name and Address:</b>	Los Angeles Harbor Department (LAHD) Environmental Management Division 425 South Palos Verdes Street San Pedro, California 90731
3	<b>Contact Person and Phone Number:</b>	Nicole Enciso (310) 732-3615
4	<b>Project Location:</b>	1400 East Anchorage Road San Pedro Port of Los Angeles
5	<b>Project Sponsor's Name and Address:</b>	Los Angeles Harbor Department (LAHD) 425 South Palos Verdes Street San Pedro, California 90731
6	<b>Port Master Plan Designation:</b>	Planning Area 2, West Basin/Wilmington – Open Space
7	<b>Zoning:</b>	Qualified Light Industrial ([Q] M2-1), Heavy Industrial (M3)
8	<b>Description of Project:</b>	<p>The Proposed Project's construction would include site preparation such as grading, compacting, and paving as well as the construction of buildings, utilities, and accessory structures to support workforce training activities.</p> <p>The Proposed Project's operations would include providing skilled training programs that would replicate goods movement environments such as the use and operation of ship-to-shore cranes, transtainers, top handlers, side picks, forklifts, and heavy lifts, while providing a safe training environment for workers. The Pacific Maritime Association and International Longshore and Warehouse Union would participate in the Proposed Project as a workforce training facility to educate the current and future workforce on maritime and goods movement industries that serve the San Pedro Bay Port Complex (Port of Los Angeles and Port of Long Beach, collectively). LAHD would enter into a long-term entitlement at the Proposed Project site with a training facility operator to be identified in the future.</p>
9	<b>Surrounding Land Uses/Setting:</b>	The Proposed Project site is surrounded by a variety of uses ranging from liquid and dry bulk to recreational boating and open space. Nearby marinas include Island Yacht Anchorage, Cerritos Yacht Anchorage, Lighthouse

		Yacht Marina, Holiday Harbor, and Island Yacht Anchorage #2. WWL Vehicle Services, Americas, Inc. and Pasha Stevedoring & Terminals, LP are located approximately 0.26 mile northwest and 0.16 mile southwest of the Proposed Project site, respectively. Property owned by the Port of Long Beach is located adjacent to the north and east.
10	<b>Other Public Agencies Whose Approval Is Required:</b>	<ul style="list-style-type: none"> <li>▪ South Coast Air Quality Management District</li> <li>▪ Los Angeles County Regional Water Quality Control Board</li> <li>▪ City of Los Angeles Sanitation District</li> <li>▪ City of Los Angeles Department of Building and Safety</li> <li>▪ City of Los Angeles Fire Department</li> <li>▪ City of Los Angeles Harbor Department</li> <li>▪ Port of Long Beach</li> <li>▪ California Coastal Commission Port Master Plan Amendment (with concurrence by the California Coastal Commission)</li> </ul>
11	<b>Have California Native American Tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21808.3.1?</b>	No (refer to Section 5.18, Tribal Cultural Resources)

#### 4.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project (i.e., the Proposed Project would involve at least one impact that is a “Potentially Significant Impact”), as indicated by the checklist on the following pages.

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources       | <input type="checkbox"/> Energy  |
| <input type="checkbox"/> Geology and Soils               | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality     | <input checked="" type="checkbox"/> Land Use Planning        | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                | <input type="checkbox"/> Population and Housing              | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                      | <input checked="" type="checkbox"/> Transportation           | <input type="checkbox"/> Tribal Cultural Resources                     |
| <input type="checkbox"/> Utilities and Service Systems   | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

## 4.2 DETERMINATION

On the basis of this initial evaluation:

I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the Proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.



Signature

Lisa Wunder, Acting Director  
Environmental Management Division  
City of Los Angeles Harbor Department

02/01/2024

Date

### 4.3 ENVIRONMENTAL CHECKLIST

#### Evaluation of Environmental Impacts:

1. A brief explanation is required for all answers except “no impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “no impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “no impact” answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially significant impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “potentially significant impact” entries when the determination is made, an EIR is required.
4. “Negative declaration: less than significant with mitigation incorporated” applies when the incorporation of mitigation measures has reduced an effect from a “potentially significant impact” to a “less-than-significant impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less -than -significant level.
5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063[c][3][D]). In this case, a brief discussion should identify the following:
  - (a) Earlier analysis used. Identify and state where earlier analyses are available for review.
  - (b) Impacts adequately addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - (c) Mitigation measures. For effects that are “less than significant with mitigation incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site -specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting information sources. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - (a) the significance criteria or threshold, if any, used to evaluate each question, and
  - (b) the mitigation measure identified, if any, to reduce the impact to a less-than-significant level.
10. The evaluations with this IS assume compliance with all applicable federal, state, and local laws, regulations, rules, and codes. In addition, the evaluation assumes that all conditions in applicable agency permits are complied with, including but not limited to local permits, air quality district permits, water quality permits and certifications, United States (U.S.) Army Corps of Engineers permits, and other agency permits, as applicable.

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>1. AESTHETICS.</b> Except as provided in Public Resources Code Section 21099, <b>would the project:</b>				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>2. AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. <b>Would the project:</b>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland-zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>3. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. <b>Would the project:</b>				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>4. BIOLOGICAL RESOURCES.</b> <b>Would the project:</b>				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the city or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>5. CULTURAL RESOURCES. Would the project:</b>				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>6. ENERGY. Would the project:</b>				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>7. GEOLOGY AND SOILS. Would the project:</b>				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
c. Be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>8. GREENHOUSE GAS EMISSIONS. Would the project:</b>				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>10. HYDROLOGY AND WATER QUALITY. Would the project:</b>				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>11. LAND USE PLANNING. Would the project:</b>				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>12. MINERAL RESOURCES. Would the project:</b>				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>13. NOISE. Would the project result in:</b>				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>14. POPULATION AND HOUSING. Would the project:</b>				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>15. PUBLIC SERVICES.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>16. RECREATION</b>				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>17. TRANSPORTATION. Would the project:</b>				
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>18. TRIBAL CULTURAL RESOURCES</b>				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>19. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
<b>20. WILDFIRE.</b> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, <b>would the project:</b>				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>21. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 5.0 ENVIRONMENTAL ANALYSIS

### 5.1 AESTHETICS

#### Discussion:

a. **Would the project have a substantial adverse effect on a scenic vista?**

**Less-than-Significant Impact.** The Conservation Element of the City of Los Angeles General Plan defines a scenic vista as a panoramic public view with access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic features (City of Los Angeles, 2001). No sensitive public viewpoints or scenic vistas are in the immediate Project vicinity; however, panoramic views of the Port and Pacific Ocean are available from distant public vantages. The site provides distant views of industrial and cargo activities at nearby terminals.

The Proposed Project's construction would include backfilling, grading, compacting, and installation of equipment and buildings, followed by operation of the Workforce Training Facility. Overall, the Proposed Project would blend in with the existing industrial visual character of the Port, as the areas surrounding the Proposed Project site are highly developed and include recreational, automobile shipping, and breakbulk cargo uses. The Proposed Project site is currently unoccupied, and the Proposed Project would include new buildings and training equipment, including large equipment such as STS cranes and transtainers (Table 2-1). Although the Proposed Project site is currently minimally developed, it has signs of previous disturbance such as abandoned utilities, soil and debris stockpiles, and other remnant abandoned refuse. Views of the site from adjacent public roads (Anchorage Road and Shore Road) are primarily obscured by the existing earthen berms and trees along the southern and western borders of the site. Furthermore, large equipment training operations would likely take place in the northeastern/central eastern portions of the Proposed Project site that would be at distances far enough to be minimally visible from nearby public vantage points (Figure 2-2).

While construction and operation of the Proposed Project would change the visual characteristics of the site, the Proposed Project would not have any substantial adverse effects on a scenic vista. The Proposed Project would not substantially affect overall views within the area, as the site is already disturbed and located on an elevated portion of land surrounded by earthen berms that block views of the site from public vantage points. The Proposed Project would be consistent with views that currently exist within the Port and would not degrade or block public views of any scenic vistas. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- b. **Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?**

**No Impact.** The Proposed Project site is not visible from an eligible or designated State scenic highway. The nearest designated State scenic highway is located approximately 25 miles northwest of the Proposed Project site (State Route [SR]-91 post miles 9.2-13.4). The nearest eligible State scenic highway (State Highway 1 from SR-19 near Long Beach to Interstate [I]-5 south of San Juan Capistrano) is approximately 6 miles northeast of the Proposed Project site (Caltrans, 2018). In addition to California Department of Transportation (Caltrans)-designated State scenic highways, the City of Los Angeles has city-designated scenic highways, but the Proposed Project site is not visible from any of these highways (City of Los Angeles, 2016). No scenic resources, including but not limited to trees, rock outcroppings, or historic buildings, within a State scenic highway could be substantially damaged by the Proposed Project. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- c. **Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**Less-than-Significant Impact.** The Proposed Project site is located in an urbanized area and would not conflict with any applicable zoning and land use regulations governing scenic quality. Although the Proposed Project would include the construction of new buildings and installation of training equipment, including STS cranes and transtainers, the Proposed Project site is currently zoned qualified-light industrial ([Q]M2-1) and Heavy Industrial (M3), and the Proposed Project would not require any changes to the existing zoning (City of Los Angeles, 2023). In addition, the Proposed Project site has been disturbed by previous construction activities and stockpiling. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- d. **Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

**Less-than-Significant Impact.** The Proposed Project site is currently unoccupied and does not contain lighting. As described in the Section 2.3, Project Description, four 100-foot-high mast light poles, ten 80-foot-high flood lights, and twelve 30-foot-high light poles would be installed where needed throughout the Proposed Project site. The nighttime lighting environment in the Proposed Project vicinity consists mainly of ambient light produced from street lighting adjacent to the Proposed Project site, marinas, parking lots, and other facility lighting at the Port. The primary source of nighttime illumination at the Port is the extensive system of down lights and flood lights attached to the tops of tall light poles throughout the terminals. Bright, high-intensity boom lights are attached on top of shipping cranes along the edge of terminals and channels along the harbor.

The Proposed Project would not introduce any high-intensity boom lights during construction or operation. While the Proposed Project would install new lighting structures along the perimeter of the site, which would include high mast light poles that would be used during night shift training between 6:00 p.m. and 3:00 a.m., the design would follow backlight, up-light, and glare (collectively referred to as “BUG”) requirements contained in building code requirements. Lighting would be directed toward the Proposed Project site rather than toward the water or liveaboard tenants, which may potentially be on boats at the marinas to the north, south, and west of the Proposed Project site. The Proposed Project would not produce substantial light or glare which would affect day or nighttime views of the area. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

## 5.2 AGRICULTURE AND FORESTRY RESOURCES

### Discussion:

- a. **Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

**No Impact.** The California Department of Conservation’s (DOC) Farmland Mapping and Monitoring Program identifies the Proposed Project site as Other Land, which is defined as land not included in any other mapping category or vacant and nonagricultural land surrounded by urban development and greater than 40 acres (DOC, 2022). The Proposed Project site is located within an industrial area and does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance that would be converted to accommodate the Proposed Project. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- b. **Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** The Williamson Act aims to preserve agricultural and open space lands by restricting use to farming and ranching uses through a contract between local governments and private landowners (DOC, 2023b). The Proposed Project site is zoned qualified-light industrial ([Q]M2-1) and Heavy Industrial (M3) under the City of Los Angeles Zoning Ordinance, and no agricultural zoning designations or agricultural uses are within the Proposed Project limits or adjacent areas (City of Los Angeles, 202). No agricultural or open space land with Williamson Act contracts is located within the Proposed Project site. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- c. **Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

**No Impact.** As discussed in Section 5.2(b) above, the Proposed Project site is zoned for qualified-light industrial uses ([Q]M2-1) and Heavy Industrial (M3) under the City of Los Angeles Zoning Ordinance, and no forest land is within or near the Proposed Project site (City of Los Angeles, 2023). The Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- d. **Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** The Proposed Project site is located in the northern portion of the Port, which does not include forest land. The Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- e. **Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

**No Impact.** As discussed in Sections 4.2(a) through (d) above, no Farmland or forest land are within the Proposed Project site or the surrounding area. The Proposed Project site is located in a highly urbanized and industrial area. The Proposed Project would not involve changes in the existing environment that could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

### 5.3 AIR QUALITY

#### Discussion:

- a. **Would the project conflict with or obstruct implementation of the applicable air quality plan?**

**Potentially Significant Impact.** The Proposed Project would result in increased emissions of criteria air pollutants associated with site preparation, building construction, and training operations, which would include employee and trainee vehicle trips. Project construction activities are estimated to take approximately 36 months for both phases. Emissions from operations would last over the duration of the entitlement term (30 years).

Additional analysis is required to determine whether the Proposed Project would conflict with applicable air quality plans, including the Air Quality Management Plan for the South Coast Air Basin and the Clean Air Action Plan. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

**b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?**

**Potentially Significant Impact.** The South Coast Air Basin has a history of non-attainment conditions and violations of the ambient air quality standards. The Proposed Project, in conjunction with other related projects, has the potential to make a substantial contribution to significant cumulative air quality impacts. Additional analysis is required to determine whether the Proposed Project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is designated non-attainment status. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

**c. Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Potentially Significant Impact.** Sensitive receptors are members of the population that are particularly susceptible to adverse health impacts from air contaminants. The following are land uses where sensitive receptors are typically located: residences, schools, playgrounds, childcare centers, and health care facilities. No schools, playgrounds, childcare centers, or health care facilities are within or adjacent to the Proposed Project site. The nearest schools, Wilmington Park Elementary School and George De La Torre Junior Elementary School, are located approximately 1.1 miles north and northwest of the Proposed Project site, respectively. No residential zoning is located within the Port,<sup>1</sup> although liveaboard tenants may potentially be on boats at the marinas to the north, south, and west of the Proposed Project site. Sensitive receptors may also be located within nearby residential communities to the north and northwest of the Proposed Project site.

Construction activities may expose sensitive receptors to air pollution in the form of combustion exhaust and fugitive dust. Operational activities, including the workforce training operations, may also expose sensitive receptors to increased levels of criteria air pollutants. According to the Baseline Soil, Soil Vapor, and Groundwater Investigation Report prepared by Ninyo & Moore on behalf of LAHD, VOCs are present in soil vapor, and the Proposed Project site is within a methane zone per the City of Los Angeles Municipal Code. Occupants inside the proposed buildings may be exposed to VOC concentrations and methane (Ninyo & Moore, 2023b).

<sup>1</sup> Residential housing is not a permitted use at the Port of Los Angeles under the state's Tidelands grants.

Additional analysis is required to determine whether the Proposed Project would expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- d. **Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Potentially Significant Impact.** Construction of the Proposed Project may cause odors from the use of diesel-powered heavy equipment and fueling activities. Odors from operation of the Proposed Project would be from vehicle and equipment operation by employees and trainees and may affect nearby receptors such as liveaboard tenants and recreational visitors at the adjacent marinas. Additional analysis is required to determine whether the Proposed Project would result in emissions such as odors that may adversely affect a substantial number of people. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

#### 5.4 BIOLOGICAL RESOURCES

##### Discussion:

- a. **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

**Potentially Significant Impact.** The Proposed Project site is vacant land that has been disturbed by previous construction activities and stockpiling. Over time, the site has developed conditions that support a mosaic of native and non-native species with several wildlife habitats including an alkali pond, seasonal freshwater pools, saltbush shrublands, and fields of herbaceous species. Several special-status species were observed on the Proposed Project site. During site visits conducted on April 10 and May 22, 2023, biologists with Aspen Environmental Group (Aspen) observed numerous native and non-native species of plants. Of these, three special-status species were observed including southern tarplant (*Centromadia parryi ssp. Australis*), estuary seablite (*Suaeda esteroa*), and woolly seablite (*Suaeda taxifolia*). Aspen biologists also observed numerous species of wildlife on the Proposed Project site, including two special-status species, the Belding's savannah sparrow (*Passerculus sandwichensis beldingi*) and burrowing owl (*Athene cunicularia*). Several additional species of special-status plants and animals also have a moderate to high potential to be present within the Proposed Project site.

Additional analysis is required to determine whether the Proposed Project would have a substantial adverse effect on candidate, sensitive, or special-status species identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- b. **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the city or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

**Potentially Significant Impact.** As discussed above, the Proposed Project site has several wildlife habitat or natural communities present such as an alkali pond, seasonal freshwater pools, saltbush shrublands, and fields of herbaceous species. While none of these are riparian habitat, they may be recognized as sensitive natural communities as identified in City or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additional analysis is required to determine whether the Proposed Project would have a substantial adverse effect on sensitive natural communities. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- c. **Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**Potentially Significant Impact.** As discussed above, an alkali pond and several seasonal freshwater pools are present on the Proposed Project site. These aquatic features appear to be isolated and do not connect to traditional navigable waters, which would likely exclude these features from being federally protected wetlands, regulated by the U.S. Army Corps of Engineers (USACE). These features are likely to be regulated by the Los Angeles Regional Water Quality Control Board (LARWQCB) and California Department of Fish and Wildlife (CDFW) as wetlands or jurisdictional lakebeds. In addition to the ponds and pools within the Proposed Project site, a tidal wetland is present along Shore Road, less than 50 feet from the northwest corner of the Proposed Project site. These adjacent wetlands are expected to fall under the jurisdiction of the USACE, LARWQCB, and CDFW but are not expected to be directly affected by the Proposed Project. Potential indirect impacts on these adjacent wetlands could result from runoff during construction or unauthorized discharge from the Proposed Project site, or changes in site drainage that could reduce natural flows into the wetland. Best management practices (BMPs) would be implemented in accordance with SWPPP requirements related to construction to comply with the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit) (CGP) and any subsequent iterations for stormwater discharges associated with construction. In addition, the Proposed Project site would be graded to direct surface runoff from paved surfaces towards the proposed storm drain system and not into the adjacent wetlands. However, additional analysis is required to determine whether the Proposed Project would have a substantial adverse effect on protected wetlands. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- d. **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

**Potentially Significant Impact.** The Proposed Project site is a largely isolated land block of wildlife habitat surrounded by industrial and commercial development. The Proposed Project site is expected to support localized movement of some species, such as coyotes (*Canis latrans*) within the Port but is not expected to support migratory pathways or wildlife corridors. The site does provide nursery sites for many species including a den site for coyote and nest sites for many birds including mallards (*Anas platyrhynchos*) and other native species. Nesting birds are protected by the Migratory Bird Treaty Act and California Fish and Game Code.

The Proposed Project is not expected to adversely affect the movement of any native resident or migratory fish or wildlife species or adversely affect established native resident or migratory wildlife corridors. The Proposed Project does have the potential to adversely affect the use of native wildlife nursery sites on the Proposed Project site if the Proposed Project activities cause direct physical disturbance of the nursery sites or result in nuisance impacts from noise. Additional analysis is required to determine whether the Proposed Project would interfere substantially with native wildlife nursery sites. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- e. **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**No Impact.** The Proposed Project site is located in a disturbed area with a mosaic of native and non-native vegetation that continues to be frequently disturbed. This on-going disturbance regime has prevented the establishments of native trees on the Proposed Project site. A limited number of non-native ornamental trees may be removed as part of the Proposed Project, but no native trees are expected to be affected. The only biological resources protected by the City's Ordinance (Ordinance No. 177404) pertain to specific tree species including oak trees, Southern California black walnut, Western sycamore, and California Bay. All trees observed onsite are non-native, none of which are protected by the City's Ordinance. The Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, the Proposed Project would result in no impacts, and this topic will not be addressed further in the EIR.

- f. **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan?**

**No Impact.** No adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other similar plans overlap with the Proposed Project area (USFWS, 2023). The nearest conservation plan area is the Rancho Palos Verdes Natural Community

Conservation Plan area, which is located over 4 miles west of the Proposed Project area (City of Rancho Palos Verdes, 2019). The County of Los Angeles (County) has established official, designated areas, referred to as Significant Ecological Areas (SEAs), within the County that contain rare or unique biological resources. The Terminal Island (Pier 400) California least tern nesting site is the only SEA in the Port and is located roughly 4 miles southwest of the Proposed Project site. The Proposed Project would not disturb the nesting site on Pier 400 because of the distance of the Proposed Project site from the SEA. The Proposed Project would not conflict with adopted conservation plans related to biological resources. Therefore, the Proposed Project would result in no impacts, and this topic will not be addressed further in the EIR.

## 5.5 CULTURAL RESOURCES

### Discussion:

a. **Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?**

**Less-than-Significant Impact.** A review of historic aerial photographs identified that holding tanks once occupied the site from 1952 to 1993. While the Proposed Project site is currently vacant, the Proposed Project's activities have the possibility of encountering unknown buried resources during earthwork. In the unlikely event that any prehistoric artifact of historic period materials or bone, shell or nonnative stone is encountered during construction activities, work shall be immediately stopped, the area secured, and work relocated to another area until the found materials can be assessed by a qualified archaeologist. Examples of such cultural materials might include historical trash pits containing bottles and/or ceramics; structural remains or concentrations of grinding stone tools such as mortars, bowls, pestles, and manos; chipped stone tools such as projectile points or choppers; and flakes of stone not consistent with the immediate geology such as obsidian or fused shale. The contractor shall stop construction within 30 feet of the location of these finds until a qualified archaeologist can be retained to evaluate the find. If the resources are found to be significant, they shall be avoided or shall be mitigated consistent with State Historic Preservation Officer Guidelines. Adherence to existing regulatory requirements and the construction specifications for the inadvertent discovery of archaeological resources would ensure that no significant impacts on historical resources would result from the construction of the Proposed Project. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

b. **Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?**

**Potentially Significant Impact.** The Proposed Project's activities have the possibility of encountering unknown buried resources during earthwork. The standard measures discussed above would be implemented during construction of the Proposed Project.

However, additional analysis is required to determine whether the Proposed Project may result in a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

**c. Disturb any human remains, including those interred outside of dedicated cemeteries?**

**No Impact.** No known cemeteries or burials are known to occur at the Proposed Project site, and the site is underlain by a variable mix of sands, silts, and clay consistent with the estuarine deposits in the area and the hydraulic fill dredge material used to construct the nearby islands (Ninyo & Moore 2022). Neither of these deposits are considered sensitive for human remains, historically or prehistorically. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

## **5.6 ENERGY**

### **Discussion:**

**a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

**Less-than-Significant Impact.** The Proposed Project would require the consumption of energy resources in the form of non-renewable fossil fuels and electricity for site power. Construction would involve the short-term use of transportation fuels and electricity by various equipment, such as off-road equipment. Construction would take approximately 36 months. Construction would not require a substantial use of electricity as most equipment would be powered by diesel, gasoline, or propane. Operations would require electric power and transportation fuels, primarily gasoline and diesel, due to equipment and vehicles accessing the site and the operation of training equipment, such as STS cranes, transtainers, utility tractor rigs, and top handlers, over the duration of the entitlement term (30 years). Over time, and by 2030, all cargo handling equipment would transition to zero-emissions equipment (battery electric and hydrogen fuel cell).

The Los Angeles Department of Water and Power (LADWP) would provide electrical services to the Proposed Project site. LADWP has an electrical transmission capacity of about 8,019 megawatts and serves over 4 million residents and businesses in the City of Los Angeles (LADWP, 2023). LADWP participates in Statewide policies and programs that promote the use of renewable resources in the electricity supply and reduction in the carbon-intensity of transportation fuels. Implementation of the State of California's Low-Carbon Fuel Standard regulations and the State's long-term goal for carbon neutrality by 2045 or earlier require transportation fuels used in California to transition to renewable fuel sources or zero-emission technologies. The electricity supply is on a long-term trend of decarbonization as a result of California's Renewable Portfolio Standard. Over time, increasing portions of the Proposed Project's energy use would be provided from renewable supplies that would decrease the

Proposed Project's use of non-renewable fuels. The energy necessary to develop and operate the proposed facilities would be used efficiently and would represent a negligible portion of state-wide energy consumption.

Construction and operation of the Proposed Project would be consistent with existing land uses in the Port's Wilmington area and would provide workforce training services to help meet the workforce demands of the San Pedro Bay Port Complex. One of the Proposed Project's primary objectives is to meet the goal of transitioning to zero-emissions cargo handling equipment by 2030 and zero-emissions drayage trucks by 2035. Not only would operational training equipment transition to zero-emissions, but workforce training activities would support Port-wide zero-emissions equipment handling. Therefore, the Proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, nor would the Proposed Project introduce unnecessary energy consuming equipment or processes. Furthermore, the use of energy to power zero-emissions equipment and vehicles would reduce environmental impacts associated with air emissions over the long-term operation of the Proposed Project. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Less-than-Significant Impact.** The Proposed Project would include construction and operation of a workforce training facility to train local workers in Port maritime and goods movement industries, up-skill and re-skill workers, and meet local zero-emissions goals by transitioning to zero-emissions cargo handling equipment and vehicles. The Proposed Project would not conflict with adopted state or local renewable energy or energy plans. The Proposed Project would support Port-wide energy goals of zero-emissions cargo handling equipment by 2030 and zero-emissions drayage trucks by 2035. The Proposed Project would not require the removal of any existing renewable energy infrastructure, such as solar or wind-powered electric generating facilities.

The City of Los Angeles would need to issue Building and Safety Permits for new buildings and would ensure compliance with energy efficiency requirements under the California Green Building Code and Appliance Efficiency Regulations (Title 24 and Title 20 of the California Code of Regulations, respectively). LAHD is responsible for design, inspection, management, and oversight of construction projects to ensure projects comply with energy efficiency requirements. The energy necessary to develop and operate the proposed facilities would be used efficiently and would represent a negligible portion of state-wide energy consumption. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

## 5.7 GEOLOGY AND SOILS

### Discussion:

a. **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less-than-Significant Impact.** The Proposed Project site is located in a seismically active area of southern California. The closest Alquist-Priolo zoned fault is the Newport-Inglewood fault zone located approximately 4.5 miles northeast of the Proposed Project site (CGS, 2023); fault rupture from this fault is not anticipated due to the fault's distance from the site. The Compton thrust fault crosses the Proposed Project site (USGS, 2023a). While this fault is a buried blind thrust fault that does not reach the surface and would not result in primary surface fault rupture in the event of an earthquake, a large earthquake on the Compton thrust fault could result in secondary fault related fractures due to underlying earthquake related folding.

Although the Proposed Project site is underlain by a blind thrust fault, and employees and trainees would be present either within the proposed buildings or outside for equipment training, all buildings would be built according to state and local building codes related to seismic safety. Incorporation of modern standard engineering and safety standards in the Proposed Project design and compliance with LAHD engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse effects on people and structures. Emergency planning and coordination would also reduce injuries to on-site personnel during seismic activity. With incorporation of emergency planning and compliance with current regulations and standard engineering practices, the Proposed Project would not cause potential substantial adverse effects involving rupture of a known earthquake fault. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- ii) **Strong seismic ground shaking?**

**Less-than-Significant Impact.** As discussed above, the Proposed Project site is located in a seismically active area of southern California with numerous on- and offshore active faults capable of generating large earthquakes and significant seismic ground shaking in the Proposed Project area. Faults in the Proposed Project vicinity include the Compton thrust fault, Cabrillo fault, Palos Verdes fault zone, and Newport-Inglewood-Rose Canyon fault zone (USGS, 2023a). Offshore

faults in the Proposed Project vicinity include the offshore sections of the Palos Verdes and Newport-Inglewood-Rose Canyon fault zones (USGS, 2023a).

The Proposed Project site may experience strong to very strong ground shaking from a large earthquake on any of these faults. The exposure of people and structures to seismic ground shaking is a potential risk with or without the Proposed Project and cannot be avoided. However, as discussed above, incorporation of modern standard engineering and safety standards in the Proposed Project design and compliance with LAHD engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse effects on people and structures. Emergency planning and coordination would also reduce injuries to on-site personnel during seismic activity. With incorporation of emergency planning and compliance with current regulations and standard engineering practices, the Proposed Project would not cause potential substantial adverse effects involving strong seismic ground shaking. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**iii) Seismic-related ground failure, including liquefaction?**

**Less-than-Significant Impact.** The Proposed Project site is located within a mapped California Geological Survey liquefaction zone (CGS, 2023). Hydraulic and alluvial fill are common in the Port and harbor areas, and in conjunction with shallow groundwater levels, these areas are subject to liquefaction and lateral spreading in the event of large earthquakes. However, incorporation of modern standard engineering and safety standards in the Proposed Project design, and compliance with LAHD engineering criteria and current Los Angeles Building and Municipal Codes would minimize adverse effects on people and structures. With incorporation of these standards and compliance with current requirements, the Proposed Project would not cause potential substantial adverse effects involving seismic-related ground failure. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**iv) Landslides?**

**No Impact.** The Proposed Project site and surrounding area are generally flat to gently sloping with some hummocky topography due to soil stockpiles and are not located within a mapped California Geological Survey landslide hazard zone (CGS, 2023). The Proposed Project site and immediately surrounding area would not be subject to landslides due to natural causes, Project construction, or seismic events. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

**b. Result in substantial soil erosion or the loss of topsoil?**

**Less-than-Significant Impact.** The Proposed Project would include grading and excavation activities during construction that would loosen soils and could contribute to surface erosion. The Proposed Project would be subject to the requirements of the National Pollution Discharge Elimination System (NPDES) Stormwater Program, which requires obtaining coverage under the General Permit for Discharges of Stormwater Associated with Construction and Land Disturbance Activities, and the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Compliance with NPDES and SWPPP requirements, including any erosion and sediment controls identified in the SWPPP, would reduce the potential for soil erosion. After construction, the Proposed Project site would be completely paved, which would prevent erosion during operation. The Proposed Project would not result in substantial soil erosion or the loss of topsoil. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**c. Be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

**Less-than-Significant Impact.** As discussed in Section 5.7(a), the Proposed Project site is generally flat to gently sloping and would not be subject to landslides. The Proposed Project site is located in an area of regional subsidence due to oil extraction (USGS, 2023b), as the site is located within the Wilmington Oil Field with 24 oil wells on site (Ninyo & Moore, 2022). However, all these oil wells are either plugged (i.e., nonoperational) oil and gas, plugged water source, or plugged multipurpose wells. Therefore, the Proposed Project would not be vulnerable to subsidence, as no extraction of petroleum products would be required as part of the Proposed Project and the plugged wells are sealed to prevent the migration of fluids (DOC, 2023c). Dewatering of surface water and groundwater during construction may be required to remove an existing alkali pond and several seasonal freshwater pools on the Proposed Project site; however, following dewatering, the areas would be backfilled, and existing soil to be retained on site would be strengthened by using a combination of surcharge and vertical wick drains to accommodate the proposed facility.

The Proposed Project site could be subject to liquefaction or lateral spreading in the event of a large earthquake on nearby or regional faults. The potential for adverse effects from liquefaction or lateral spreading would be minimized with incorporation of modern standard engineering and safety standards in the Proposed Project's design for geotechnical and structural improvements, and through compliance with LAHD engineering criteria, current Los Angeles Building and Municipal Codes, and California seismic codes and standards. With incorporation of current standards and geotechnical engineering requirements, the Proposed Project would not result in on- or off-site lateral spreading, liquefaction, or collapse. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- d. **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Less-than-Significant Impact.** Clay and silty clay materials were identified at the Proposed Project site during geotechnical sampling (EMI, 2022). Expansive soils may exist at the Proposed Project site that could result in adverse impacts on Project structures such as cracking and distress of foundations. The required geotechnical investigation to comply with County of Los Angeles and Los Angeles Department of Building and Safety building codes and design requirements would identify any expansive soils, and appropriate design measures would be incorporated as part of the Proposed Project design. Recommendations from the geotechnical investigation regarding expansive soils would be implemented in compliance with City of Los Angeles and LAHD engineering criteria, LAHD Engineering review recommendations, and the Los Angeles Building and Municipal Codes. With compliance with geotechnical recommendations, standard engineering practices, and engineering criteria and regulations, the Proposed Project would not create substantial direct or indirect risks to life or property related to expansive soils. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- e. **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No Impact.** The Proposed Project would include connections to municipal sanitary sewer lines. Septic tanks and alternative wastewater disposal would not be used. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- f. **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**No Impact.** The Proposed Project site is underlain by a mixture of interbedded sands, silts, and clays consistent with estuarine deposits in the area as well as the hydraulic fill dredge material that was used to construct adjacent islands (Ninyo & Moore, 2022). These units have no paleontological sensitivity, and therefore, proposed ground disturbing activities have no potential to damage or destroy unique paleontological resources. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

## 5.8 GREENHOUSE GAS EMISSIONS

### Discussion:

- a. **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Potentially Significant Impact.** The Proposed Project's construction and operation activities would result in temporary direct and indirect greenhouse gas (GHG) emissions from the use of fuels and electricity for various equipment and vehicles. Construction would take approximately 36 months. The Proposed Project's operations would include the use of an approximately 20,000-SF office building, 3,000-SF substation, three trailers, an approximately 5,000-SF M&R building, and heavy equipment including an STS crane, transtainer, heavy lifts, and top handlers for workforce training activities that would result in GHG emissions over the duration of the entitlement term (30 years). Additional analysis is required to determine whether the Proposed Project would generate direct and indirect GHG emissions that may have a significant impact on the environment. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- b. **Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?**

**Potentially Significant Impact.** The sources of GHG emissions caused by the Proposed Project during development of the site and operation as a training facility may have the potential to conflict with plans or policies adopted for the purpose of achieving GHG emission reductions. Therefore, impacts would be potentially significant, and this impact will be discussed in the EIR.

## 5.9 HAZARDS AND HAZARDOUS MATERIALS

### Discussion:

- a. **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less-than-Significant Impact.** The Proposed Project would involve limited transport, storage, use, and disposal of hazardous materials during construction and operation. Some examples of hazardous materials handling during construction include the transport of fuels, lubricants, and solvents associated with construction equipment, as well as the transport of contaminated soils excavated from the Proposed Project site. Contaminated soil is present on site and may be encountered during Project construction. Contaminated soil would need to be handled and disposed of at an appropriate landfill per local, state, and federal requirements. The construction contractor would prepare a Health and Safety Plan to address proper training, handling, storage, and disposal of hazardous materials used during construction.

Ninyo & Moore prepared a Stockpiled Soil and Debris Characterization Sampling Report on behalf of LAHD on May 31, 2023 (Ninyo & Moore, 2023a) and an Addendum to Stockpiled Soil Sampling Report on November 20, 2023 (Ninyo & Moore, 2023c). Soil stockpile samples contained TPH in the gasoline range organics (GRO), diesel range organics (DRO), and motor oil range organics (MRO), volatile organic compounds (VOCs), Title 22 metals, organochlorine pesticides (OCPs), polychlorinated biphenyls (PCBs), and polycyclic aromatic hydrocarbons (PAHs) that exceeded LAHD and POLB's acceptable concentrations for reuse (Ninyo & Moore, 2023a and 2023c). Some of the tested stockpiled soils exceed regulatory industrial soil screening levels but would not be classified as hazardous waste. Some stockpiled soils were identified with elevated Soluble Threshold Limit Concentration (STLC) test concentrations for copper and lead that would classify them as hazardous waste (Ninyo & Moore, 2023a and 2023c). Contaminated stockpiled soils that exceed regulatory industrial screening levels, but are not classified as hazardous waste would need to be identified and removed from the site and disposed of at an appropriate landfill per local, state, and federal requirements. All hazardous soils removed offsite would need to be accompanied by a waste manifest, which is reported to the California Department of Toxic Substances Control (DTSC). Grading and excavation for the Proposed Project could expose construction workers to hazardous materials in stockpiled soils. Construction workers would maintain proper HAZWOPER training and be qualified to work with contaminated materials.

Concrete stockpile samples contained low levels of Title 22 metals, VOCs, PCBs, and asbestos, all of which were below the hazardous waste screening criteria for waste characterization purposes. The report recommended that the sampled concrete stockpile materials be characterized as non-hazardous for waste disposal purposes or be crushed and used as crushed miscellaneous base beneath pavement during site construction (Ninyo & Moore, 2023a).

Hazardous materials that could be used during Proposed Project operation include lubricants, solvents, acids, and fuels for the training equipment and vehicles. When not in use, these hazardous materials would be stored in approved containers and in a proper manner to prevent drainage, leaks, or accidents as required by State and local regulations. Construction and operational equipment would be refilled or refueled in areas away from high-traffic areas and near a spill containment kit or containment kit area. With compliance with standard safety measures, hazardous waste regulations, and the requirement that construction workers maintain proper HAZWOPER training, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- b. **Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

**Potentially Significant Impact.** As described under the discussion for Section 5.9(a), the Proposed Project's construction and operation activities would require the limited use of hazardous materials, such as fuels, lubricants, and solvents. The storage and use of hazardous materials during construction and operation could result in the accidental release of hazardous materials typically associated with minor spills or leaks. Spills and leaks of hazardous materials during construction or operation could result in contamination of soil or the adjacent harbor if not cleaned up quickly or completely. In addition, Project construction may expose construction workers and the environment, including soil, groundwater, and the harbor, to hazardous materials/waste. During storm events, spills or leaks of hazardous materials could infiltrate soils causing contamination of underlying soil or the groundwater, or runoff into the harbor and adversely affect harbor water quality and marine life. During Project operation, spills or leaks would not infiltrate soils, as all land-based operations would take place on paved surfaces. Some of the stockpiled soils on the Proposed Project site contain contaminated soils that exceed industrial regulatory screening levels, and some soils were found to have contamination levels that would classify them as hazardous waste (Ninyo & Moore, 2023a).

Additionally, the EDR database and GeoTracker website did identify one open California Cleanup Program site immediately adjacent to and north of the Proposed Project site (EDR, 2023; SWRCB, 2023c). The Cleanup Program site is identified as a former oil field and oil field waste disposal landfarm, which was in operation between 1948 and 1970 (URS, 2009). At this site, oil field wastes and liquids were disposed of into 19 shallow, below-ground, clay-lined impoundments (sumps) in a manner that reportedly did not conform to the site disposal permits (URS, 2009). The sump areas were excavated in 2008 and 2009 and backfilled with clean import soils; a total of approximately 234,880 cubic yards of contaminated soil was removed (URS, 2009). The oil wells on the site were capped and pipelines relocated prior to site excavation (URS, 2009). Although unlikely, contamination from this site may have a small potential to migrate to the Proposed Project site with seasonal or tidal movement of shallow contaminated groundwater.

Grading and excavation for the Proposed Project could expose workers or the environment to hazardous materials or waste if a release of these substances occurs. Additional analysis is required to determine whether the Proposed Project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- c. **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**No Impact.** No schools are within one-quarter mile of the Proposed Project site. The nearest schools, Wilmington Park Elementary School and George De La Torre Junior Elementary School, are located approximately 1.1 miles north and northwest of the Proposed Project site, respectively. No impact would result from the Proposed Project, and this issue will not be addressed further in the EIR.

- d. **Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**No Impact.** The Proposed Project site is not listed on any of the CalEPA Cortese List Data Resources,<sup>2</sup> including the DTSC EnviroStor website (DTSC, 2023), the State Water Resources Control Board (SWRCB) GeoTracker website (SWRCB, 2023a), and SWRCB Cease and Desist Orders and Cleanup and Abatement Orders list (SWRCB, 203b). Additionally, the site is not listed in any environmental databases (EDR, 2023). Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- e. **For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

**No Impact.** The closest airports to the Proposed Project site are the Torrance Municipal Airport – Zamperini Field, located over 5 miles to the north-northwest; and the Long Beach Airport, located approximately 6 miles to the northeast. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- f. **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less-than-Significant Impact.** While most construction activities would take place outside of public roadways, periodic temporary construction or maintenance activities, such as transport of heavy equipment, may temporarily block lanes. The Proposed Project would not physically interfere with an adopted emergency response plan, as coordination with both the Los Angeles Fire Department and the Los Angeles Port Police would be conducted prior to construction activities. Emergency access in the vicinity of the Proposed Project site would be maintained for emergency service vehicles during construction activities, as construction traffic would be intermittent during construction

<sup>2</sup> <https://calepa.ca.gov/sitecleanup/corteselist/>

hours throughout the 36-month construction period. Road closures are not anticipated during construction activities. The Proposed Project is not expected to increase demand on existing emergency response services during construction or operation and is not expected to substantially affect traffic circulation or disrupt emergency response or evacuation. The Proposed Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

**No Impact.** The Los Angeles Fire Department (LAFD) provides fire protection services within the Port. The Proposed Project is not located within the wildland-urban interface area (i.e., the zone of transition between undeveloped land with vegetative fuels and human development). Additionally, the Port and Proposed Project area are listed as “not burnable” on the US Forest Service Wildfire Hazard Potential website (USFS, 2020). No wildland fires have the potential to occur in the Proposed Project area. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

## **5.10 HYDROLOGY AND WATER QUALITY**

### **Discussion:**

**a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality?**

**Less-than-Significant Impact.** Best management practices (BMPs) would be implemented in accordance with SWPPP requirements related to construction to comply with the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (General Permit) (CGP) and any subsequent iterations for stormwater discharges associated with construction. Implementation of BMPs in accordance with the SWPPP would reduce erosion, siltation, and the potential for accidental or incidental discharges to the storm drain or harbor waters. The Proposed Project would include construction of a storm drain system to convey stormwater flows off site during operations.

Proposed Project operations would adhere to the Regional Water Quality Control Board (RWQCB) Stormwater Industrial General Permit (IGP) and proposed Commercial, Industrial, and Institutional (CII) Permit, as applicable, to reduce the potential for accidental or incidental discharges to the storm drain and harbor waters. By complying with required permits, the potential for discharges that could affect water quality would be substantially reduced, and as a result, Proposed Project construction and operation would not violate

any water quality standards or waste discharge requirements or substantially degrade surface water or groundwater quality. Therefore, potential impacts would be less than significant, and this issue will not be further addressed further in the EIR.

- b. **Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**No Impact.** Groundwater in the harbor area is located south of the Dominguez Gap Barrier and experiences seawater intrusion from the San Pedro Bay, rendering it unsuitable for potable uses. Further, the Proposed Project site is not used or designated for groundwater recharge. Excavation may be necessary for construction of Project components. Because the Proposed Project site is not used for groundwater recharge or other groundwater-related beneficial uses, paving of the site would not interfere with groundwater recharge. The Proposed Project may require dewatering of groundwater but would not require the use of groundwater during construction or operations. The Proposed Project would not impede sustainable groundwater management of the basin. Therefore, the Proposed Project would have no impacts, and this issue will not be addressed further in the EIR.

- c. **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

- (i) **result in substantial erosion or siltation on- or off-site;**

**Less-than-Significant Impact.** The Proposed Project would have no impact on the course or configuration of any water body because no streams or rivers are within the Proposed Project site. Earthen berms are located to the south and west generally along the boundaries of the Proposed Project site. The Proposed Project site would be graded and paved, and stormwater flows would be conveyed to the storm drain system. Any excess soil material left over after grading would be used to construct an earthen berm wall along the perimeter of the Proposed Project site.

The Proposed Project would increase impervious areas through new paved surfaces. The Proposed Project site would be compacted and graded as part of site preparation, which would alter the site's existing draining pattern. Construction would comply with the stormwater-related requirements in the NPDES Permit, including the use of BMPs, which would minimize the amount of runoff and the potential for substantial erosion or siltation. During construction, contractors would develop and follow a SWPPP compliant with the requirements of the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities CGP and any subsequent iterations for stormwater discharges associated with construction. Compliance with this construction SWPPP, including any erosion and sediment controls identified in the SWPPP, would further reduce potential impacts.

During operation, the Proposed Project would be covered under the Los Angeles County RWQCB Stormwater Permits, including the IGP and the proposed CII Permit, as applicable. After construction is completed, the Proposed Project's drainage would be handled by the new storm drain system, which would convey stormwater off site. As required under the IGP, a SWPPP would be developed and employed, and would include measures to reduce pollutants from entering the storm drain system. With compliance with the SWPPP and new stormwater drainage plan, the Proposed Project would not substantially alter the existing drainage pattern of the site in a manner which would result in substantial erosion or siltation on or off site. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**(ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;**

**Less-than-Significant Impact.** The Proposed Project would not change the vulnerability of the Proposed Project site to flooding because the site would be higher in elevation than the surrounding area, and the Proposed Project would not remove barriers to flooding since no barriers are located on the site. The Proposed Project would include the installation of impervious paving after grading and compacting, resulting in a potential for increased surface runoff. However, the site would be graded to direct surface runoff towards the proposed storm drain system, thereby reducing the potential for flooding on or off site. The Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**(iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**

**Less-than-Significant Impact.** The Proposed Project has the potential to increase stormwater runoff with the addition of new impervious areas, and stormwater runoff may contain particulate matter or industrial chemicals that could enter harbor waters. Hazardous material has the potential to enter harbor water during construction, particularly during mobilization of construction vehicles, equipment, and delivery of training equipment if contaminants leak from vehicles and equipment onto Anchorage Road and Shore Road, which are adjacent to the marinas. During construction, contractors would develop and follow a SWPPP compliant with the requirements of the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities CGP and any subsequent iterations for stormwater discharges associated with construction.

During operation, the Proposed Project would require coverage under the IGP and proposed CII permit, as well as development of a new project-specific SWPPP. Compliance with these requirements would reduce the potential for polluted runoff to enter into harbor water.

LAHD would also grade the Proposed Project site such that storm flows would not enter harbor water as runoff during construction and operations. The Proposed Project would not exceed the capacity of the new stormwater drainage systems nor create substantial additional sources of polluted runoff. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**(iv) Impede or redirect flood flows?**

**Less-than-Significant Impact.** The Proposed Project site is within Federal Emergency Management Agency (FEMA) Zone X, in which it is an area with reduced flood risk due to being outside the 500-year flood zone and protected from the 100-year flood by levee (FEMA, 2021). The Proposed Project site is currently relatively flat with inclines in the southeast, eastern, and northeastern corners and central-western portion of the site. Earthen berms are located to the south and west generally along the boundaries of the Proposed Project site. Any excess soil material left over after grading would be used to construct a berm wall along the perimeter of the Proposed Project site. The Proposed Project would also include grading and compacting soils at the site to provide a level site for new structures, utility systems, and pavement. These features would not substantially impede or redirect flood flows. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

**Less-than-Significant Impact.** The Proposed Project site is within FEMA Zone X, as discussed under Section 5.10(c)(iv) (FEMA, 2021), and is not within a flood hazard zone. Although no lakes or other large, enclosed water bodies are near the Proposed Project site, small seiches have occurred within the San Pedro Bay Port Complex. According to the California Department of Conservation (DOC), the Proposed Project site is located within a tsunami hazard zone (DOC, 2023d). However, the *Tsunami Hazard Assessment for the Ports of Los Angeles and Long Beach* (Moffatt & Nichol, 2007) modeled the possibility of tsunami propagation into the Ports and concluded that a tsunami caused by local seismic activity, or an underwater landslide would be unlikely to occur more than once every 10,000 years.

Although the Port has historically been subjected to seiches and tsunamis, the Proposed Project site is within the inner portion of the harbor complex, adjacent to the East Basin and Cerritos Channel, and would be protected by Terminal Island to the south. Inundation of the Proposed Project site is not anticipated, and the Proposed Project would not risk release of pollutants due to project inundation. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**No Impact.** Responsibility for the protection of surface water and groundwater quality in California rests with the SWRCB and nine RWQCBs. According to regulatory requirements and as part of its management of stormwater runoff, construction of the Proposed Project would require a SWRCB CGP, and operations would require coverage under the IGP, proposed CII permit, and development of a new project-specific SWPPP. These regulatory requirements would minimize pollutant loading. The Proposed Project would not interfere with any water quality or groundwater management plan. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

## **5.11 LAND USE PLANNING**

### **Discussion:**

**a. Would the project physically divide an established community?**

**No Impact.** The Proposed Project site is located in an industrial area that does not contain any established communities. The physical division of an established community typically refers to the construction of a linear feature, such as a major highway or railroad tracks or removal of a means of access, such as a local road or bridge that would impair mobility within an existing community or between a community and outlying area. Under existing conditions, the Proposed Project site is not used as a connection between established communities. Instead, connectivity in the surrounding area is facilitated via local roadways, such as SR-47 and I-110. The Proposed Project site is located on an existing unoccupied parcel, and the Proposed Project would include construction and operation activities that would alter the primary use of the site. However, the proposed use would not physically divide an established community or disrupt existing uses in the surrounding area. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- b. **Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

**Potentially Significant Impact.** The Proposed Project site is governed by the PMP, the City of Los Angeles Port of Los Angeles Plan, and City of Los Angeles zoning ordinances and codes. The Proposed Project parcel is zoned qualified light industrial ([Q]M2-1) and Heavy Industrial (M3) under the City of Los Angeles Zoning Ordinance and would not conflict with zoning (City of Los Angeles, 2023).

The Proposed Project site is located in the PMP's Planning Area 2, which encompasses the West Basin and Wilmington areas and includes Berths 96-204. This planning area's uses include container terminals, breakbulk, liquid and dry bulk, maritime support, institutional, recreational boating, and open space. The Proposed Project site is located within the Open Space land use designation as indicated in the PMP (LAHD, 2018). PMP Section 5.4.4 states that the Proposed Project site was planned for development as passive open space with native habitats, wetlands, turf, hardscapes, and numerous trails. Per the PMP, a Plan amendment is required if a new land use is proposed on a site that is inconsistent with its land use designation(s). The proposed new institutional use at the site would not be consistent with the existing Open Space PMP designation, and a PMP Amendment would be necessary to change the land use from Open Space to Institutional. Because the Proposed Project would not be consistent with the existing PMP designation, the Proposed Project would conflict with the PMP. Additional analysis is required to determine if the Proposed Project would cause a significant environmental impact due to this conflict with the PMP. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

## 5.12 MINERAL RESOURCES

### Discussion:

- a. **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?**

**Less-than-Significant Impact.** According to the California Geologic Energy Management Division (CalGEM) Well Finder tool, although approximately 30 wells are located within the Proposed Project site boundaries, none are active; all wells within the Proposed Project site are either plugged (i.e., permanently nonoperational) oil and gas, plugged water source, or plugged multipurpose wells (Figure 2-3) (CalGEM, 2023). Five active oil and gas wells are located approximately 200 to 300 feet to the north and east of the Proposed Project site, and six idle (i.e., not producing oil or natural gas for a period of 24 consecutive months) oil and gas and observation wells are located more than 300 feet to the east of the Proposed Project site (CalGEM, 2023). Although the Proposed Project site is located in a Mineral Resource Zone according to the City of Los Angeles General Plan Conservation Element, the Proposed Project site is not currently being used to extract

minerals (City of Los Angeles, 2001). The Proposed Project would not conflict with existing oil extraction land uses or prevent future oil extraction as the existing wells are inactive and plugged. The Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the State. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

**Less-than-Significant Impact.** As described in Section 5.12(a), the Proposed Project site is located within a Mineral Resource Zone and contains plugged oil and gas wells that are inactive and not currently used for mineral extraction. The Proposed Project would not conflict with existing oil extraction land uses or prevent future oil extraction. The Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

### 5.13 NOISE

#### Discussion:

- a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Potentially Significant Impact.** Project construction activities are estimated to take approximately 36 months to complete. Construction activities could result in temporary increases in ambient noise levels in the Proposed Project area from use of various equipment, such as trucks, tractors, scrapers, rollers, dozers, graders, excavators, dump trucks, etc. as described in the Project Description in Section 2.3.1. Maximum noise from these types of equipment ranges from 76 A-weighted decibels (dBA) to 85 dBA at 50 feet from the source (FHWA, 2006). Although there are no residential zones on Port property, there is a possibility of liveaboard tenants on boats at the marinas to the north, south, and west of the Proposed Project site. Subject to further investigation, the nearest potential residential receptors could be approximately 170 feet to the west.<sup>3</sup>

Operations at the Workforce Training Facility would take place on Monday through Friday between 7:00 a.m. and 5:00 p.m. regularly with night shift training between 6:00 p.m. and 3:00 a.m. Night shift training would be required to be conducted after 10:00 p.m. within

<sup>3</sup> At the time of preparation, liveaboard data was unavailable, so this NOP/IS assumed liveaboards occupied the closest boat slips to the Proposed Project.

the parameters of the City's noise ordinances. Operational activities would include employee and trainee trips to the site, involving the use of training equipment such as cranes, transtainer, top handlers, side pick, heavy lifts, forklifts, UTRs, payloaders, and winch.

Considering the relatively close proximity of potential sensitive receptors, noise levels during construction may be perceptible to these receptors. In addition, as no activities are currently being conducted at the site, operations at the Workforce Training Facility would represent an increase in the ambient noise conditions of the area. Additional analysis is required to determine whether the Proposed Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

**b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?**

**Potentially Significant Impact.** Vibration-sensitive land uses include high-precision manufacturing facilities or research facilities with optical and electron microscopes. None of these are located in the Proposed Project area. Therefore, the significance threshold for "excessive ground-borne vibration" depends on whether a nuisance, annoyance, or physical damage to any buildings could result from the Proposed Project. The City of Los Angeles does not specify a significance criterion for vibration, but Caltrans developed guidelines for construction activities and estimates that vibration levels exceeding 0.3 inches per second (in/sec) can damage older residential structures and cause substantial annoyance to humans (Caltrans, 2020). Existing buildings are located south of the site at the marinas. Due to the proximity of these buildings and the level of construction activities anticipated to be completed at the Proposed Project site, the Proposed Project could exceed Caltrans guidelines for building damage and human annoyance. Additional analysis is required to determine whether the Proposed Project could result in generation of excessive groundborne vibration or groundborne noise levels. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- c. **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

**Less-than-Significant Impact.** The Proposed Project site is not located within an airport land use plan. The nearest public airports are Torrance Municipal Airport – Zamperini Field, located over 5 miles to the north-northwest; and Long Beach Airport, located approximately 6 miles to the northeast. Given the distance between the Proposed Project site and the identified airports, construction workers, employees, and trainees at the Proposed Project site would not be exposed to excessive noise levels from airplanes. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

## 5.14 POPULATION AND HOUSING

### Discussion:

- a. **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**Less-than-Significant Impact.** The Proposed Project would not include development of any new residential facilities, extension of any roads, or development of other growth-accommodating infrastructure. However, the Proposed Project would include the development of a new training facility that would require workers during construction and operation, as well as involve visits from trainees in the maritime and goods movement industries. A peak of approximately 50 workers per day would be employed for the 36-month construction period (LAHD, 2023b, 2023c). Up to 150 full-time and part-time employees would work at the site in one shift during operations; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b).

The Proposed Project site is within the Port and proximate to a well-established, heavily populated urban community that provides sufficient existing housing stock and established infrastructure. Additionally, an adequate supply of workers is assumed to be in the vicinity of the Proposed Project site given the urban setting. The proposed Workforce Training Facility would encourage the existing local workforce to utilize its training programs.

The population of the City of Los Angeles is expected to grow by approximately eight percent between 2020 and 2030, and this growth has been planned for in the General Plan Housing Element (City of Los Angeles, 2021). While the Proposed Project would address the existing labor shortage in the cargo industry by attracting new workers and providing new opportunities for up-skilling or re-skilling for existing workers, the majority of the Proposed Project's workers and trainees would likely come from the existing local workforce, and the number of those requiring relocation would be negligible compared to

the City's projected population growth. Trainees and trainers would primarily commute from the Greater Los Angeles area. The Proposed Project would not induce substantial unplanned population growth in the area either directly or indirectly. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** No housing is present within the boundaries of the Proposed Project site that would be displaced, and no replacement housing would be necessary. No approved residential housing is located within the Port,<sup>4</sup> although liveaboard tenants may potentially be on boats at the marinas to the north, south, and west of the Proposed Project site. The Proposed Project would not displace the marina liveaboards, if any. The Proposed Project would not result in the displacement of any people or housing or necessitate the construction of replacement housing elsewhere. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

## **5.15 PUBLIC SERVICES**

### **Discussion:**

**Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:**

**a. Fire Protection?**

**Less-than-Significant Impact.** LAFD provides fire protection and paramedic services within the City and the Port. LAFD Station 49 (400 Yacht Street, Wilmington), which is located west of the Proposed Project site across East Basin, is the nearest fire station that would provide fire protection and paramedic services to the Proposed Project site.

Emergency access in the vicinity of the Proposed Project site would be maintained for emergency service vehicles during construction and operation activities, as construction traffic would be intermittent and temporary during construction hours, and road closures, if necessary, would also be temporary during construction activities. In addition, no new or altered fire protection services would be required during construction and operation as a result of population growth.

<sup>4</sup> Residential housing is not a permitted use at the Port of Los Angeles under the state's Tidelands grants.

As discussed in Section 5.14(a), the Proposed Project would not directly or indirectly induce unplanned population growth in the City, and thus, would not necessitate new or altered fire protection facilities. Therefore, the existing LAFD Station 49 is anticipated to be able to adequately serve the Proposed Project. Although the Proposed Project could potentially result in a slight increase in demand for emergency service due to the workforce training activities at the site, this increase is expected to be limited as operational activities would comply with State and City fire codes, standards, and regulations. The Proposed Project would not affect service ratios, response times, or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**b. Police Protection?**

**Less-than-Significant Impact.** The Los Angeles Port Police (Port Police) provides the primary law enforcement and security for the Port including 7,500 acres along 43 miles of waterfront (POLA, 2023c). The Port Police headquarters is located approximately 2.8 miles southwest of the Proposed Project site at 330 South Centre Street, Los Angeles. The Port Police Dive Unit facility boats and offices/lockers are located approximately 2.5 miles southwest of the Proposed Project site at 954 South Seaside Avenue, Los Angeles. Additionally, the Los Angeles Police Department (LAPD) provides law enforcement for 21 community areas including San Pedro (LAPD, 2023). The Proposed Project site is located within the LAPD Harbor Division Area, which covers 27.5 square miles including Harbor City, Harbor Gateway, San Pedro, Wilmington, and Terminal Island (LAPD, 2021).

Similar to fire protection services, the Proposed Project site is already within the Port Police and LAPD service areas, and once operational, would continue to be served. As discussed in Section 5.14(a), the Proposed Project would not directly or indirectly induce unplanned population growth in the City, and therefore, would not substantially increase the demand for new police protection services. The Proposed Project would not affect service ratios, response times, or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**c. Schools?**

**Less-than-Significant Impact.** The need for new schools is generally associated with an increase in the school-aged population or a decrease in the accessibility and availability of existing schools. The additional employees hired for construction and operation of the Proposed Project would likely come from the local regional area, and any of the employees' and trainees' school-age children would likely already attend schools in the vicinity.

The majority of trainees are expected to already reside in the area; the number of new trainees moving into the area whose school-age children would attend local schools would result in a negligible increase in the school-aged population. A substantial increase in school-age children requiring public education is not expected to result from the Proposed Project.

The Proposed Project would not affect service ratios or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**d. Parks?**

**Less-than-Significant Impact.** The Proposed Project would not include development of new parks or cause a reduction in existing park facilities. Although the PMP land use designation is Open Space, the Proposed Project site was used as industrial open space for industrial material storage and was never used as a recreational open space or park for area residents.<sup>5</sup> Furthermore, the Proposed Project site would be confined to the Port and would not induce substantial population growth that would increase demand for parks. The Proposed Project would not affect service ratios or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**e. Other Public Facilities?**

**Less-than-Significant Impact.** As previously discussed in Section 5.14(a), the Proposed Project would not include development that would induce substantial unplanned population growth causing an increase in the use of libraries, community centers, hospitals, or other public facilities. The majority of the Proposed Project's workers and trainees would likely come from the existing local workforce, and the number of those requiring relocation would be negligible compared to the City's projected population growth. A substantial increase in use of these public facilities is not anticipated as a result of the Proposed Project. The Proposed Project would not affect service ratios or other performance objectives requiring the provision or need for new or physically altered governmental facilities that would cause substantial adverse physical impacts. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

<sup>5</sup> There are no residential zones located on Port property.

## 5.16 RECREATION

### Discussion:

- a. **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

**No Impact.** An increased demand for neighborhood or regional parks and other recreational facilities is generally associated with an increase in permanent residents. As discussed in Section 5.14(a), the Proposed Project would not include the development of new residential facilities, and no substantial population growth would result from the Proposed Project activities. Therefore, no increase in the use of existing neighborhood and regional parks or other recreational facilities is anticipated, and no substantial physical deterioration of existing facilities would result from the Proposed Project. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- b. **Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?**

**No Impact.** The Proposed Project would include the construction and operation of a facility to train the workforce at the Ports of Los Angeles and Long Beach. The Project would not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

## 5.17 TRANSPORTATION

### Discussion:

A project in the Port is considered to have a significant transportation/circulation impact if the project would result in one or more of the occurrences listed in Appendix A (2022 LADOT TAG Plan Consistency Worksheet). These criteria are based on the CEQA Guidelines Appendix G and the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG) (LADOT, 2022), and are used as the basis for determining the impacts of the Proposed Project and alternatives under CEQA.

For the purposes of this NOP/IS, impacts of the Proposed Project were qualitatively assessed relative to potential conflicts with area plans, design features, and emergency access, and will be quantitatively assessed relative to vehicle miles traveled (VMT) as prescribed by the LADOT Transportation Assessment Guidelines, in the EIR.

**a. Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

**No Impact.** The TAG states that a project that “generally conforms with and does not obstruct the City’s development policies and standards will generally be considered to be consistent” and is not in conflict with applicable programs, plans, ordinances, or policies addressing the circulation system. The 2022 LADOT Transportation Assessment Guidelines include three screening criteria questions to help determine whether a project conflicts with City of Los Angeles circulation system policies.

If the answer is “no” to all of the following questions, a “no impact” determination can be made for this threshold (LADOT, 2022).

If the Proposed Project requires a discretionary action, and the answer is yes to any of the following questions, further analysis will be required to assess whether the Proposed Project would conflict with plans, programs, ordinances, or policies:

- (i) Does the project require a discretionary action that requires the decision maker to find that the decision substantially conforms to the purpose, intent and provisions of the General Plan?

The Proposed Project requires approval by the Board of Harbor Commissioners, which is a discretionary action. However, this discretionary action does not require the decision maker to amend any project component to conform to the purpose, intent, or provision of any existing general plan. Therefore, the Proposed Project would comply with all required City of Los Angeles circulation system policies and does not deviate from any general plan.

- (ii) Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?

The Proposed Project would not alter existing transportation routes or transportation options, nor would it alter public access. Direct landside access to the Proposed Project site is provided via Shore Road. The Proposed Project would not require any substantial modifications to the public right-of-way. Utility connections would require in-street construction activities; however, street closures would be temporary and would not adversely affect the circulation system.

The 2022 LADOT TAG includes a “Plan Consistency Worksheet” which provides questions that must be answered in order to help guide whether the project conflicts with City circulation policies (see Appendix A). The worksheet, along with the discussion above, demonstrate that the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, for transit, roadway, and pedestrian. However, further analysis of question a(ii) for bicycle parking will be conducted as part of the EIR.

- (iii) Is the project required to or proposing to make any voluntary modifications to the public right-of-way (i.e., dedications and/or improvements in the right-of-way, reconfigurations of curb line, etc.)?

The Proposed Project does not include any modifications to existing roadways that support current or future bike lanes or bus stops and is not required to make any voluntary or required modifications to the public right-of-way. The Proposed Project does not include dedications or physical modifications to the public right-of-way, nor is it required.

The Proposed Project has no impact based on the above three criteria. Therefore, no impacts would occur, and this impact will not be evaluated further in the EIR.

- b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1)?**

**Potentially Significant Impact.** The intent of this threshold is to assess whether the Proposed Project would cause substantial VMT.

Based on the project description, up to 150 full-time and part-time employees would work at the site in one shift during operations; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b). The Proposed Project operation would generate automobile trips that are higher than the LADOT Transportation Assessment Guidelines threshold of 250 or more daily automobile vehicle trips (LADOT 2022) during operation of the Proposed Project, and thus requires further VMT analysis. The VMT analysis would entail an evaluation of the trip generation and average trip lengths, typical for the trainers and trainees (Port labor). This issue will be further evaluated and addressed in the EIR.

- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**No Impact.** Impacts regarding the potential increase of hazards due to a geometric design feature relate to the design of access points to and from the Proposed Project site.

The Proposed Project's construction activities would be primarily limited to the site boundaries and would not enter into the public right-of-way. Existing access to the site would be maintained by adherence to a project-specific construction traffic management plan that would be approved by LAHD. Pedestrian access, bus routes, and metered parking do not exist on the streets adjacent to the site.

The Proposed Project's access driveways are designed to safely accommodate vehicles without any impacts to the public right-of-way. Also, as previously discussed, the Proposed Project is not proposing or required to make any modifications to the public right-of-way, and therefore, a No Impact determination can be made. The adjacent public roadway access for the Proposed Project site would be via the intersection of Henry Ford Avenue/Pier A Way/SR-47 Ramps. For information purposes only, traffic operating conditions will be analyzed for this intersection to demonstrate sufficient site access in the EIR.

**d. Result in inadequate emergency access?**

**No Impact.** The Proposed Project would not alter or close existing roadways or access roads, or block emergency access points. Emergency access would be unchanged by the Proposed Project. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

## **5.18 TRIBAL CULTURAL RESOURCES**

### **Discussion:**

**a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- (i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or**

**No Impact.** On March 13, 2023, notification letters were sent to California Native American Tribes with cultural affiliations with the Proposed Project site. No requests for consultation were received from any of the notified tribes within the 30-day response time. The Proposed Project is unlikely to cause a substantial adverse change to Tribal Cultural Resources, as the Proposed Project area is underlain by a variable mix of sands, silts, and clay consistent with the estuarine deposits in the area and the hydraulic fill dredge material used to construct the nearby islands (Ninyo & Moore 2022). Due to the unlikely chance of encountering historical prehistoric age resources and because no additional resources were identified by tribes, the Proposed Project would not cause any changes in the significance of a Tribal Cultural Resource. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

- (ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

**No Impact.** As discussed in Section 5.18(a)(i), no requests for consultation were received from any of the notified tribes within the 30-day response time, and the Proposed Project site has a low likelihood of containing historical prehistoric age resources due to dredge material onsite and the previous construction disturbance. The CEQA lead agency, in its discretion, has not identified any Tribal Cultural Resources in the Proposed Project area. The Proposed Project would not cause any changes in the significance of a Tribal Cultural Resource. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

## 5.19 UTILITIES AND SERVICE SYSTEMS

### Discussion:

- a. **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Less-than-Significant Impact.** The Proposed Project would require installation of new utility systems to support the increased demand for electrical, sewer, water, storm drain, and telecommunication systems. These additional utility systems would connect to existing utility infrastructure within the surrounding area; therefore, any utility improvements would be limited to the Proposed Project site. Although the Proposed Project would cause increased demand for utility services, the Proposed Project would not substantially increase the area's population such that these service systems would require relocation or expansion, causing significant environmental effects. Additionally, the surrounding area is highly developed and already served by utility facilities. The existing water infrastructure would be adequate to serve the Proposed Project. In addition, the existing power supply infrastructure would be adequate to serve the proposed uses, as LADWP has an 8,019-megawatt electric capacity for the City of Los Angeles (LADWP, 2023). No additional utility infrastructure would be required outside of the Proposed Project limits to accommodate the Proposed Project's utility needs.

The Proposed Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities beyond the limits of the Proposed Project site causing significant environmental effects. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

**b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**Less-than-Significant Impact.** Construction of the Proposed Project would temporarily require water supplies for activities such as compaction, grading, and dust control that would be obtained from the municipal water supply. Water use during construction would be temporary, occurring mainly for earthwork improvements during Phase 1 for approximately 12 months. Water use during Phase 2 would be limited to activities such as concrete production for building foundations and pavement. Water use during operations would consist of typical municipal water use at the facility. Up to 150 full-time and part-time employees in addition to up to 300 trainees would not substantially increase demand for water compared to the overall demand within the Port. The project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, potential impacts would be a less than significant, and this issue will not be addressed further in the EIR.

**c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

**Less-than-Significant Impact.** The Proposed Project site is serviced by the City of Los Angeles Sanitation District's (LASAN) Terminal Island Water Reclamation Plant (TIWRP). The TIWRP serves the Harbor Area (Terminal Island, San Pedro, Harbor City, and Wilmington) in the City of Los Angeles and has the capacity to treat up to 30 million gallons of municipal and industrial flows daily (LASAN, 2023a). The Proposed Project would generate domestic wastewater from restrooms and offices. A peak of approximately 50 workers per day would be employed for the 36-month construction period (LAHD, 2023b, 2023c). During operation, up to 150 full-time and part-time employees would work at the site; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b). This increase in wastewater production would not be substantial given the TIWRP's treatment capacity and the Proposed Project's compliance with the LASAN Wastewater Permit. Additionally, as previously discussed in Section 5.14(a), the Proposed Project would not directly or indirectly induce population growth in the area. Therefore, the Proposed Project would not exceed or substantially alter wastewater treatment requirements of the City's sewage collection and treatment system per the Los Angeles Municipal Code Industrial Waste Control Ordinance (LASAN, 2023b).

Although the Proposed Project would be a new use at the existing unoccupied site, the TIWRP would have adequate capacity to treat the temporary wastewater generated during construction and permanent wastewater generated during operation. The Proposed Project would not result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the Proposed Project's projected demand in addition to existing commitments. Therefore, potential impacts would be less than significant, and this issue will not be addressed further in the EIR.

- d. **Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Less-than-Significant Impact.** The Proposed Project's construction activities would temporarily generate solid waste associated with grading and removal of existing debris, including contaminated soil, concrete slabs, asphalt, gravel, cobbles, boulders, piping, used tires, ceramic tiles, and a large roll-off waste bin. Construction would generate the majority of solid waste. This waste would be hauled and disposed of at a County of Los Angeles-approved waste disposal facility. Due to the hazardous nature of some of the existing soil stockpiles on site, exported stockpiles are not anticipated to be recycled and would be disposed of at a suitable hazardous waste disposal site. During operation, solid waste generated by the Proposed Project would be limited to trash from on-site employees. Up to 150 full-time and part-time employees would be employed for operation of the Proposed Project; in addition, up to 300 trainees are anticipated to visit the site per day but not at the same time (LAHD, 2023b). This number of employees relative to the regional context of the population of Southern California would generate limited amounts of solid waste. The Proposed Project would not generate solid waste in excess of State or local standards or impair solid waste reduction goals. Therefore, impacts would be less than significant, and this issue will not be addressed further in the EIR.

- e. **Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less-than-Significant Impact.** The Proposed Project would be required to conform to the policies and programs of the Solid Waste Integrated Resources Plan (SWIRP). The SWIRP proposes an approach for the City to achieve a goal of 90 percent solid waste diversion by 2025 (LASAN, 2023b). Compliance with the SWIRP would ensure sufficient permitted capacity to service the Proposed Project. As discussed in Section 5.19(d), solid waste associated with construction activities would be disposed of at a County of Los Angeles-approved waste disposal facility. The Proposed Project would comply with federal, state, and local statutes and regulations related to solid waste, as construction-generated waste would be disposed of at suitable facilities. More specifically, the Proposed Project would be compliant with all applicable codes pertaining to solid waste disposal. These codes include Chapter VI Article 6 Garbage, Refuse Collection of the LAMC, Part 13 Title 42 - Public Health and Welfare of the California Health and Safety Code, and Chapter 39 - Solid Waste Disposal of the United States Code.

The Proposed Project would also be compliant with Assembly Bill (AB) 939, the California Solid Waste Management Act, which requires each city in the state to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. AB 341 builds upon AB 939 and requires jurisdictions to implement mandatory commercial recycling with a statewide 75 percent diversion rate from landfill disposal. The Proposed Project would include implementation of and be consistent with the procedures and policies detailed in these codes, the City's recycling and solid waste diversion efforts, and related laws pertaining to solid waste disposal. Therefore, impacts would be less than significant, and this issue will not be addressed further in the EIR.

## 5.20 WILDFIRE

### Discussion:

**If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:**

- a. **Substantially impair an adopted emergency response plan or emergency evacuation plan?**
- b. **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?**
- c. **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**
- d. **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No Impact.** PRC Sections 4201-4204 direct the California Department of Forestry and Fire Protection to map fire hazard based on relevant factors such as fuels, terrain, and weather. The Port is not located in or near a state responsibility area or lands classified as a Very High Fire Severity Zone within its Local Responsibility Area (CAL FIRE, 2023). Additionally, as discussed in Section 5.9(g), the Port and Proposed Project area are listed as "not burnable" on the US Forest Service Wildfire Hazard Potential website (USFS, 2022). The Proposed Project site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. Therefore, the Proposed Project would result in no impacts, and this issue will not be addressed further in the EIR.

## 5.21 MANDATORY FINDINGS OF SIGNIFICANCE

### Discussion:

- a. **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

**Potentially Significant Impact.** As discussed in Section 5.4 (Biological Resources), three special-status species were observed, and several additional species of special status plants and animals have potential to be present within the Proposed Project site. Additional analysis is required to determine with the Proposed Project has the potential to reduce the habitat of wildlife species, cause a wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

The Proposed Project would involve ground disturbing activities. The area is developed and has been previously disturbed, and the site is underlain by artificial fill. As discussed in Section 5.5 (Cultural Resources), earthwork during Phase 1 of construction may encounter unknown buried resources. Additional analysis is required to determine whether the Proposed Project has the potential to eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be potentially significant, and this issue will be addressed further in the EIR.

- b. **Does the project have impacts that are individually limited but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**

**Potentially Significant Impact.** As discussed in Section 5, Environmental Analysis, the Proposed Project would have potentially significant impacts related to Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use Planning, Noise, and Transportation. These potentially significant impacts of the Proposed Project would be potentially cumulatively considerable. Generally, contributions to air quality and greenhouse gas emissions impacts are cumulative due to the regional and global nature of air pollution and climate change, respectively.

As described in Sections 5.3, Air Quality, and 5.8, Greenhouse Gas Emissions, the Proposed Project would have potentially significant impacts related to these issue areas. Additional analysis is required to determine whether these impacts would be cumulatively considerable. Therefore, cumulative impacts will be addressed further in the EIR.

**c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?**

**Potentially Significant Impact.** As discussed in Section 5.21(b), the Proposed Project may have potentially significant impacts related to Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use Planning, Noise, and Transportation. Additional analysis is required to determine whether the Proposed Project's environmental effects would cause substantial adverse effects on human beings. Therefore, these issue areas will be addressed further in the EIR.

## **6.0 PREPARERS AND CONTRIBUTORS**

Per State CEQA Guidelines Section 15063(d)(6), this Initial Study was prepared by LAHD with assistance by Aspen Environmental Group. Members of the professional staff are listed below.

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# Appendix A

## 2022 LADOT TAG Plan Consistency Worksheet



## Attachment D: Plan, Policy, and Program Consistency Worksheet

### Plans, Policies and Programs Consistency Worksheet

The worksheet provides a structured approach to evaluate the threshold T-1 question below, that asks whether a project conflicts with a program, plan, ordinance or policy addressing the circulation system. The intention of the worksheet is to streamline the project review by highlighting the most relevant plans, policies and programs when assessing potential impacts to the City's circulation system.

**Threshold T-1:** Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities?

This worksheet does not include an exhaustive list of City policies, and does not include community plans, specific plans, or any area-specific regulatory overlays. The Department of City Planning project planner will need to be consulted to determine if the project would obstruct the City from carrying out a policy or program in a community plan, specific plan, streetscape plan, or regulatory overlay that was adopted to support multimodal transportation options or public safety. LADOT staff should be consulted if a project would lead to a conflict with a mobility investment in the Public Right of Way (PROW) that is currently undergoing planning, design, or delivery. This worksheet must be completed for all projects that meet the Section I. Screening Criteria. For description of the relevant planning documents, **see Attachment D.1.**

For any response to the following questions that checks the box in **bold text** ((i.e.  **Yes** or  **No**), further analysis is needed to demonstrate that the project does not conflict with a plan, policy, or program.

#### I. SCREENING CRITERIA FOR POLICY ANALYSIS

If the answer is 'yes' to any of the following questions, further analysis will be required:

Does the project require a discretionary action that requires the decision maker to find that the project would substantially conform to the purpose, intent and provisions of the General Plan?

Yes  No

Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?

Yes  No

Is the project required to or proposing to make any voluntary modifications to the public right-of-way (i.e., dedications and/or improvements in the right-of-way, reconfigurations of curb line, etc.)?

Yes  No

#### II. PLAN CONSISTENCY ANALYSIS

##### A. Mobility Plan 2035 PROW Classification Standards for Dedications and Improvements

These questions address potential conflict with:



Plan, Policy, and Program Consistency Worksheet

**Mobility Plan 2035 Policy 2.1** – Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.

**Mobility Plan 2035 Policy 2.3** – Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

**Mobility Plan 2035 Policy 3.2** – People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.

**Mobility Plan 2035 Street Designations and Standard Roadway Dimensions**

A.1 Does the project include additions or new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone?  Yes  No

A.2 If **A.1 is yes**, is the project required to make additional dedications or improvements to the Public Right of Way as demonstrated by the street designation.  Yes  No  N/A

A.3 If **A.2 is yes**, is the project making the dedications and improvements as necessary to meet the designated dimensions of the fronting street (Boulevard I, and II, or Avenue I, II, or III)?  Yes  No  N/A

If the answer is to **A.1 or A.2 is NO, or to A.1, A.2 and A.3. is YES**, then the project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions.

A.4 If the answer to **A.3. is NO**, is the project applicant asking to waive from the dedication standards?  Yes  No  N/A

Lists any streets subject to dedications or voluntary dedications and include existing roadway and sidewalk widths, required roadway and sidewalk widths, and proposed roadway and sidewalk width or waivers.

Frontage 1 Existing PROW'/Curb' : Existing \_\_\_\_\_ Required \_\_\_\_\_ Proposed \_\_\_\_\_

Frontage 2 Existing PROW'/Curb' : Existing \_\_\_\_\_ Required \_\_\_\_\_ Proposed \_\_\_\_\_

Frontage 3 Existing PROW'/Curb' : Existing \_\_\_\_\_ Required \_\_\_\_\_ Proposed \_\_\_\_\_

Frontage 4 Existing PROW'/Curb' : Existing \_\_\_\_\_ Required \_\_\_\_\_ Proposed \_\_\_\_\_

If the answer to **A.4 is NO**, the project is inconsistent with Mobility Plan 2035 street designations and must file for a waiver of street dedication and improvement.

If the answer to **A.4 is YES**, additional analysis is necessary to determine if the dedication and/or improvements are necessary to meet the City's mobility needs for the next 20 years. The following factors may contribute to determine if the dedication or improvement is necessary:

Is the project site along any of the following networks identified in the City's Mobility Plan?



## Plan, Policy, and Program Consistency Worksheet

- Transit Enhanced Network
- Bicycle Enhanced Network
- Bicycle Lane Network
- Pedestrian Enhanced District
- Neighborhood Enhanced Network

To see the location of the above networks, see **Transportation Assessment Support Map**.<sup>1</sup>

Is the project within the service area of Metro Bike Share, or is there demonstrated demand for micro-mobility services?

If the project dedications and improvements asking to be waived are necessary to meet the City's mobility needs, the project may be found to conflict with a plan that is adopted to protect the environment.

## B. Mobility Plan 2035 PROW Policy Alignment with Project-Initiated Changes

### B.1 Project-Initiated Changes to the PROW Dimensions

These questions address potential conflict with:

**Mobility Plan 2035 Policy 2.1** – *Adaptive Reuse of Streets. Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.*

**Mobility Plan 2035 Policy 2.3** – *Pedestrian Infrastructure. Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.*

**Mobility Plan 2035 Policy 3.2** – *People with Disabilities. Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.*

**Mobility Plan 2035 Policy 2.10** – *Loading Areas. Facilitate the provision of adequate on and off-site street loading areas.*

### **Mobility Plan 2035 Street Designations and Standard Roadway Dimensions**

B.1 Does the project propose, above and beyond any PROW changes needed to comply with Section 12.37 of the LAMC as discussed in Section II.A, physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property?

Examples of developer-initiated physical changes to the public right-of-way include:

- widening the roadway,
- narrowing the sidewalk,
- adding space for vehicle turn outs or loading areas,
- removing bicycle lanes, bike share stations, or bicycle parking

<sup>1</sup> LADOT Transportation Assessment Support Map <https://arccg.is/fubbd>



Plan, Policy, and Program Consistency Worksheet

- modifying existing bus stop, transit shelter, or other street furniture
- paving, narrowing, shifting or removing an existing parkway or tree well

Yes  No

**B.2 Driveway Access**

These questions address potential conflict with:

***Mobility Plan 2035 Policy 2.10 – Loading Areas.*** Facilitate the provision of adequate on and off-site street loading areas.

***Mobility Plan 2035 Program PL.1. Driveway Access.*** Require driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement.

***Citywide Design Guidelines - Guideline 2:*** Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Site Planning Best Practices:

- Prioritize pedestrian access first and automobile access second. Orient parking and driveways toward the rear or side of buildings and away from the public right-of-way. On corner lots, parking should be oriented as far from the corner as possible.
- Minimize both the number of driveway entrances and overall driveway widths.
- Do not locate drop-off/pick-up areas between principal building entrances and the adjoining sidewalks.
- Orient vehicular access as far from street intersections as possible.
- Place drive-thru elements away from intersections and avoid placing them so that they create a barrier between the sidewalk and building entrance(s).
- Ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by separating loading areas and larger commercial vehicles from areas that are used for public parking and public entrances.

B.2 Does the project add new driveways along a street designated as an Avenue or a Boulevard that conflict with LADOT’s Driveway Design Guidelines (See Sec. 321 in the Manual of Policies and Procedures) by any of the following:

- locating new driveways for residential properties on an Avenue or Boulevard, and access is otherwise possible using an alley or a collector/local street, or
- locating new driveways for industrial or commercial properties on an Avenue or Boulevard and access is possible along a collector/local street, or
- the total number of new driveways exceeds 1 driveway per every 200 feet<sup>2</sup> along on the Avenue or Boulevard frontage, or
- locating new driveways on an Avenue or Boulevard within 150 feet from the intersecting street, or
- locating new driveways on a collector or local street within 75 feet from the intersecting street, or

<sup>2</sup> for a project frontage that exceeds 400 feet along an Avenue or Boulevard, the incremental additional driveway above 2 is more than 1 driveway for every 400 additional feet.



## Plan, Policy, and Program Consistency Worksheet

- locating new driveways near mid-block crosswalks, requiring relocation of the mid-block crosswalk

Yes  No

If the answer to **B.1 and B.2 are both NO**, then the project would not conflict with a plan or policies that govern the PROW as a result of the project-initiated changes to the PROW.

### Impact Analysis

If the answer to either **B.1 or B.2 are YES**, City plans and policies should be reviewed in light of the proposed physical changes to determine if the City would be obstructed from carrying out the plans and policies. The analysis should pay special consideration to substantial changes to the Public Right of Way that may either degrade existing facilities for people walking and bicycling (e.g., removing a bicycle lane), or preclude the City from completing complete street infrastructure as identified in the Mobility Plan 2035, especially if the physical changes are along streets that are on the High Injury Network (HIN). The analysis should also consider if the project is in a Transit Oriented Community (TOC) area, and would degrade or inhibit trips made by biking, walking and/ or transit ridership. The streets that need special consideration are those that are included on the following networks identified in the Mobility Plan 2035, or the HIN:

- Transit Enhanced Network
- Bicycle Enhanced Network
- Bicycle Lane Network
- Pedestrian Enhanced District
- Neighborhood Enhanced Network
- High Injury Network

To see the location of the above networks, see **Transportation Assessment Support Map**.<sup>3</sup>

Once the project is reviewed relevant to plans and policies, and existing facilities that may be impacted by the project, the analysis will need to answer the following two questions in concluding if there is an impact due to plan inconsistency.

B.2.1 Would the physical changes in the public right of way or new driveways that conflict with LADOT's Driveway Design Guidelines degrade the experience of vulnerable roadway users such as modify, remove, or otherwise negatively impact existing bicycle, transit, and/or pedestrian infrastructure?

Yes  No  N/A

B.2.2 Would the physical modifications or new driveways that conflict with LADOT's Driveway Design Guidelines preclude the City from advancing the safety of vulnerable roadway users?

Yes  No  N/A

If either of the answers to either **B.2.1 or B.2.2 are YES**, the project may conflict with the Mobility Plan 2035, and therefore conflict with a plan that is adopted to protect the

<sup>3</sup> LADOT Transportation Assessment Support Map <https://arcg.is/fubbd>



Plan, Policy, and Program Consistency Worksheet

environment. If either of the answers to both **B.2.1. or B.2.2. are NO**, then the project would not be shown to conflict with plans or policies that govern the Public Right-of-Way.

**C. Network Access**

**C. 1 Alley, Street and Stairway Access**

These questions address potential conflict with:

***Mobility Plan Policy 3.9 Increased Network Access: Discourage the vacation of public rights-of-way.***

C.1.1 Does the project propose to vacate or otherwise restrict public access to a street, alley, or public stairway?

Yes  No

C.1.2 If the answer to C.1.1 is Yes, will the project provide or maintain public access to people walking and biking on the street, alley or stairway?

Yes  No  N/A

**C.2 New Cul-de-sacs**

These questions address potential conflict with:

***Mobility Plan 2035 Policy 3.10 Cul-de-sacs: Discourage the use of cul-de-sacs that do not provide access for active transportation options.***

C.2.1 Does the project create a cul-de-sac or is the project located adjacent to an existing cul-de-sac?

Yes  No

C.2.2 If yes, will the cul-de-sac maintain convenient and direct public access to people walking and biking to the adjoining street network?

Yes  No  N/A

If the answers to either C.1.2 or C.2.2 are YES, then the project would not conflict with a plan or policies that ensures access for all modes of travel. If the answer to either **C.1.2 or C.2.2 are NO**, the project may conflict with a plan or policies that governs multimodal access to a property. Further analysis must assess to the degree that pedestrians and bicyclists have sufficient public access to the transportation network.

**D. Parking Supply and Transportation Demand Management**

These questions address potential conflict with:

***Mobility Plan 2035 Policy 3.8 – Bicycle Parking, Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.***

***Mobility Plan 2035 Policy 4.8 – Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.***



## Plan, Policy, and Program Consistency Worksheet

**Mobility Plan 2035 Policy 4.13** – Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.

D.1 Would the project propose a supply of onsite parking that exceeds the baseline amount<sup>4</sup> as required in the Los Angeles Municipal Code or a Specific plan, whichever requirement prevails?

Yes  No

D.2 If the answer to D.1. is YES, would the project propose to actively manage the demand of parking by independently pricing the supply to all users (e.g. parking cash-out), or for residential properties, unbundle the supply from the lease or sale of residential units?

Yes  No  N/A

If the answer to **D.2. is NO** the project may conflict with parking management policies. Further analysis is needed to demonstrate how the supply of parking above city requirements will not result in additional (induced) drive-alone trips as compared to an alternative that provided no more parking than the baseline required by the LAMC or Specific Plan. If there is potential for the supply of parking to result in induced demand for drive-alone trips, the project should further explore transportation demand management (TDM) measures to further off-set the induced demands of driving and vehicle miles travelled (VMT) that may result from higher amounts of on-site parking. The TDM measures should specifically focus on strategies that encourage dynamic and context-sensitive pricing solutions and ensure the parking is efficiently allocated, such as providing real time information. Research has demonstrated that charging a user cost for parking or providing a ‘cash-out’ option in return for not using it is the most effective strategy to reduce the instances of drive-alone trips and increase non-auto mode share to further reduce VMT. To ensure the parking is efficiently managed and reduce the need to build parking for future uses, further strategies should include sharing parking with other properties and/or the general public.

D.3. Would the project provide the minimum on and off-site bicycle parking spaces as required by Section 12.21 A.16 of the LAMC?

Yes  No

D.4. Does the Project include more than 25,000 square feet of gross floor area construction of new non-residential gross floor?

Yes  No

D.5 If the answer to D.4. is YES, does the project comply with the City’s TDM Ordinance in Section 12.26 J of the LAMC?

Yes  No  N/A

If the answer to **D.3. or D.5. is NO** the project conflicts with LAMC code requirements of bicycle parking and TDM measures. If the project includes uses that require bicycle parking (Section 12.21 A.16) or TDM (Section 12.26 J), and the project does not comply with those Sections of the LAMC, further analysis is required to ensure that the project supports the intent of the two LAMC sections. To meet the intent of

<sup>4</sup> The baseline parking is defined here as the default parking requirements in section 12.21 A.4 of the Los Angeles Municipal Code or any applicable Specific Plan, whichever prevails, for each applicable use not taking into consideration other parking incentives to reduce the amount of required parking.



Plan, Policy, and Program Consistency Worksheet

bicycle parking requirements, the analysis should identify how the project commits to providing safe access to those traveling by bicycle and accommodates storing their bicycle in locations that demonstrates priority over vehicle access.

Similarly, to meet the intent of the TDM requirements of Section 12.26 J of the LAMC, the analysis should identify how the project commits to providing effective strategies in either physical facilities or programs that encourage non-drive alone trips to and from the project site and changes in work schedule that move trips out of the peak period or eliminate them altogether (as in the case in telecommuting or compressed work weeks).

**E. Consistency with Regional Plans**

This section addresses potential inconsistencies with greenhouse gas (GHG) reduction targets forecasted in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS).

E.1 Does the Project or Plan apply one the City’s efficiency-based impact thresholds (i.e. VMT per capita, VMT per employee, or VMT per service population) as discussed in **Section 2.2.3** of the TAG?  
 Yes  No

E.2 If the Answer to **E.1 is YES**, does the Project or Plan result in a significant VMT impact?  
 Yes  No  N/A

E.3 If the Answer to **E.1 is NO**, does the Project result in a net increase in VMT?  
 Yes  No  N/A

If the Answer to **E.2 or E.3 is NO**, then the Project or Plan is shown to align with the long-term VMT and GHG reduction goals of SCAG’s RTP/SCS.

E.4 If the Answer to **E.2 or E.3 is YES**, then further evaluation would be necessary to determine whether such a project or land use plan would be shown to be consistent with VMT and GHG reduction goals of the SCAG RTP/SCS. For the purpose of making a finding that a project is consistent with the GHG reduction targets forecasted in the SCAG RTP/SCS, the project analyst should consult **Section 2.2.4** of the Transportation Assessment Guidelines (TAG). **Section 2.2.4** provides the methodology for evaluating a land use project's cumulative impacts to VMT, and the appropriate reliance on SCAG’s most recently adopted RTP/SCS in reaching that conclusion.

The analysis methods therein can further support findings that the project is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy for which the State Air Resources Board, pursuant to Section 65080(b)(2)(H) of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.



## Plan, Policy, and Program Consistency Worksheet

**References**

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LADCP [Citywide Design Guidelines](#).

[https://planning.lacity.org/odocument/f6608be7-d5fe-4187-bea6-20618eec5049/Citywide\\_Design\\_Guidelines.pdf](https://planning.lacity.org/odocument/f6608be7-d5fe-4187-bea6-20618eec5049/Citywide_Design_Guidelines.pdf)

LADOT Transportation Assessment Support Map <https://arcg.is/fubbd>

Mobility Plan 2035

[https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility\\_Plan\\_2035.pdf](https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf)

SCAG. Connect SoCal, 2020-2045 RTP/SCS, <https://www.connectsocial.org/Pages/default.aspx>

auxiliary lane project concepts on the project list. Each project concept will be studied as part of a segment alongside other concepts related to and, in some cases, dependent on the other concept. In addition, these interchange projects are directly related to projects and potential improvements on the intersecting roadways. Many projects on the MSPP list could be connected to the improvements on I-710, including several independent bridge upgrade projects, Complete Street Corridor projects, and transit enhancement projects that cross many interchanges. Additionally, the Investment Plan will invest \$17 million in several non-traditional freeway projects and programs, including studying the concept of adding additional greenspace in the freeway right of way, improving traffic controls at interchanges, and testing methods to reduce the impact of particulate matter emissions from non-tailpipe sources.

The initial investment will conduct an Alternatives Analysis for the 12 interchanges and two auxiliary lane project concepts that will include community engagement, safety and operational assessments, data collection, modeling, and other considerations to allow Metro to identify four to six project concepts, or packages of project concepts, to move into a preliminary engineering and environmental documentation (PA&ED) phase. The selected project concepts will provide the most safety and operational benefits to the mainline freeway and overall transportation system while minimizing the community impacts. After PA&ED, under the condition they meet certain criteria, the projects will move forward into additional phases of implementation. Metro will ensure that freeway projects that move forward for implementation consideration complete the appropriate CEQA/NEPA process.

### 8.6.3.2 Freeway Safety and Interchange Improvements Modal Program

The projects and programs listed in **Table 8-8** are not part of the initial list of projects for initial funding. These projects and programs will be further refined, developed, and/or made ready for implementation through the Freeway Safety and Interchange Improvements Modal Program.

**Table 8-8. Freeway Safety and Interchange Improvements Modal Program**

Project ID	Project Name	Jurisdiction(s)	Tier	Phase
LB-ELA_0153		Multiple Jurisdictions	1	Development
LB-ELA_0046*	I-405 Roadway Improvements Long Beach, Signal Hill, Los Angeles, and Carson (SHOPP)	Multiple Jurisdictions	1	Implementation
LB-ELA_0182	Express Lanes Strategic Initiative	Multiple Jurisdictions	1	Development
LB-ELA_0154		Multiple Jurisdictions	2	Development
LB-ELA_0188	Freeway Landscaping/Maintenance	Study Area Wide	2	Implementation
LB-ELA_0183		Multiple Jurisdictions	2	Development
LB-ELA_0039*	I-710 Highway Worker Safety Improvements Long Beach/Compton	Long Beach/Compton	2	Implementation
LB-ELA_0180	I-710 Truck Bypass Lanes	Long Beach	2	Pre-implementation
LB-ELA_0045*	Route 91 Bridge No. 53-2143F Rehabilitation Long Beach (SHOPP)	Long Beach	2	Implementation

Project ID	Project Name	Jurisdiction(s)	Tier	Phase
LB-ELA_0043*	Hobart Railyard Bridge Rehabilitation Commerce/Vernon	Commerce/Vernon	2	Implementation
LB-ELA_0137	Freeway Soundwalls	Multiple Jurisdictions	2	Implementation
LB-ELA_0155	Drought Tolerant Landscaping, Hardscaping and Aesthetic Features along I-710	Multiple Jurisdictions	2	Implementation
LB-ELA_0050*	Route 91 Upgrades Carson, Compton, Long Beach, and Bellflower (SHOPP)	Multiple Jurisdictions	2	Implementation
LB-ELA_0048*	Garfield Avenue Pump Station Upgrades (SHOPP)	Paramount	2	Pre-implementation
LB-ELA_0052*	Route 47 at I-710 Roadway Upgrades Wilmington (SHOPP)	Wilmington	2	Implementation
LB-ELA_0054*	Humphrey Maintenance Station Upgrades East Los Angeles (SHOPP)	East Los Angeles	2	Implementation
LB-ELA_0053*	Pacific Place Maintenance Station Building Replacement Long Beach (SHOPP)	Long Beach	2	Pre-implementation
LB-ELA_0049*	South Gate Pump Plant and Florence Avenue Pump Plant Upgrades South Gate/ Bell Gardens/Downey (SHOPP)	South Gate/Bell Gardens/Downey	2	Implementation
NA – New	ICM Phase 2: Freeway Corridor Enhancements	Multiple Jurisdictions	NA/New	

Notes:

\*Project is part of Caltrans State Highway Operation and Protection Program (SHOPP)  
Projects deemed to be fully funded were removed from list (see Appendix 8-A)

#### 8.6.4 Goods Movement

The Goods Movement modal category includes projects and programs that impact the trucks and trains moving goods through the LB-ELA Corridor, particularly those accessing or leaving the Port of Los Angeles (POLA) and the Port of Long Beach (POLB). The Investment Plan prioritizes several projects supporting goods movement in alignment with the Investment Plan’s Vision and Goals, including the accelerated adoption of zero-emission (ZE) heavy-duty trucks, ZE truck infrastructure, a freight rail ZE study, and the goods movement freight rail study. Many prioritized goods movement projects identified through this process will be led and advanced by POLA and POLB without direct investment from the Investment Plan due to limitations on using Measure R/M funds. Through this effort and the Investment Plan development process, Metro is committed to supporting our partner agencies to advance projects that support the vision and goals of the LB-ELA Corridor Mobility Investment Plan. Metro must also continue to engage the freight industry as a whole to develop solutions that help facilitate the movement of goods and services in a multimodal manner—while at the same time addressing the air quality, health, and safety issues facing the region and impacting local communities in the LB-ELA Corridor. Goods Movement investment is summarized in **Table 8-9**.

### 8.6.4.1 Goods Movement Project/Programs Recommended for Initial Investment

As described earlier in this chapter, the Investment Plan will invest \$61 million in initial Goods Movement projects. This investment includes the ZET Program, which will invest \$50 million in seed funding to grow the ZE infrastructure investment in the LB-ELA Corridor to more than \$200 million to support the accelerated adoption of ZE technology for heavy-duty trucks. Within the ZE Truck Program, up to \$5 million will be reserved for technical assistance to support a community-focused scope to support the transition to ZE, including workforce development and supporting lower-income truck operators accessing ZE trucks. The Investment Plan will also invest in the study of freight rail in the Corridor to support moving more cargo by train versus truck—particularly through the Alameda Corridor and a pilot study to evaluate the transition of freight locomotives to ZE technology

### 8.6.4.2 Goods Movement Modal Program

The projects and programs listed in **Table 8-10** are not part of the initial recommendations. These projects and programs will be further refined, developed, and made ready for implementation by their respective sponsors, with possible support from Metro.

**Table 8-10. Goods Movement Modal Program**

Project ID	Project Name	Jurisdiction(s)	Tier	Phase
LB-ELA_0024	Pier 400 On Dock Rail Modernization	Port of Los Angeles	1	Pre-implementation
LB-ELA_0026	West Basin Container Terminal Railyard Modernization	Port of Los Angeles	1	Pre-Implementation
LB-ELA_0025	Terminal Island Transfer Facility Modernization	Port of Los Angeles	1	Pre-implementation
LB-ELA_0132b	Pier 300 On-Dock Rail Modernization	Port of Los Angeles	1	Pre-implementation
LB-ELA_0123	Pico Avenue Street Improvement	Port of Long Beach	2	Pre-implementation
LB-ELA_0122	Harbor Scenic Drive Roadway and Infrastructure Improvements	Port of Long Beach	2	Pre-implementation
LB-ELA_0121	Pier D Street Realignment	Port of Long Beach	2	Pre-implementation
LB-ELA_0021	Alameda Corridor Terminus Enhancements	Port of Los Angeles	2	Pre-implementation
LB-ELA_0124	Port of Los Angeles National Multimodal Freight Network Improvement Program: Rail System Improvement Projects	Port of Los Angeles	2	Pre-implementation
NA - New	FRATIS Phase 2	Multiple Jurisdictions	NA/New	
NA - New	Truck Safety and Truck Cut Through Study	Multiple Jurisdictions	NA/New	

Projects deemed to be fully funded were removed from list (see Appendix 8-A)



# Letter from Port of Long Beach Goods Movement Workforce Training Facility



**From:** "Weissman, Sharon L." <[sharon.weissman@polb.com](mailto:sharon.weissman@polb.com)>  
**Date:** March 18, 2024 at 2:55:12 PM PDT  
**To:** Michael Cano <[canom@metro.net](mailto:canom@metro.net)>, Robert Calix <[calstrategicmgt@gmail.com](mailto:calstrategicmgt@gmail.com)>  
**Cc:** "Dau-Ngo, Theresa" <[theresa.dau-ngo@polb.com](mailto:theresa.dau-ngo@polb.com)>, "Espinoza, Shana" <[shana.espinoza@polb.com](mailto:shana.espinoza@polb.com)>  
**Subject:** Draft POLB comments - Draft LB-ELA Corridor Mobility Investment Plan

Hello Michael and Robert,

Here are some of our thoughts at the Port on the Draft Investment Plan sent to us at the end of January.

Will you be highlighting tonight changes, if any, from the plan sent in January?

Thanks,  
Sharon

**DRAFT**  
**Port of Long Beach Comments – March 2024**  
**Draft Long Beach-East Los Angeles Corridor Mobility Investment Plan**

1. **Acknowledgments – Task Force, Freight and Logistics Industry, pg. xii:**
  - a. Revise title for Theresa Dau-Ngo, Director of Port Planning
2. **Table 8-1. Corridor Investments Supported by Other\* Funding Sources, p. 8-3:**
  - a. Revise information on Port of Long Beach projects to remove double-counting of project costs. The Pier B On-Dock Rail Support Facility project costs are included in both the SWIFT program, which received PFIP funding, as well as under the “America’s Green Gateway: Pier B Rail Program Buildout” which received Mega funding. See attached revised table for breakdown of all grants awarded to the various components of the Pier B On-Dock Rail Support Facility project.
3. **Table 8-8. Freeway Safety and Interchange Improvements Modal Program, p. 8-74:**
  - a. The “Congestion Pricing” and “Express Lanes Strategic Initiative” projects should not be listed as Tier 1 for the I-710 freeway.
4. What is the proposed plan for the Task Force following adoption of the LB-ELA Corridor Investment Plan?

5. How will progress/implementation of the proposed projects in the LB-ELA Corridor Investment Plan be monitored? Will there be updates to performance metrics and benefits of the projects?

Thank you,  
Sharon

Mode and Project Name	Estimated Total Cost (\$M)	Committed Amount (\$M)
<b>Goods Movement</b>		
Middle Harbor Terminal Zero Emission Conversion Project	\$30.14	\$37.68
North Harbor Transportation System Improvement Project (Pier B)	\$1,567.00	\$52.63
America's Green Port Gateway Phase 1: Pier B Early Rail Enhancements		\$52.20
America's Green Gateway: Pier B Rail Program Buildout		\$283.00
America's Green Gateway: Pier B Early Rail Enhancements Project		\$70.44
Pier B Street Freight Corridor Reconstruction Project		\$26.30
SWIFT (Pier B Components)		\$158.40
SWIFT (Electrification Projects)	\$593.67	\$224.95
Maritime Support Facility (MSF) Improvement and Expansion Project	\$149.33	\$198.25
Port of Los Angeles Rail Mainline/Wilmington Community and Waterfront Pedestrian Grade Separation Bridge	\$42.08	\$57.91
State Route 47 -Seaside Avenue and Navy Way Interchange Improvement Project	\$41.79	\$62.98
Commerce Rail Flyover	\$12.00	\$939.00
Hobart/Commerce Intermodal Facility	\$15.00	\$1,200.00
<b>Active Transportation</b>		
City of Bell Gardens Pedestrian and Bicycle Improvements	\$2.96	\$2.96

**Funding Source**

U.S. DOT Port Infrastructure Development Program

U.S. Mega Grant

Trade Corridor Enhancement Program (TCEP)

Congestion Mitigation & Air Quality (CMAQ)/Regional Surface Transportation Program (RSTP)

Port Freight and Infrastructure Program (PFIP)

	<b>Costs</b>			
	Component Costs	Share	Program- wide Costs	Total Costs
Shoemaker Bridge Ramps Demolition	39.4	3.1%	8.9	48.3
Locomotive Facility	57.6	4.5%	13.0	70.6
Rail West Expansion	108.4	8.5%	24.4	132.8
Rail East Expansion	69.4	5.4%	15.6	85.0
LA-4 Pump Station	77.1	6.0%	17.4	94.5
Pico Ave. Realignment	96.1	7.5%	21.6	117.7
Pier B Street Widening	42.3	3.3%	9.5	51.8
Dominguez channel Bridge Widening	32.7	2.6%	7.4	40.1
North Yard Utilities & Pier B Street Widening	156.5	12.2%	35.2	191.7
North Yard Rail Expansion	421.4	32.9%	94.8	516.2
South Yard Rail Expansion	178.2	13.9%	40.1	218.3
<b>Component Costs</b>	<b>1279.1</b>	<b>1</b>	<b>287.9</b>	<b>1567.0</b>
Program Wide Costs	287.9			
Total Costs	1567			

## Grant Funding

### CMAQ/RS

TP	PIDP 2021	PIDP 2023	MEGA	PFIP	TCEP
				14.1	
	11.7				33.1
	22.2			83.3	
	18.3				37.3
				61.0	
		14.6			
16.3		4.7			
		33.0			
			201.5		
			81.9		
<b>16.3</b>	<b>52.2</b>	<b>52.3</b>	<b>283.4</b>	<b>158.40</b>	<b>70.4</b>
					633.093

	Funding requested	Share	Funding Awarded
Dominguez Channel Bridge	4.9	8.9%	4.7
North Harbor Utilities	34.7	63.2%	33.0
Pico Avenue	15.3	27.9%	14.6
Total	55.0		52.3
Funding Awarded	52.3		



# Letter from Coalition for Clean Air (CCA)



**Metro**<sup>®</sup>

LONG BEACH - EAST LOS ANGELES CORRIDOR MOBILITY INVESTMENT PLAN

Please find attached our comment letter on the draft LB-ELA Corridor Mobility Investment Plan.

---

Christopher Chavez  
Deputy Policy Director  
Coalition for Clean Air  
[chris@ccair.org](mailto:chris@ccair.org)<mailto:chris@ccair.org>  
(213) 223-6868

Friday, March 15, 2024

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

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

Dear Mr. Cano,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Perhaps unintentionally, the draft Corridor Mobility Investment Plan seems to assume Pacific Harbor Line is part of Union Pacific and/or BNSF. Specifically, Project LB-ELA\_0217: Freight Rail Electrification Pilot Project states:

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Christopher Chavez". The signature is written in black ink and has a fluid, connected style.

Christopher Chavez  
Deputy Policy Director



# Metro Response Letter to Coalition for Clean Air (CCA)



**Metro**<sup>®</sup>

LONG BEACH - EAST LOS ANGELES CORRIDOR MOBILITY INVESTMENT PLAN

**From:** Cano, Michael <[CanoM@metro.net](mailto:CanoM@metro.net)>

**Sent:** Friday, March 15, 2024 5:36 PM

**To:** Chris Chavez <[chris@ccair.org](mailto:chris@ccair.org)>

**Cc:** [710corridor@metro.net](mailto:710corridor@metro.net) <[710corridor@metro.net](mailto:710corridor@metro.net)>; Robert Calix <[calstrategicmgmt@gmail.com](mailto:calstrategicmgmt@gmail.com)>; Joe Lyou <[joe@ccair.org](mailto:joe@ccair.org)>; Laura Herrera <[LHerrera@arellanoassociates.com](mailto:LHerrera@arellanoassociates.com)>; Susan DeSantis <[SDeSantis@ArellanoAssociates.com](mailto:SDeSantis@ArellanoAssociates.com)>; Levinsohn, Dave <[dave.levinsohn@aecom.com](mailto:dave.levinsohn@aecom.com)>; Jonathan Overman <[joverman@camsys.com](mailto:joverman@camsys.com)>; Cylear Dodds, KeAndra <[cyleardoddsk@metro.net](mailto:cyleardoddsk@metro.net)>; Medina, Jessica <[medinaje@metro.net](mailto:medinaje@metro.net)>; Chaves, Ernesto <[chavese@metro.net](mailto:chavese@metro.net)>; Delgadillo, Lucy <[delgadillolu@metro.net](mailto:delgadillolu@metro.net)>; Yamagami, Akiko <[yamagamia@metro.net](mailto:yamagamia@metro.net)>; De Loza-Gutierrez, Lilian <[delozagutierrezl@metro.net](mailto:delozagutierrezl@metro.net)>

**Subject:** Re: Coalition for Clean Air comment letter on LB-ELA Corridor Mobility Investment Plan

Chris:

Thank you for your thoughtful letter — we appreciate it very much! We look forward to discussing it on Monday. I believe the slide deck for Monday is going out, but we will add a slide to discuss these items as part of our presentation.

Thank you, Dr. Lyou, and the team at the Coalition for Clean Air for your leadership and help in pushing Metro to create a new and better way to invest in the I-710/LB-ELA Corridor. We look forward to reviewing the items raised in the letter and finding ways to respond to them as we revise the Draft CMIP for review in April.

If you have any additional questions or want to talk directly, please reach out!

See you Monday,

Michael Cano  
LA Metro  
Executive Officer  
Countywide Planning & Development  
213.418.3010 W  
213.305.0423 C  
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Metro provides excellence in service and support



# Letter from Coalition for Environmental Health and Justice (CEHAJ) and Long Beach Residents Empowered (LiBRE)



**Metro**<sup>®</sup>

LONG BEACH - EAST LOS ANGELES CORRIDOR MOBILITY INVESTMENT PLAN

Hello Metro Staff,

Thank you for the opportunity to provide comments on the Long Beach-East Los Angeles Corridor Mobility Investment Plan (“CMIP”). On behalf of members of the Coalition for Environmental Health and Justice (CEHAJ) and Long Beach Residents Empowered (LiBRE), I share our joint letter outlining our groups’ positions and suggestions on the Draft CMIP.

Thank you for taking our comments into consideration. We look forward to continuing to work together to strengthen the CMIP.

Respectfully,

**Vanessa Rivas Villanueva** (*she/her*)  
Research and Policy Analyst  
California Regional Office  
50 California Street, Suite 500  
San Francisco, CA 94111  
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March 28, 2024

*via electronic mail*

Michael Cano, Executive Officer  
LA Metro  
1 Gateway Plaza  
Los Angeles, CA 90012  
[CanoM@metro.net](mailto:CanoM@metro.net) and [710Corridor@metro.net](mailto:710Corridor@metro.net)

**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."<sup>1</sup>

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."<sup>2</sup> 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."<sup>3</sup> 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.

<sup>1</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 4-3.

<sup>2</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 2-12.

<sup>3</sup> 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.”<sup>4</sup> 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.

<sup>4</sup> 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.<sup>5</sup> Currently, most, if not all, of the communities in the Corridor live in areas with concentrations of PM2.5 above 10 µg/m<sup>3</sup>.<sup>6</sup> 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.<sup>7</sup> 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).

<sup>5</sup> 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>.

<sup>6</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 3-17.

<sup>7</sup> 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).<sup>8</sup> 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.<sup>9</sup> 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

<sup>8</sup> Appendix 6-A Rubrics for Benefit and Concern Criteria.

<sup>9</sup> 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.<sup>10</sup> 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

<sup>10</sup> 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.<sup>11</sup> 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

<sup>11</sup> 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.<sup>12</sup> 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

<sup>12</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 8-46.

Community Program. Currently, the project factsheet lists NA for any potential partners.<sup>13</sup> 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.’<sup>14</sup> 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.<sup>15</sup> However, video surveillance can be ineffective in deterring crime or reducing accidents, often leading to fear and distrust of public agencies and law enforcement.<sup>16</sup> 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.<sup>17</sup> 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,

<sup>13</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 8-47.

<sup>14</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 6-5 and 6-6.

<sup>15</sup> Id.

<sup>16</sup> 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](https://www.researchgate.net/publication/342987504_Crime_and_Fear_in_Public_Places_Towards_Safe_Inclusive_and_Sustainable_Cities).

<sup>17</sup> 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.”<sup>18</sup>

**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.<sup>19</sup> Surveillance of communities, regardless of direct or indirect contact with law enforcement, leads to significant mental and physical health disparities compared to affluent communities.<sup>20</sup> 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.<sup>21</sup> 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.<sup>22</sup> 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.<sup>23</sup>

**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

<sup>18</sup> *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/>.

<sup>19</sup> 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/>.

<sup>20</sup> *Id.*

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

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

<sup>23</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 5-8.

(AI),<sup>24</sup> which some CMIP programs propose to use to alleviate traffic.<sup>25</sup> 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.<sup>26</sup>

## 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.**”<sup>27</sup> 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.<sup>28</sup> These are not the “benefits” the community called

<sup>24</sup> 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>.

<sup>25</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 5-7.

<sup>26</sup> 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/>.

<sup>27</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. xxvi.

<sup>28</sup> 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.”<sup>29</sup> The Corridor communities want improved health and air quality, not more vehicle trips through their neighborhoods.<sup>30</sup> 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.<sup>31</sup> 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.<sup>32</sup> 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.<sup>33</sup> 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).

<sup>29</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 4-9.

<sup>30</sup> 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.

<sup>31</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 4-2.

<sup>32</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 4-9.

<sup>33</sup> 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.<sup>34</sup> 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.<sup>35</sup> 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.<sup>36</sup>

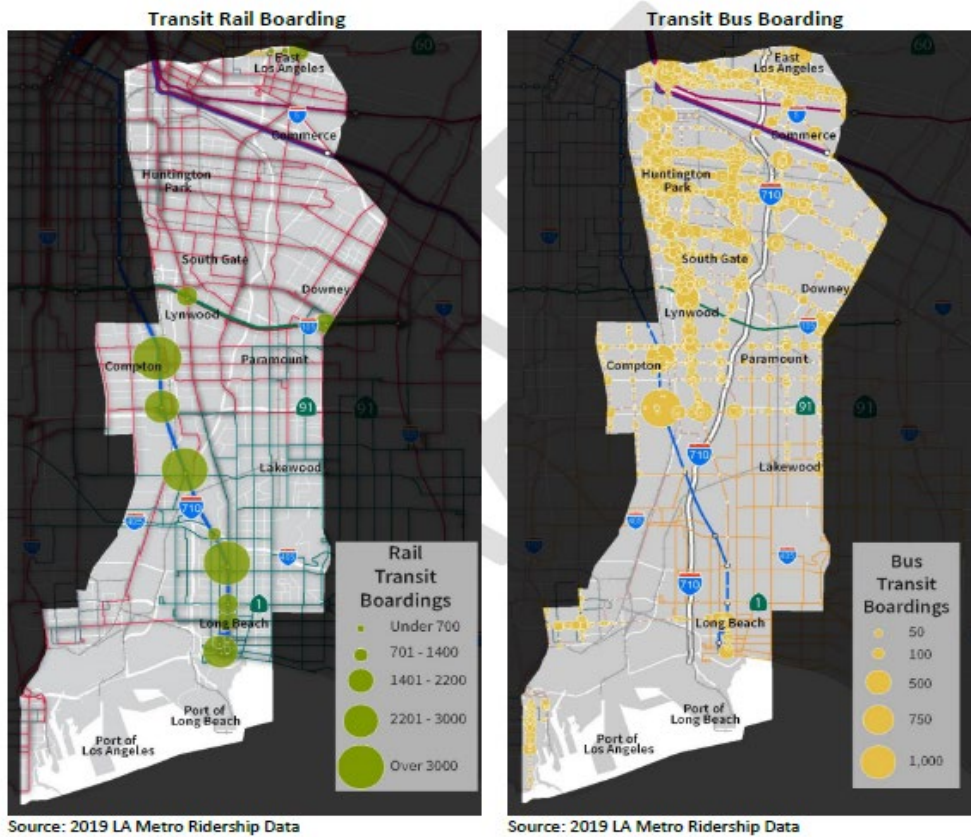
With this renewed opportunity to invest in the Corridor, we call on Metro to prioritize safe, reliable, extensive, and zero-emissions public transit. Our call for a comprehensive and aggressive public transit strategy remains. The Draft CMIP has an opportunity to refocus on Metro’s core commitments to 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.

<sup>34</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 5-2.

<sup>35</sup> Community Alternative 7, p. 3.

<sup>36</sup> *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.<sup>37</sup> 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.<sup>38</sup>

<sup>37</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 8-74.

<sup>38</sup> 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
<b>Total</b>	<b>\$3,205*</b>	<b>\$449</b>	<b>\$294</b>	<b>\$743</b>	<b>\$2,462*</b>

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.<sup>39</sup> 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.

<sup>39</sup> 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.<sup>40</sup> Unfortunately, the equitable

<sup>40</sup> 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.<sup>41</sup> 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.<sup>42</sup> 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.<sup>43</sup> 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.<sup>44</sup> 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.<sup>45</sup> It is discouraging to see programs with similar initiatives not included in the recommended list for initial investment or only partially funded.<sup>46</sup> Metro can and should prioritize programs that reflect community input, especially those addressing equity concerns, safety upgrades, and promoting sustainability.

<sup>41</sup> 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>.

<sup>42</sup> 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>.

<sup>43</sup> LB-ELA Draft Corridor Mobility Investment Plan, p.8-66.

<sup>44</sup> Id.

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

<sup>46</sup> 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].<sup>47</sup> 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.<sup>48</sup> As for flood risks, existing impervious surfaces already prevent rainwater from infiltrating the ground<sup>49</sup> and projects that increase impervious pavements will only worsen storm runoff and flooding.<sup>50</sup> Impervious surfaces collect soot, rubber particles, and dozens of other pollutants, which can significantly impact environmental and human health and communities' mobility.<sup>51</sup> 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.<sup>52</sup> 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.<sup>53</sup> AT programs should not result in the displacement of people as AT programs are fundamentally designed to encourage non-motor

<sup>47</sup> 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.

<sup>48</sup> 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/>.

<sup>49</sup> 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>.

<sup>50</sup> 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/>.

<sup>51</sup> Id.

<sup>52</sup> *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.

<sup>53</sup> 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.<sup>54</sup>

#### **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.”<sup>55</sup> 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.<sup>56</sup> 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.<sup>57</sup> However, Class IV bike lanes not only protect cyclists but are also shown to significantly reduce fatalities for all street users.<sup>58</sup> 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.<sup>59</sup> 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.

<sup>54</sup> 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.

<sup>55</sup> *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.

<sup>56</sup> 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/>.

<sup>57</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. xxii.

<sup>58</sup> 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>.

<sup>59</sup> 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.”<sup>60</sup> 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

<sup>60</sup> 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].<sup>61</sup>

### **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-

<sup>61</sup> 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.<sup>62</sup> 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.<sup>63</sup> 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.<sup>64</sup> 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.”<sup>65</sup> 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

<sup>62</sup> LB-ELA Draft Corridor Mobility Investment Plan, p.2-15.

<sup>63</sup> LB-ELA Draft Corridor Mobility Investment Plan, p.8-40.

<sup>64</sup> LB-ELA Draft Corridor Mobility Investment Plan, p.2-15.

<sup>65</sup> 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<sub>x</sub>), a pollutant known to trigger ozone, which in turn disproportionately impacts health in communities near freight routes, refineries, ports, railyards, and other industrial activities.<sup>66</sup> Among the known health risks of increased exposure to pollution caused by NO<sub>x</sub> 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.<sup>67</sup> Current hydrogen production is almost entirely from fossil fuel-based processes that generate significant NO<sub>x</sub> emissions resulting in nearly 830 million tons of CO<sub>2</sub> per year.<sup>68</sup> 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.<sup>69</sup> Hydrogen leakage is an additional climate risk; hydrogen is an indirect greenhouse gas approximately 12 times more potent<sup>70</sup> 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.<sup>71</sup>

<sup>66</sup> 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>.

<sup>67</sup> 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](https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf).

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

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

<sup>70</sup> 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>.

<sup>71</sup> 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.<sup>72</sup> 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.”<sup>73</sup> 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

<sup>72</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 5-12.

<sup>73</sup> 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.<sup>74</sup> 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.

<sup>74</sup> LB-ELA Draft Corridor Mobility Investment Plan, p. 8-24.

Respectfully,

**The Coalition for Environmental Health and Justice (CEHAJ)**

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**Long Beach Residents Empowered (LiBRE)**



# Metro Response Letter to Coalition for Environmental Health and Justice (CEHAJ) and Long Beach Residents Empowered (LiBRE)



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April 6, 2024

The Coalition for Environmental Health and Justice (CEHAJ)  
and Long Beach Residents Empowered (LiBRE)

**RE: CEHAJ/LiBRE Comment Letter for the Draft LB-ELA Corridor Mobility Investment Plan**

Dear Colleagues:

Thank you all for the comprehensive, thoughtful, and helpful letter sent to us on behalf of the members of CEHAJ and LiBRE on March 28, 2024, as official comment on the Draft Long Beach-East Los Angeles (LB-ELA) Corridor Mobility Investment Plan (CMIP). Thank you also for meeting with our project team on Wednesday, April 4, 2024, to discuss your letter, proposed changes, and outstanding issues to consider as we prepare to bring the revised CMIP back to the Task Force on Monday, April 8, 2024, for discussion and an opportunity to receive a consensus vote of support to bring the CMIP to the Metro Board for consideration this month.

While the process of creating the CMIP started 30 months ago, we recognize that you, your colleagues, and the community have been engaged in the process of determining how to invest in the I-710 Corridor for many years, from the early 2000s when planning and proposals for a project emerged, through the development of the prior I-710 South Corridor Project, to the tremendous cancellation and shift away from that proposal in 2021, to the creation of the LB-ELA CMIP today. You have consistently called for the public to have more than just input, but meaningful participation to help make the CMIP community-centered and beneficial for local residents, not just the region. As members of the Task Force, you have helped shape and guide every step of the process, from creating the Vision, Goals, and Guiding Principles to evaluating the revised Draft CMIP before us today. The equity-focused process of engaging the public, especially through the Community Leadership Committee, has proven essential for not just the process of creating the CMIP, but also the quality of its outcomes. Thank you for your consistent participation in all aspects of the CMIP process, your representation of community, your articulation of key process, policy, and project issues, and your constant effort to improve our planning process and outcomes. We look forward to continuing to work with you through the Working Groups to ensure that the promises and community benefits promised in the CMIP's recommendations that you will consider on Monday come to fruition.

Attached please find two documents: (1) a response to the key comments you raised in your letter, in the form of a comment log, and (2) a copy of the final redlined version of the CMIP that includes all edits made incorporating many items resulting from the letter and our meeting this past week.

On behalf of the Metro team, I hope you find our responses to your letter helpful to clarify and understanding how the CMIP addresses the many issues you raised, including changes made in response to your feedback.

I recall in our first meeting about five years ago when you made it clear that investment in the I-710 Corridor should include no displacement, zero-emission technology, and local/targeted hiring. We are pleased that the CMIP reflects those important goals, and so much more, as we set forth to invest \$743 million in transportation dollars for the Corridor to generate approximately \$4 billion of multimodal investment that is a down payment on addressing many of the needs for better transportation, investment in community programs and benefits, reparative technical assistance, better public health and cleaner air, safer routes for all modes of transportation, zero-emission technology, urban greening and an improved environment, and access to opportunity and shared prosperity.

The CMIP is a strategic, multimodal, transportation vision for the LB-ELA Corridor. Task Force support for the CMIP sets us on a path forward to begin much of the work to develop, define, and deliver the projects and programs recommended for funding through the Working Groups we will initiate following the adoption of the CMIP by the Metro Board. We invite members of the community, the CLC, and your organizations to participate in that process, continue to be our partner in this endeavor, and continue the work of improving the LB-ELA Corridor communities and transportation system in a way that follows the Vision, Goals, and Guiding Principles of the CMIP and provides meaningful benefits to the collective quality of life for residents.

If you have any questions or concerns, please reach out to me at [canom@metro.net](mailto:canom@metro.net).

Sincerely,

*Michael Cano*

Michael Cano  
Executive Officer, Multimodal Integrated Planning  
Countywide Planning and Development

<p><b>Section I</b> - Community input and engagement are essential for meaningful outcomes and Task Force re-engagement is a critical starting point.</p>	<p>CMIP Ch. 9 discusses the potential structure of the Implementation Working Group engagement, which can include Task Force and CLC members, as well as semi-annual reengagement of the Task Force and CLC. These working groups will be very important for Metro to develop and implement projects and programs for the CMIP in alignment with the Vision, Goals, and Guiding Principles. Community participation and engagement is a priority.</p>
<p><b>Section II - Summary of Comments</b>, Recommendations include prioritizing pedestrian and bicycle safety, confirming the absorption of specific bus stop improvement projects, and ensuring a comprehensive definition of zero emissions to eliminate harmful combustion and NOx emissions.</p>	<p>For CMIP Ch. 8 Complete Streets Fact Sheets design guidance text was updated. For bikeways, CMIP Ch. 8 Regionally Significant Bicycle Projects from the Metro Active Transportation Plan Fact Sheet was updated to include text about prioritizing implementation of protected bikeways (Class 1 or Class 4) on these corridors. Metro supports providing safety for bicyclists and removing conflicts with trucks and vehicles, and recognizes the importance of protected bikepath facilities.</p>
<p><b>Section II</b> - CEHAJ opposes projects that may undermine civil liberties or prioritize industry interests over community needs, such as Video Camera installation, Freight Rail Electrification Pilot Project, Congestion Pricing and Express lanes.</p>	<p>Updated CMIP Section 9.3 to demonstrate Metro's commitment to implementation with guidelines related to surveillance. Updated CMIP Ch. 8 Congestion Pricing Fact Sheet and Appendix 6c to show flag and depriorization. Updated CMIP Section 8.6 with the following note above modal program table: <i>It should be noted that some projects, like Congestion Pricing, have garnered significant community opposition. Projects listed as Tier 1 will not necessarily move forward in the future.</i></p>

<p><b>Section III - Prioritize Public Health and Eliminate Projects that May Cause More Harm Than Good.</b> The Draft CMIP lacks specificity regarding the health, air quality, and climate implications of proposed projects, raising concerns about its ability to prioritize community well-being. 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. Recent EPA changes to air quality standards underscore the need for more stringent strategies to improve air quality, especially in areas like the Corridor with high levels of pollution.</p>	<p>It is not feasible to evaluate air quality or health impacts at the project level as part of the Investment Plan, which is a strategic planning document. Metro does not have the level of detail required to perform the analysis at this stage; projects will undergo and need to meet CEQA/NEPA requirements as they move towards implementation. CMIP Section 8.5 clarifies how social determinants of health inform the current recommendations and how community programs will continue to advance health equity. CMIP Section 9.3 clarifies that all projects will be screened to determine whether an Air Quality analysis would be required as part of the CEQA/NEPA process. As part of the CEQA/NEPA process, a project's potential health risk impacts would also be evaluated during construction and operation, which may include a quantitative Health Risk Assessment, depending on a project's location, construction duration, construction activities, potential sources of emissions and proximity to receptors.</p>
<p><b>Section III - Prioritize Public Health and Eliminate Projects that May Cause More Harm Than Good.</b> 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)</p>	<p>See the methodology rubric for why those projects have "NA" for emissions benefits and impacts - they were not modeled.</p>

<p><b>Section III - Prioritize Public Health and Eliminate Projects that May Cause More Harm Than Good.</b> The lives of workers and residents in the Corridor should be prioritized, and projects likely to cause public health harm should be omitted from the CMIP.</p>	<p>Projects will continue to undergo assessment for negative impacts per CEQA/NEPA, and may be removed if found to have significant impact. Updated CMIP Section 9.3 to clarify that future projects will require a CEQA/NEPA clearance.</p> <p>Updated CMIP Ch. 8, MOSAIC Fact Sheet to read:  <i>This study will provide the more refined assessment needed to determine which of these projects are the <b>most beneficial, without significant impacts</b>, and should move to the next phase of their development.</i></p>
<p><b>Section IV - Metro Should Prioritize Community Benefits.</b> There is a glaring lack of emphasis on community benefits. Community Programs should not be bundled and used for mitigation for harmful projects.</p>	<p>Updated CMIP Section 8.5 to clarify that Community Programs are not intended to be mitigations for harmful projects, and added additional information to describe intent of Community Programs to address equity issues in the corridor. The Equity Planning and Evaluation Tool (EPET), included in Appendix 4-A, also address the Investment Plan's emphasis on community benefits.</p>
<p><b>Section IV - Metro Should Prioritize Community Benefits.</b> There are concerns about the disproportionate allocation of funding within the Draft CMIP, with a significant portion directed towards modal programs rather than community-led initiatives. This raises questions about the plan's commitment to equity and community well-being.</p>	<p>Measure R and M funding for investment in Community Programs is limited by the transportation nexus requirement, which is why Metro is investing \$40 million in a Community Programs Catalyst Fund to support the creation of successful Community Programs that will have access to other sources of funding more aligned with or eligible for the projects and programs to be developed by the Community Programs Working Groups. Recognizing the need for commitment to this outcome, Metro has set a target of \$300M in funding from outside grant sources as a means of signalling to partners that our expectation is that these programs yield revenue, projects and programs, and benefits for community. It will be the Working Group's task to clarify the potential for investment to meet this target—and hopefully exceed it—in the implementation phase of the CMIP. Community members will be able to participate in and help design the programs. Updated Section 8.5 to include target.</p>
<p><b>Section IV - Metro Should Prioritize Community Benefits.</b> There is a critical need to prioritize green spaces in the CMIP; Green spaces 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.</p>	<p>Updated CMIP Ch. 8 Urban Greening Fact Sheet project description to underscore importance of greening and potential benefits. Added project guideline to Section 9.3 to emphasize need for permeable cover.</p>

<p><b>Section IV - Metro Should Prioritize Community Benefits.</b> California is in the midst of an unprecedented housing crisis, Metro and County can play a role in stabilizing housing. Anti-displacement measures are needed to stabilize housing for low-income residents, as well as programs to prevent evictions, preserve affordable housing, and develop sustainable housing options.</p>	<p>Updated CMIP Ch. 8 Housing Stabilization Community Program Fact Sheet to underscore importance of housing stabilization program.</p>
<p><b>Section IV - Metro Should Prioritize Community Benefits.</b> Re: Economic stabilization programs and local hire commitments, they should stand alone as independent projects that merit initial investment and ongoing support to ensure their implementation, not just in the planning phase.</p>	<p>Updated CMIP Section 8.5 to clarify that Community Programs are not intended to be mitigations for harmful projects, and added additional information to describe intent of Community Programs to address equity issues in the corridor.</p>
<p><b>Section IV - Metro Should Prioritize Community Benefits.</b> Programs to improve air quality and mitigate pollution are critical but should not serve as mitigation for other harmful projects. Suggestions for expanding air quality monitoring stations and implementing measures to improve indoor air quality.</p>	<p>Updated CMIP Ch. 8 Air Quality and Community Health Program Fact Sheets to underscore important of these programs and add to list of potential project/program types based on CEHAJ suggestions.</p>
<p><b>Section IV - Metro Should Prioritize Community Benefits.</b> The section supports zero-emission solutions and bus electrification but urges community involvement in project development. It emphasizes the importance of partnerships with community organizations and residents.</p>	<p>Updated CMIP Ch. 8 Fact Sheets for ZE Infrastructure for Autos and Bus Electrification Projects. Metro will engage in community-centered decision-making through the Community Programs Working Groups with impacted communities. Metro and the Working Groups may also consider community education on hydrogen fuel and related issues with regional and community partners.</p>
<p><b>Section IV - Metro Should Prioritize Community Benefits.</b> There's strong opposition to projects involving increased policing and surveillance, citing concerns about privacy, civil rights, and the disproportionate impact on marginalized communities. Funding for community programs should be prioritized over surveillance technologies.</p>	<p>No projects in the initial investments include cameras. Modal programs will go through additional screening to review equity and CIC flags that indicate community concerns. Projects found to have significant negative impact through working group assessment will not move forward. Updated project list (Appendix 6c) with flags on projects with camera equipment.</p>

<p><b>Section IV - Metro Should Prioritize Community Benefits,</b> Community groups argue that freeway projects should not receive equity points as they primarily prioritize efficiency in moving goods through impacted communities rather than addressing past harms, providing fair access to opportunities, or eliminating disparities.</p> <p>The focus of freeway projects should be on rectifying past prioritization of industry over community health and livelihoods, with an emphasis on improving health and air quality rather than increasing vehicle traffic.</p>	<p>Equity is defined in the evaluation criteria as 'benefits or burdens place on disadvantaged communities'. If a freeway project provided safety benefits for instance in an EFC, Equity points would be allocated.</p> <p>Added the parenthical note to the CMIP Ch. 8 MOSAIC Fact Sheet under CIC flags:</p> <p>CIC Flags: Congestion Pricing (LB-ELA_0153) and ExpressLanes Strategic Initiative (LB-ELA_0182)</p> <p>General: Concerns about potential displacements (LB-ELA_0093 and LB-ELA_0091 specifically, and others generally).</p>
<p><b>Section V - Freeway and Arterial Projects Should Serve Impacted Communities and Deliver Benefits.</b> Community support exists for arterial roadway projects, but with a caveat that they must adhere to Clean Air Act conformity analysis requirements.</p>	<p>Updated CMIP Ch. 8 to state all applicable projects will adhere to Clean Air Act conformity analysis</p>
<p><b>Section VI - Transit Projects.</b> The section emphasizes the importance of prioritizing community health, environmental protection, and traffic safety in transit planning. Highlights the need for a <b>comprehensive public transit strategy focused on rail and bus improvements rather than solely maximizing existing infrastructure.</b></p>	<p>Raised funding for LB-ELA Corridor Bus Transit Priority Program from \$3M to \$31 to more comprehensively address transit needs.</p>
<p><b>Section VI - Transit Projects.</b> Various transit improvement projects are discussed, including enhancing bus stop infrastructure, improving transit service times, and prioritizing transit safety over surveillance and policing measures. Recommendations include adding amenities like shade and seating to bus shelters and installing safety gates at rail crossings.</p>	<p>Updated CMIP Ch. 8 Bus Stop Improvement Fact Sheet with additional detail and clarified the leveraging. Surveillance guidance was added to Section 9.3.</p>

<p><b>Section VII - Active Transportation.</b> Emphasis is placed on the need for AT programs to prioritize safety enhancements such as high visibility intersections, traffic calming features, and accessible infrastructure. Projects like Safe Routes for Seniors and Students and Pedestrian/Bicycle Enhancements and Safety Features are cited as examples. It is discouraging to see programs with similar initiatives not included in the recommended list for initial investment or only partially funded. Metro can and should prioritize programs that reflect community input, especially those addressing equity concerns, safety upgrades, and promoting sustainability.</p>	<p>Initial Investment funding raised from \$33M to \$44M. in CMIP Ch. 8 modal programs were updated - the Development of AT programs will occur through the Working Group for AT/Transit/ARCS projects, and will center communities in the AT Planning process.</p>
<p><b>Section VII - Active Transportation.</b> While AT programs offer health and equitable benefits, there's recognition that some projects can have negative impacts, such as increased impervious cover leading to urban heat islands and flood risks. The section advocates for projects that minimize these impacts and address environmental justice concerns.</p>	<p>Added more detail to CMIP regarding impervious cover to community program implementation in Ch. 9. and included explicit language to incorporate urban greening in AT projects.</p>
<p><b>Section VIII - Zero Emissions and Public Safety Strategies Without Displacement.</b> Request to prioritize zero-emissions projects that directly benefit impacted communities and provide co-benefits such as local job opportunities. The section advocates for a transparent allocation of funds that prioritizes projects addressing equity concerns and delivering measurable benefits to Corridor communities.</p>	<p>Metro's commitment to equity will guide zero-emission investments for the \$5 million dollars set aside for small fleet owners.</p>

**Section VIII - Zero Emissions and Public Safety Strategies**

**Without Displacement.** The section urges Metro to prioritize direct electrification over hydrogen technology, citing safety risks, air pollution concerns, and inefficiencies associated with hydrogen. It calls for a clear focus on projects that advance direct electrification solutions, emphasizing their safety, efficiency, and lower environmental impact.

Added to fact sheets and ZET section of CMIP:

Metro is committed to exploring all viable zero-emission technologies, including battery-electric and hydrogen, to meet regulatory mandates and sustainability goals without endorsing one solution. Metro is also committed to investing its CMIP funds in a manner that aligns with and advances the LB-ELA Corridor Task Force Vision, Goals, and Guiding Principles.

- Addressing Community Concerns: Recognizes concerns regarding public health, emissions during hydrogen production, transportation safety, and potential leakage, affirming Metro's dedication to minimizing impacts and educating communities.
- Compliance with Clean Fleets Rule: California's 2035 Zero-Emission (ZE) drayage truck mandate focused on tailpipe emissions, highlighting the need for comprehensive approaches to achieve ZE outcomes.
- State and Federal Investments: Significant investments in hydrogen and battery-electric technologies, including up to \$1.2 billion Regional Clean Hydrogen Hub (H2Hubs) award, indicating strong governmental support for diverse ZE solutions.
- Community Advocacy and Education: Metro aims to serve as a community advocate in ZE Truck (ZET) technology policy discussions, ensuring community concerns are addressed, supporting research, and facilitating educational initiatives on ZE technologies.
- Expert Panel Discussions and Symposia: Plans to organize expert panels, symposia, and community education events to deepen understanding of hydrogen technology, its state of development, and its implications for the LB-ELA Corridor.
- Collaborative Efforts for ZE Future: Continue collaboration with stakeholders to develop a ZE future that benefits the LB-ELA Corridor, emphasizing the importance of community input and guidance in educational and policy

**Section VIII - Zero Emissions and Public Safety Strategies Without Displacement.**

There's a concern about potential efforts to weaken environmental regulations such as the California Environmental Quality Act (CEQA) for zero-emissions infrastructure projects. The section advocates for maintaining robust environmental protections and public transparency in project review and permitting processes, emphasizing the importance of community engagement and scrutiny.

Metro understands the concerns raised by CEHAJ and LiBRE that, in the desire to expedite the delivery of needed ZE infrastructure to support the transition of heavy-duty trucks from diesel to ZE technology, we do not also create new disparities caused by the reduction in environmental protections, public transparency, or community engagement. Metro is supportive of all parties involved with the planning and delivery of ZE Infrastructure to continue to work together to ensure this community concern is not overlooked. Metro's Working Groups, which will oversee the development of ZE technology investments, will include community members and advocates who will help provide accountability on this matter. Updated Fact

Sheet:

Environmental Review and Permit Streamlining Concerns: Metro supports robust public review and vetting for all projects, including those projects labeled zero-emission. Metro will engage in community-centered decision-making through the Working Groups with impacted communities and should avoid endorsements of potentially harmful applications without community input. Metro and the Working Groups may also choose to conduct community education on hydrogen fuel and related issues with regional and community partners.

**Section VIII - Zero Emissions and Public Safety Strategies**

**Without Displacement.** The section emphasizes the long-standing demand for zero-emission solutions in the LB-ELA Corridor and calls for Metro to prioritize such solutions over partial measures like "near zero" technology. It supports the inclusion of Clean Truck Infrastructure and Zero-Emissions Truck Programs in the CMIP but urges a focus on community health and well-being in their deployment.

Metro is committed to exploring all viable zero-emission technologies, including battery-electric and hydrogen, to meet regulatory mandates and sustainability goals without endorsing one solution. Metro is also committed to investing its CMIP funds in a manner that aligns with and advances the LB-ELA Corridor Task Force Vision, Goals, and Guiding Principles. Community benefits and impacts—including health—will be a key component of planning studies, project development, and implementation regarding ZE infrastructure.

- Addressing Community Concerns: Recognizes concerns regarding public health, emissions during hydrogen production, transportation safety, and potential leakage, affirming Metro's dedication to minimizing impacts and educating communities.
- Compliance with Clean Fleets Rule: California's 2035 Zero-Emission (ZE) drayage truck mandate focused on tailpipe emissions, highlighting the need for comprehensive approaches to achieve ZE outcomes.
- State and Federal Investments: Significant investments in hydrogen and battery-electric technologies, including up to \$1.2 billion Regional Clean Hydrogen Hub (H2Hubs) award, indicating strong governmental support for diverse ZE solutions.
- Community Advocacy and Education: Metro aims to serve as a community advocate in ZE Truck (ZET) technology policy discussions, ensuring community concerns are addressed, supporting research, and facilitating educational initiatives on ZE technologies.
- Expert Panel Discussions and Symposia: Plans to organize expert panels, symposia, and community education events to deepen understanding of hydrogen technology, its state of development, and its implications for the LB-ELA Corridor.
- Collaborative Efforts for ZE Future: Continue collaboration with stakeholders to develop a ZE future that benefits the LB-ELA Corridor, emphasizing the

**Section VIII - Zero Emissions and Public Safety Strategies**

**Without Displacement.** Strong emphasis is placed on robust community engagement in planning and implementing zero-emissions infrastructure projects. The section advocates for meaningful community involvement to ensure that projects align with community needs, address concerns, and provide tangible benefits.

Updated Ch. 9 to demonstrate Metro's commitment to implementation including goals for zero displacements.

Metro is committed to exploring all viable zero-emission technologies, including battery-electric and hydrogen, to meet regulatory mandates and sustainability goals without endorsing one solution. Metro is also committed to investing its CMIP funds in a manner that aligns with and advances the LB-ELA Corridor Task Force Vision, Goals, and Guiding Principles.

- Addressing Community Concerns: Recognizes concerns regarding public health, emissions during hydrogen production, transportation safety, and potential leakage, affirming Metro's dedication to minimizing impacts and educating communities.
- Compliance with Clean Fleets Rule: California's 2035 Zero-Emission (ZE) drayage truck mandate focused on tailpipe emissions, highlighting the need for comprehensive approaches to achieve ZE outcomes.
- State and Federal Investments: Significant investments in hydrogen and battery-electric technologies, including up to \$1.2 billion Regional Clean Hydrogen Hub (H2Hubs) award, indicating strong governmental support for diverse ZE solutions.
- Community Advocacy and Education: Metro aims to serve as a community advocate in ZE Truck (ZET) technology policy discussions, ensuring community concerns are addressed, supporting research, and facilitating educational initiatives on ZE technologies.
- Expert Panel Discussions and Symposia: Plans to organize expert panels, symposia, and community education events to deepen understanding of hydrogen technology, its state of development, and its implications for the LB-ELA Corridor.
- Collaborative Efforts for ZE Future: Continue collaboration with stakeholders to develop a ZE future that benefits the LB-ELA Corridor, emphasizing the

**Section IX - Goods Movement.** The section outlines the goal of optimizing goods movement in the LB-ELA Corridor while reducing air quality and health impacts on communities. It highlights four recommended projects for initial investment: Zero-Emission Truck Program, Clean Truck Infrastructure, Goods Movement Freight Rail Study, and Freight Rail Electrification Pilot Project.

Updated CMIP Ch. 8 Goods Movement Freight Rail Study Fact Sheet with text about the study of the impacts of freight paths.

**Section IX - Goods Movement.** There is a concern that the selected rail projects primarily address industry needs without adequately benefiting impacted communities. Specifically, the Freight Rail Study is criticized for potentially neglecting future negative impacts on communities, such as increased impervious surface and congestion, while focusing only on potential benefits for industry stakeholders.

Metro's goal with the Freight Rail Electification study is to make the Alameda Corridor a ZE corridor in support of our shared goal to make the LB-ELA Corridor a ZE Corridor of the future. The community will receive benefits from an Alameda Corridor that carries ZE locomotive technology to move more cargo through the trench between the Ports and the Intermodal Railyards. The goal with this public funding is not to subsidize private industry or supplant private/other funding for the testing of ZE locomotives outright, but to work with all relevant partners, including the community, to determine how to convert the Alameda Corridor to ZE technology so that the movement of cargo from the docks at the southern end of the LB-ELA Corridor to the intermodal railyards at the northern end of the LB-ELA Corridor will feature ZE technology and support advancements at the Ports and at the Railyards to convert to ZE technology. The Freight Rail Electrification study will be developed with community participation in the Working Groups and will feature these community concerns as part of its scope of work. It is important to note that Metro is a member of the Alameda Corridor Transportation Authority and is advancing these goals at the policy level at that agency. The Goods Movement Freight Rail Study is intended to develop, with community and partner stakeholders, the strategies, policies, and levers needed to move more of the cargo in the LB-ELA Corridor by train instead of truck. The Alameda Corridor is currently underutilized with approximately only 30% of its capacity in use today. The concerns identified by community stakeholders in this letter and those raised during the development of the study in the Working Group, which will include community participation, will be included in the scope of work to ensure this concern is addressed. As the CMIP has a longer-term horizon than the immediate near-term, funding can be allocated for these purposes.

Rewrote the project factsheet [LB-ELA\_0217] slightly: *Work with the Alameda Corridor Transportation Authority (ACTA) along with the railroads (Union Pacific (UP) and Burlington Northern Santa Fe (BNSF)) to continue to develop and test*

<p><b>Section IX. Goods Movement.</b> Preference for Electrification of Underutilized Infrastructure: Instead of funding private projects, CEHAJ advocates for prioritizing electrification of the Alameda Corridor, which is seen as underutilized. The section argues that such investments would provide more immediate and tangible benefits to communities compared to funding industry-led pilot projects.</p>	<p>Prioritization for ZE technology will be electrification, with an assessment of other technologies including potential community impacts and benefits as requested. The funding sources listed as alternate funding sources are meant to leverage the \$10 million allocation. Any funding that is not ultimately used for this effort will return to the Goods Movement modal program.</p> <p>Freight/goods movement projects included in the Investment Plan are those that minimize negative environmental impacts, modernize technology, and upgrade infrastructure.</p> <p>The List of Projects Recommended for Initial Investment includes ZE truck infrastructure and a study of freight rail electrification projects/programs.</p>
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# Letter from The U.S. Environmental Protection Agency (EPA)



Michael and Corridor Team,  
Please see EPA comments on the LB-ELA 710 Corridor Investment Plan.  
Thank you for the opportunity to provide feedback,  
Connell

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Connell Dunning  
Environmental Review Section (National Environmental Policy Act Reviews)  
Environmental Justice, Community Engagement, and Environmental Review Division  
U.S. EPA Region 9, Pacific Southwest  
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415.947.4161

*EPA has developed an environmental justice mapping and screening tool called EJScreen. It is based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. Learn more at <https://www.epa.gov/ejscreen>*



## REGION 9

SAN FRANCISCO, CA 94105

March 29, 2024

Michael Cano, Executive Officer  
Countywide Planning and Development  
LA Metro  
One Gateway Plaza, MS 99-13-1  
Los Angeles, California 90012

Subject: US EPA Comments on the Long Beach-East Los Angeles Corridor Mobility Investment Plan

Dear Michael Cano:

The U.S. Environmental Protection Agency has reviewed the Long Beach-East Los Angeles Corridor Mobility Investment Plan (CMIP), an effort established following the halt of the continued consideration of Alternative 5C that was a part of the Draft Environmental Impact Statement analysis for the 710 South Expansion. EPA understands that although the Final EIS for the 710 Corridor has not yet been publicly released, Caltrans and Metro have stated a commitment to no longer pursue capacity enhancement/expansion along the mainline of the 710 Corridor.

The EPA appreciates participating as an Ex Officio member in the CMIP Task Force, and values that the Metro Board established the process “must include a renewed commitment to inclusive and meaningful engagement of communities as well as a steadfast commitment to addressing the equity, displacement, air quality, congestion and economic concerns that have plagued communities around major freeway corridors (CMIP, p. 1-2) EPA appreciates the time, patience, energy, and resources Metro has offered over the last two years to promote an accessible and inclusive, interactive process, including offering evening meetings in multiple languages.

While the CMIP was not prepared to comply with the National Environmental Policy or Clean Air Act regulations, the EPA has acted as an Ex Officio Member to provide early feedback to Metro and Caltrans regarding important considerations, as early in the process as possible, for improving public health and the environment with an eye toward a future need to comply with national policy and air regulation.

### ***EPA Review Summary***

The EPA commends Metro for establishing a Task Force process that has included priorities for equity considerations and community engagement. We also appreciate the multiple commitments for pollution reduction, emerging technologies, reducing particulate matter emissions, increasing active

transportation, transit, and community programs. EPA’s feedback at this conclusion of the development of the Investment Strategy consists of recommended considerations related to NEPA and Clean Air Act transportation conformity as projects within the Investment Strategy are advanced for analysis.

### **12 Interchange Projects, 2 Auxiliary Lane projects**

- **Commitment to meet conformity requirements:** EPA appreciates the stated commitment in Section 8.6.3.1 (p. 8-74) that, “Metro will ensure that freeway projects that move forward for implementation consideration complete the appropriate CEQA/NEPA.” EPA recommends that Metro also directly state in the CMIS that, “Metro will ensure that freeway projects that move forward for implementation consideration complete the appropriate project level transportation conformity requirements.”
- **Confirm Alternatives Analysis structure/scope:** Metro is proposing an intermediary, planning level process, an Alternatives Analysis, that will occur prior to CEQA/NEPA analysis,

*“Bundle all the proposed Investment Plan freeway infrastructure projects into one set of candidate projects for an Alternatives Analysis/Prioritization study. This is necessary because the Investment Plan evaluation of design concepts is not detailed enough to prioritize the freeway infrastructure projects. Assess the 12 Investment Plan interchange project concepts and two auxiliary lane projects in more detail to ascertain which ones should advance to preliminary engineering and environmental analysis and in what order. This will include an update of the multimodal benefits of each project including improvement of freeway mainline safety and operations based on updated traffic data, and refined design concepts, and reassessment of key impacts, particularly displacements and air quality conformity. It will include a robust public and community involvement and engagement process.*

*Also assess the independent utility and logical termini of each proposed project, which may lead to packaging some projects into one combined project—for example, packaging the proposed auxiliary lane between the Del Amo Boulevard and Long Beach Boulevard interchanges with the redesign of those interchanges. Another multimodal packaging opportunity is to incorporate active transportation elements into the design of the arterial overcrossings to improve AT mobility and reconnect communities on either side of I-710. These elements are included in the Caltrans complete streets policy.” (p. 8-28)*

We appreciate that next steps will address displacements and air quality conformity. Consistent with the project’s environmental justice and equity objectives, EPA continues to strongly recommend avoiding displacements and consideration of all measures to reduce adverse air quality impacts to the maximum extent practicable. Given recent history and prior challenges regarding transportation conformity along the 710 Corridor, the EPA requests that the CMIP include a commitment for Metro and Caltrans to meet with EPA before the proposed Alternatives Analysis process is initiated. EPA requests an opportunity to provide feedback to

Metro and Caltrans regarding the intended Alternative Analysis design and process, data sources, methodology, and analysis to insure that the conclusions can inform future NEPA and project level conformity analyses without needing to be revisited pursuant to statutory requirements.

- **Process suggestion for how Alternatives Analysis will inform future NEPA/CAA conformity analysis:** In order for the data, analysis, and conclusions from the “Alternatives Analysis” process to adequately reflect cumulative impacts to communities adversely affected by the I-710 corridor and be used for informing future decisionmaking pursuant to NEPA, EPA recommends that Caltrans consider pursuing analysis of the 12 highway projects and 2 Auxiliary Lanes on I-710 (and the associated connected Active Transportation projects) through one combined programmatic environmental analysis, or through a formal Planning and Environmental Linkages (PEL) process. Caltrans has completed a Planning and Environmental Linkages Handbook that provides additional information about this approach,<sup>1</sup> which is designed to formally document planning level analyses so that information and conclusions derived from such processes can be incorporated by reference (and not have to be revisited) for later NEPA analyses.
- **Update the reason why US EPA determined a hot spot analysis would be required for prior I-710 Expansion alternative:** Page 1-6, states, “2020 - The United States Environmental Protection Agency (EPA) determined that a hotspot analysis would be required for the LPA (Alternative 5C) due to their concerns regarding the air quality conformity of the project.” Please revise this to state, “2020 - The United States Environmental Protection Agency (EPA) reiterated through a letter to Caltrans and Metro that a hotspot analysis would be required for the LPA (Alternative 5C) due to the project resulting in increased truck-related diesel emissions and resulting potential challenges meeting air quality standards.”
- **Update Timeline to reflect Caltrans/Metro choosing to halt analysis of Alternative 5C:** On Page 1-6, in the timeline, it appears that a milestone is missing from the timeline. Directly following the EPA letter from 2020, the next item states, “2021 - In July, in response to Metro’s action, the....”, yet there is no bullet point stating Metro’s action. Please add a Milestone stating that Caltrans/Metro paused the EIS process. A summary of the milestone is included later in the document on Page 1-9 (Section 2): “In May 2021, the Metro Board suspended the environmental review of the I-710 South Corridor Project’s Locally Preferred Alternative (LPA) 5C (herein referred to as Alternative 5C) due to significant concerns that the proposed project would not meet air quality conformity standards; would create untenable displacement in disadvantaged communities adjacent to the freeway; and would contradict updated local, state, and federal policies related to freeway widening or expansion projects.”
- **Provide Status of the Final EIR/EIS for 710 South Expansion:** On Page 1-6, a bullet point states, “The Metro Board acted on a request from Caltrans to rescind the LPA (Alternative 5C) and, in its place, approve Alternative 1, the “No Build” alternative, as the new LPA for the I-710 South

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<sup>11</sup> Caltrans Planning and Environmental Linkages Handbook, <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/ser/ct-pel-guidebook-all.pdf>

*Corridor Project Final Environmental Document (Legistar File #2022-0100). This request was based on a state policy change intended to align transportation investments with improvement in climate change effects. This action effectively concluded the prior environmental process.* Please revise the last sentence, here, and throughout the document where applicable, to reflect the current status of the pending Final EIR/EIS and Record of Decision, which we understand is still in preparation and will, when published, be the conclusion of the prior environmental review process. Per National Environmental Policy Act procedure, the environmental review process is still ongoing and there has been no published documentation of Caltrans/Metro rescinding the Draft EIS or choosing the No Action Alternative.

- **Clarify, with a description, in the CMIP what the separate “qualifying I-710 CMCP” is:** Section 1.4, Page 1-8 states, *“Through the development and approval of the LB-ELA CMIP. Metro is also preparing a qualifying I-710 CMCP to compete for and secure a portion of the \$250 million in state funding made available through the Senate Bill 15 Solutions for Congested Corridors Program. This critical funding supports Metro’s ability to deliver Measures R and M.”* EPA is not aware of a separate, additional ongoing I-710 CMCP and requests clarity regarding what a separate I-710 CMCP consists of and how it compares to, or will inform, the Alternatives Analysis of the 12 Interchanges and 2 Auxiliary Lanes.
- **Prioritize Community Programs in the Initial Investment:** Projects proposed for the Initial Investment are listed in Table 8-2 (p. 8-9) and appear to be focused on Active Transportation, Arterial Roadways/Complete Streets, Freeway Safety and Interchange Improvements, Goods Movement Projects, and Transit Projects. Community Programs are referenced in Section 8.5, but it’s unclear whether these programs would be included in the Initial Investment. EPA recommends that Metro clarify whether Community Programs would be included in the Initial Investment. Given the existing disparities faced by communities along the I-710 corridor, EPA recommends that Metro prioritize Community Programs for implementation.
- **Comprehensive analysis of zero tailpipe emission technologies:** EPA recommends that Metro pursue a robust analysis of potential zero tailpipe emission technologies and associated infrastructure contemplated in the Draft CMIP, including upstream and downstream impacts. We recommend considering technologies that are least impactful and most protective of communities affected by the I-710 corridor.
- **Include robust and meaningful community engagement throughout the process.** EPA recommends that Metro incorporate meaningful community engagement and commitments to environmental justice and equity throughout all phases of the Corridor Investment Plan process, including through NEPA/CEQA reviews, through evaluation of available technologies, and as other next steps/Working Groups are rolled out.

The EPA appreciates the opportunity to review the Long Beach-East Los Angeles Corridor Mobility Investment Plan and we are interested in continuing to participate in continued working group discussions regarding projects in the corridor, measure to reduce particulate matter, and efforts to integrate emerging technologies and reduce greenhouse gas emissions. If you have any questions,

please contact me at donez.francisco@epa.gov, or Connell Dunning, the EPA Region 9 NEPA Transportation Team Lead, at (415) 947-4161 or dunning.connell@epa.gov.

Sincerely,

**FRANCISCO  
DONEZ**

Digitally signed by  
FRANCISCO DONEZ  
Date: 2024.03.29 10:14:09  
-07'00'

Francisco Dóñez  
Acting Manager  
Environmental Review Section 2

cc: Kelly Ewing-Toledo  
Deputy District Director, Division of Environmental Planning, Caltrans District 7



# Metro Response Letter to The U.S. Environmental Protection Agency (EPA)



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

April 7, 2024

Francisco Dóñez  
Acting Manager  
Environmental Review Section 2  
United States Environmental Protection Agency, Region 9

**RE: US EPA Comments on the Long Beach-East Los Angeles Corridor Mobility Investment Plan**

Dear Mr. Dóñez:

Thank you for your letter on behalf of the U.S. Environmental Protection Agency (EPA) relaying your comments regarding the Draft Long Beach-East Los Angeles (LB-ELA) Corridor Mobility Investment Plan (CMIP).

We appreciate EPA's participation as an ex-officio member of the LB-ELA Corridor Task Force. You have helped us develop a CMIP that will lead to better air quality, an improved environment, and community-focused benefits for residents in the LB-ELA Corridor. We appreciate your support in helping us look ahead to future compliance with National Environmental Policy Act (NEPA) and Clean Air Act (CAA) conformity for the CMIP's projects.

Developing the Alternatives Analysis and Meeting Future NEPA/ CAA Conformity Analysis:

The I-710 Multimodal, Operational, Safety, and Access Investments for the Community (MOSAIC) Program comprises 12 interchange projects and two auxiliary lane projects that will undergo evaluation and community engagement before priorities are identified for environmental review and ultimately implementation. **This program is a central feature of the CMIP and, in contrast to the Alternative 5C project, features no widening of the freeway, no new general-purpose travel lanes, and no displacement of residents in the LB-ELA Corridor.**

Developing the I-710 MOSAIC Program will require great coordination among Metro, Caltrans, EPA, local communities, corridor users, and other stakeholders, particularly in prioritizing projects that provide benefits and that will meet future NEPA/CAA conformity analysis. The first step of this process will be to initiate the Alternatives Analysis/Prioritization study. **Metro agrees with EPA's request for the CMIP to include a commitment for Metro and Caltrans to meet with EPA before the proposed Alternatives Analysis process is initiated.** This commitment will be reflected in the Final CMIP sent to the Metro Board for consideration.

At this pre-Alternatives Analysis meeting, **Metro and Caltrans will also discuss with EPA the opportunity to employ the formal Planning and Environmental Linkages (PEL) process.**

Requests for Updated CMIP Language: Your letter contained several requests for corrections related to the reason why USEPA determined a hot spot analysis would be required for the prior I-710 Alternative 5C project, the timeline, and the status of the pending Final EIR/EIS and Record of Decision for Alternative 5C. **Metro will make those corrections to the Final CMIP.**

I-710 CMCP: The California Transportation Commission (CTC) administers the Solutions for Congested Corridors Program (SCCP), a discretionary grant program which funds projects contained within a qualifying Comprehensive Multimodal Corridor Plan (CMCP). The LB-ELA CMIP will also qualify as a CMCP for the I-710 Corridor, satisfying CTC guidelines. By qualifying the CMIP as an I-710 CMCP, Metro will be able to secure funding for CMIP projects in future SCCP grant cycles. **Language clarifying this process and intent has been added to the Final CMIP.**

Community Programs:

**The projects and programs proposed for Initial Investment include the Community Programs Catalyst Fund.** The CMIP recommends allocating a front-loaded \$40 million that prioritizes setting up the fund and beginning the work of launching each of the 15 Community Programs through three Working Groups following the approval of the CMIP by the Metro Board. Additionally, Metro intends to leverage this \$40 million fund to realize a target of \$300 million, or an average of \$20 million per Community Program, as a demonstration of commitment and expectation that these programs will yield significant investment in the LB-ELA Corridor communities. **Metro intends to make clear in the Final CMIP that the Community Programs are indeed part of the Initial Investment and are priorities for CMIP implementation.**

Comprehensive Analysis of ZE tailpipe technologies:

Metro recognizes that the implementation of ZE tailpipe technologies will require comprehensive analysis and understanding of what potential impacts are to local communities that may occur in the effort to meet ZE mandates, particularly in the freight sector. **Metro has committed to convening expertise on and hosting symposia and community educational meetings to discuss ZE technologies, in particular hydrogen,** which is less mature for freight vehicle purposes than battery electric technology.

Robust and Meaningful Community Engagement

Metro is committed to ensuring the implementation of the CMIP, including its Working Groups that will be responsible for developing recommended projects and programs, will follow the Vision, Goals, and Guiding Principles of the CMIP. **Metro intends to continue exercising the Guiding Principle of Equity as the CMIP progresses, which includes including robust community engagement and inviting community members and advocates to participate in the development and implementation of the many priorities contained in the CMIP.**

Thank you for all your detailed and helpful comments. Hopefully, these responses will help clarify Metro's intention for and commitment to the various items you raised. We look forward to

working with you as we implement the CMIP to invest in the projects and programs that will bring benefits to the local communities, particularly for better air quality, public health, and environment.

If you have any questions or concerns, please reach out to me at [canom@metro.net](mailto:canom@metro.net).

With great appreciation,

*Michael Cano*

Michael Cano  
Executive Officer, Multimodal Integrated Planning  
Countywide Planning and Development

cc: Kelly Ewing-Toledo – Deputy District Director, Division of Environmental Planning, Caltrans District 7



# Letter from Los Angeles County Business Federation (BizFed)



From: **Chris Wilson** <[chris.wilson@bizfed.org](mailto:chris.wilson@bizfed.org)>  
Date: Mon, Apr 1, 2024 at 4:12 PM  
Subject: BizFed Comments - Metro Mobility Investment Plan  
To: Cano, Michael <[canom@metro.net](mailto:canom@metro.net)>, <[710corridor@metro.net](mailto:710corridor@metro.net)>  
Cc: Robert Calix <[calstrategicmgmt@gmail.com](mailto:calstrategicmgmt@gmail.com)>

Good afternoon Michael and all,

Attached is a comment letter regarding the released draft of the Mobility Investment Plan.

If you have any questions, please don't hesitate to contact me.



**Chris Wilson**, Senior Advocacy Manager  
(562) 201-6034 - [chris.wilson@bizfed.org](mailto:chris.wilson@bizfed.org)

**Los Angeles County Business Federation**

*Strengthening the voice of business since 2008 by uniting 235 diverse business groups mobilizing 420,000 employers with 5 million employees*

[CLICK TO RSVP](#): Celebrate extraordinary business leadership at the Bizzi Awards Ceremony on 3/22

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; H<sub>2</sub>-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



# Metro Response Letter to Los Angeles County Business Federation (BizFed)





**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
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April 7, 2024

Fran Inman  
Chair  
Los Angeles County Business Federation  
6055 E. Washington Blvd. #1005  
Commerce, CA 90040

Dear Chair Inman,

Thank you for your letter providing comment on the Draft Long Beach-East Los Angeles (LB-ELA) Corridor Mobility Investment Plan (CMIP). Even more importantly, thank you for your participation and leadership on the Task Force, helping us collectively find a path forward to investment in the LB-ELA/I-710 Corridor after the prior project failed to advance. The Los Angeles County Business Federation (BizFed) has been a steady partner for Metro in many endeavors, including this 31-month process to bring a comprehensive, multimodal, community-centered, and regionally significant CMIP forward to the Metro Board. We recognize and appreciate BizFed's support for the LB-ELA Corridor, particularly its central role in driving the regional economy by facilitating the safe, efficient movement of goods in a way that also reduces impacts to local communities in the Corridor and regional air quality.

The following are response to your comments provided in the letter:

**Lomita Blvd./SR-47 Connector Project:** Thank you for your support for this new project. This project is now added to the CMIP Modal Program for Arterial Roadways/Complete Streets and will be eligible for support for future grant funding.

**Goods Movement Rail Study:** The Metro Board has approved \$50 million for the Zero Emission Truck program that is part of the CMIP and included in its recommendations. This is the program that we believe is responsive to your request as it is focused on our efforts to meet our climate goals, deliver \$200 million in ZE infrastructure to support the deployment of ZE Heavy Duty trucks, and coordinate with the California Transportation Commission's SB 671 program. We appreciate our partnership with BizFed and others in the area on helping the CTC identify I-710 as a critical part of and priority for the SB 671 program, in particular.

As part of the overall strategy to reduce the number of heavy-duty trucks using the congested I-710 Freeway, Metro seeks to better utilize the Alameda Corridor to move more cargo through the LB-ELA Corridor. The Alameda Corridor is currently underutilized, operating at approximately 30%, due to policy, incentive, and other issues that make it at times more appealing to move cargo by truck that could otherwise be moved by train, despite the externalities to the LB-ELA Corridor communities, air quality, traffic congestion, and safety.

The Goods Movement Rail Study is intended to allow Metro, as a member of the Alameda Corridor Transportation Authority, to work with our partners at the Ports, our Class I freight rail partners, the trucking industry, and the community to identify the policies, fiscal levers and incentives, strategy, advocacy, and implementation plan needed to better utilize the Alameda Corridor as part of the multimodal approach to moving goods and improving our economy while reducing community impacts in the LB-ELA Corridor.

This study is paired with a Freight Rail Electrification Pilot program that will focus on helping our partners transition the Alameda Corridor—and the movement of cargo by rail between the Ports and the downtown Intermodal rail yards—into a ZE Corridor. While Metro is prioritizing the study of electrification for the Corridor, we also understand that the technology that will ultimately be used to make the Alameda Corridor ZE in the future is not yet determined. The study will support Metro’s efforts to identify, understand, evaluate, and develop this technology as part of the planning work to be conducted upon approval of the CMIP.

The reason for the Alameda Corridor being identified in the CMIP as a target for ZE-conversion study and funding is due to the LB-ELA Corridor’s focus on infrastructure within its boundaries and the impacts associated with moving freight on the local communities. Metro as an agency seeks to partner also with the many stakeholders involved with the more regional approach to moving freight with ZE technology beyond the LB-ELA borders and beyond the limits of the CMIP.

**Congestion Pricing and ZET Requirements:** We agree that these proposals are not priorities for the CMIP, and they will be moved to the Modal Programs for future evaluation, with no commitment of funding or prioritization for development attached to them. BizFed’s concerns, along with similar concerns raised by other partners, will be attached to these items if they are ever to be evaluated in the future.

It is important to note that Metro does not have any official policy or planning priorities to look at congestion pricing on I-710. Neither our Traffic Reduction Study nor our ExpressLanes Strategic Plan identify I-710 as corridor for study or implementation.

**Interchange Improvements:** Thank you for your support for our I-710 Multimodal, Operational, Safety, and Access Investments for the Community (MOSAIC) program that seeks to improve the interchanges that connect our LB-ELA Corridor communities, businesses, and logistics facilities to I-710. Despite the limited funding available from Measures R and M in the CMIP, we are hopeful that this Investment Plan can set up a pipeline of projects to receive future state and federal funding to improve every interchange in the corridor in a manner that reflects the need to preserve our communities, improve mobility for all, and facilitate the safer movement of people and goods through the Corridor. BizFed’s support for this program will be noted in the CMIP record.

We appreciate your comments and look forward to receiving your support for the CMIP at the April 8, 2024, LB-ELA Corridor Task Force meeting. We will bring the CMIP to the Metro Board for consideration in the following weeks and look forward to continuing our partnership with BizFed to deliver on the many projects, programs, priorities, and promises recommended by the LB-ELA CMIP.

Please feel free to reach out to me ([canom@metro.net](mailto:canom@metro.net)) if you have any questions or comment.

With great appreciation,



Michael Cano  
Executive Officer, Multimodal Integrated Planning  
Countywide Planning and Development

C: Chris Wilson, Senior Policy Manager