STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, Division of Environmental Planning
100 South Main Street, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0703
FAX (213) 897-0685
TTY (213) 897-4937

Flex your power!
Be Energy efficient!

PROJECT EA # 249900

July 8, 2010

United States Environmental Protection Agency
Tom Plenys
Environmental Review Office, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: I-710 Corridor Project Environmental Impact Report/Environmental Impact Statement Purpose and Need, Alternatives, and Explanation of Technical Study Methodologies

Dear Mr. Plenys:

Pursuant to our continuing coordination under Section 6002 of SAFETEA-LU, we are writing to bring you up to date on the I-710 Corridor Project, including the Purpose and Need, project alternatives, and study methodologies, as well as the formal initiation of the NEPA/404 Memorandum of Understanding (MOU).

Purpose and Need
Caltrans, in cooperation with Los Angeles County Metropolitan Transportation Authority (Metro) and our funding partners, developed the Purpose and Need Statement for the Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the I-710 Corridor Project in Los Angeles County, California. This draft Purpose and Need Statement was sent to Cooperating and Participating Agencies on August 18, 2009 and input on this statement was received from the Environmental Protection Agency, United States Army Corps of Engineers, and the Los Angeles County Department of Water and Power. Please see Attachment A for the response to comments received on the draft as well as the final Purpose and Need Statement for the I-710 Corridor Project. Refinements were made to the Purpose and Need Statement and processed for consideration through the corridor neighborhood-based Community Participation Framework (see Attachment B).

Alternatives
In August 2008, a formal public scoping process was initiated for the I-710 Corridor Project. As part of scoping, six preliminary alternatives were presented to the public for consideration with various levels of investment, ranging from a No Build Alternative to the Locally Preferred Strategy (LPS) adopted in the previous I-710 Major Corridor Study (MCS). Following the close of public comment for the scoping process, an alternatives screening analysis was conducted to determine whether any alternatives should be modified or withdrawn from further consideration. Comments and suggestions from participating and cooperating agencies on the alternatives were seriously evaluated as a part of this process. In this screening phase, a conceptual level of analysis was performed on the initial set of six alternatives to provide comparative information on their relative benefits, costs, and impacts. The measures used to distinguish the differences among these alternatives addressed areas such as improvements to traffic mobility, traffic safety, air quality, and health effects; impacts to environmental resources; and right-of-way impacts. This screening analysis is available at www.metro.net/projects/i710_corridor, under "Documents and Reports."

Based on the screening analysis and on guidance received from the advisory committees involved in the local community participation process, a recommendation was developed that identified certain alternatives (and key

features or components) to be carried forward in the technical studies for the EIR/EIS. Descriptions of the alternatives considered in the I-710 Corridor Project alternatives screening analysis and recommended for evaluation in this EIR/EIS are as follows:

- **No Build Alternative:** The No Build Alternative would maintain the current configuration of the existing I-710 Corridor. There would be no capacity-increasing improvements to the I-710 mainline; only approved and planned projects included in SCAG's 2008 RTP and 2008 RTIP are considered part of the No Build Alternative. The No Build Alternative provides a baseline for comparing the impacts associated with the build alternatives.
- **Alternative 5A: I-710 Widening and Modernization:** Alternative 5A proposes to widen the I-710 mainline to up to ten GP lanes (five lanes on I-710 northbound [NB] and five lanes on I-710 southbound [SB]). This alternative will modernize the design of the Interstate 405 (I-405) and State Route 91 (SR-91) interchanges with I-710, reconfigure local arterial interchanges throughout the corridor, modify freeway access at various locations, and shift the I-710 centerline at various locations to reduce right-of-way impacts. In addition to improvements on the I-710 mainline and on the interchanges, Alternative 5A also includes some TSM/TDM, transit, and ITS improvements.
- **Alternative 6A: I-710 Widening plus Freight Corridor (Trucks):** Alternative 6A includes all the components of Alternative 5A as described above. In addition, this alternative includes a separated four-lane freight corridor to be used by conventional trucks. It should be noted that trucks using this freight corridor are expected to be newer (post-2007) projected diesel/fossil-fueled trucks (new or retrofitted engines required per new regulations and standards) that will generate lower emissions than the trucks using the I-710 Corridor today. The freight corridor would be mostly on an elevated structure with two lanes in each direction between Ocean Blvd. and the intermodal railyards in the cities of Vernon and Commerce. There would be a limited number of dedicated entry and exit points within the project limits.
- **Alternative 6B: I-710 Widening plus Freight Corridor (Zero-Emission Vehicles):** Alternative 6B includes all the components of Alternative 6A described above but would restrict the use of the freight corridor to zero-emission trucks rather than conventionally powered trucks. This proposed technology would include, but not be limited to: battery-powered trucks as well as trucks powered by an electric distribution system, linear-induction-motor or linear-synchronous-motor systems (or other concepts), or future zero-emission technologies to be designed as part of the freight corridor. The design of the freight corridor will also assume possible future conversion, or initial construction, as feasible (which may require additional environmental analysis and approval), of a fixed-track guideway family of alternative technologies.

Technical Study Methodologies

In 2009, the I-710 Corridor Project technical team initiated preparation of draft technical studies. For most of these studies, the methodology was defined using Caltrans' Standard Environmental Reference (SER). These methodologies can be found online at http://www.dot.ca.gov/ser/matrix/matrix.htm. However, methodologies customized to the I-710 Corridor Project were used for the Air Quality/Health Risk Assessment as well as the Environmental Justice analysis. Please see Attachment C for these specific methodologies. In addition to the above-mentioned methodologies specific to the I-710 Corridor Project, the I-710 technical studies and the EIR/EIS will also include a focused discussion of public health considerations. As part of the community outreach process for the project, the I-710 Corridor Advisory Committee received a presentation from a broad coalition of public health advocates, which recommended that a comprehensive Health Impact Assessment (HIA) be prepared for the project. Based upon a review of previous research by air quality experts and academic specialists, Caltrans does not agree that a stand-alone HIA is necessary. Many HIA components are beyond the scope of a transportation improvement project. However, we do believe that a focused discussion of relevant health issues is appropriate given the high level of public health concerns in the I-710 Corridor. To that end, the project studies and the Draft EIR/EIS will include a focused assessment of public health considerations. Caltrans will continue to monitor any scientifically relevant developments in this important area.

We would appreciate your comments on the selected alternatives as well as the methodologies to be used in preparation of the I-710 Corridor Project technical studies. Please provide your written comments to Caltrans, c/o Garrett Damrath, MS 16A, 100 South Main Street, Suite 100, Los Angeles, CA 90012 prior to August 12, 2010 (30 days). We look forward to your response. In addition, we have attached a copy of the updated Project Coordination Plan (Attachment D) for your information. If you have any questions or would like to discuss the project or our agencies' respective roles and responsibilities during the preparation of this EIR/EIS in more detail, please contact Garrett Damrath at (213) 897-9016.

Sincerely,

Ron Kosinski
Deputy District Director

Enclosures: Attachment A - Final Purpose and Need Statement and Draft Purpose and Need Statement Response to Comments Matrix
Attachment B - Community Participation Framework
Attachment C - AQ/HRA and Environmental Justice methodologies
Attachment D - Project Coordination Plan

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, Division of Environmental Planning
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Flex your power!
Be Energy efficient!

PROJECT EA # 249900

July 8, 2010

Phuong Trinh
Regulatory Project Manager
United States Army Corps of Engineers
PO Box 532711
Los Angeles, CA 90053-2325

Re: I-710 Corridor Project Environmental Impact Report/Environmental Impact Statement Purpose and Need, Alternatives, and Explanation of Technical Study Methodologies, and NEPA/404 Memorandum of Understanding

Dear Ms. Trinh:

Pursuant to our continuing coordination under Section 6002 of SAFETEA-LU, we are writing to bring you up to date on the I-710 Corridor Project, including the Purpose and Need, project alternatives, and study methodologies, as well as the formal initiation of the NEPA/404 Memorandum of Understanding (MOU).

Purpose and Need
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Alternatives
In August 2008, a formal public scoping process was initiated for the I-710 Corridor Project. As part of scoping, six preliminary alternatives were presented to the public for consideration with various levels of investment, ranging from a No Build Alternative to the Locally Preferred Strategy (LPS) adopted in the previous I-710 Major Corridor Study (MCS). Following the close of public comment for the scoping process, an alternatives screening analysis was conducted to determine whether any alternatives should be modified or withdrawn from further consideration. Comments and suggestions from participating and cooperating agencies on the alternatives were seriously evaluated as a part of this process. In this screening phase, a conceptual level of analysis was performed on the initial set of six alternatives to provide comparative information on their relative benefits, costs, and impacts. The measures used to distinguish the differences among these alternatives addressed areas such as improvements to traffic mobility, traffic safety, air quality, and health effects; impacts to environmental resources; and right-of-way impacts. This screening analysis is available at www.metro.net/projects/i710_corridor, under "Documents and Reports."

Based on the screening analysis and on guidance received from the advisory committees involved in the local community participation process, a recommendation was developed that identified certain alternatives (and key features or components) to be carried forward in the technical studies for the EIR/EIS. Descriptions of the alternatives considered in the I-710 Corridor Project alternatives screening analysis and recommended for evaluation in this EIR/EIS are as follows:

- **No Build Alternative:** The No Build Alternative would maintain the current configuration of the existing I-710 Corridor. There would be no capacity-increasing improvements to the I-710 mainline; only approved and planned projects included in SCAG's 2008 RTP and 2008 RTIP are considered part of the No Build Alternative. The No Build Alternative provides a baseline for comparing the impacts associated with the build alternatives.
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Technical Study Methodologies

In 2009, the I-710 Corridor Project technical team initiated preparation of draft technical studies. For most of these studies, the methodology was defined using Caltrans' Standard Environmental Reference (SER). These methodologies can be found online at http://www.dot.ca.gov/ser/matrix/matrix.htm. However, methodologies customized to the I-710 Corridor Project were used for the Air Quality/Health Risk Assessment as well as the Environmental Justice analysis. Please see Attachment C for these specific methodologies. In addition to the above-mentioned methodologies specific to the I-710 Corridor Project, the I-710 technical studies and the EIR/EIS will also include a focused discussion of public health considerations. As part of the community outreach process for the project, the I-710 Corridor Advisory Committee received a presentation from a broad coalition of public health advocates, which recommended that a comprehensive Health Impact Assessment (HIA) be prepared for the project. Based upon a review of previous research by air quality experts and academic specialists, Caltrans does not agree that a stand-alone HIA is necessary. Many HIA components are beyond the scope of a transportation improvement project. However, we do believe that a focused discussion of relevant health issues is appropriate given the high level of public health concerns in the I-710 Corridor. To that end, the

project studies and the Draft EIR/EIS will include a focused assessment of public health considerations. Caltrans will continue to monitor any scientifically relevant developments in this important area.

NEPA/404 MOU

This letter also serves to integrate the NEPA/404 process into the coordination with your agency that is already underway. Due to the potential impacts of the proposed freight movement lanes included in Alternatives 6A and 6B on the Los Angeles River, coordination has taken place with ACOE Engineering. In order to properly and formally begin the NEPA/404 process, we would like to request a meeting with you.

We would appreciate your comments on the selected alternatives as well as the methodologies to be used in preparation of the I-710 Corridor Project technical studies. Please provide your written comments to Caltrans, c/o Garrett Damrath, MS 16A, 100 South Main Street, Suite 100, Los Angeles, CA 90012 prior to August 12, 2010 (30 days). We look forward to your response. In addition, we have attached a copy of the updated Project Coordination Plan (Attachment D) for your information. If you have any questions or would like to discuss the project or our agencies' respective roles and responsibilities during the preparation of this EIR/EIS in more detail, please contact Garrett Damrath at (213) 897-9016.

Sincerely,

Ron Kosinski
Deputy District Director

Enclosures: Attachment A - Final Purpose and Need Statement and Draft Purpose and Need Statement Response to Comments Matrix
Attachment B - Community Participation Framework
Attachment C - AQ/HRA and Environmental Justice methodologies
Attachment D - Project Coordination Plan

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

STEPHEN R. MAGUIN
Chief Engineer and General Manager

August 4, 2010

File No: 01-00.04-00
02-00.04-00
03-00.04-00
08-00.04-00

Mr. Garrett Damrath
Department of Transportation
MS 16 A
100 South Main Street, Suite 100
Los Angeles, CA 90012-3606

Dear Mr. Damrath:

Interstate 710 Corridor Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report/ Environmental Impact Statement Purpose and Need, Alternatives, and Explanation of Technical Study Methodologies (DEIR/EIS) for the subject project on July 13, 2010. The proposed development is located within the jurisdictional boundaries of Districts Nos. 1, 2, 3, and 8. We offer the following comments on the DEIR/EIS:

COVER LETTER
Alternatives

- Previous comments submitted by the Districts in correspondence dated September 2, 2008 (copy enclosed), to your agency, still apply to the subject project.

- Alternatives 5A, 6A, and 6B – The Districts own, operate, and maintain the Long Beach Main Pumping Plant (LBMPP) located west of and adjacent to the I-710, between 16th Street and Gaylord Street. The LBMPP is crucial in the conveyance of wastewater from the cities of Long Beach, Signal Hill, Lakewood and portions of Artesia, Cerritos, and Hawaiian Gardens. Design is underway for the replacement and expansion of this facility, which must stay in operation during construction. Acquisition of adjacent properties is in progress.

SAFETEA-LU 6002 COORDINATION PLAN
Section 1

- On page 1, second entry from bottom of table and on page 3, 7th entry in table, correct Los Angeles County Sanitation Districts' name. Delete the word "Department" and add "Districts'" in its place.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

c: M. Tremblay
J. Fong

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
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www.lacsd.org

STEPHEN R. MAGUIN
Chief Engineer and General Manager

September 2, 2008

File No: 01-00.04-00
02-00.04-00
03-00.04-00
08-00.04-00

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans District 7
100 South Main Street, MS 16-A
Los Angeles, CA 90012

Dear Mr. Kosinski:

Interstate 710 Corridor Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on August 18, 2008. The proposed project is located within the jurisdictional boundaries of Districts Nos. 1, 2, 3, and 8. We offer the following comments:

1. The proposed project may impact existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specifications that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Ms. Martha Tremblay of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

E-Signed by Ruth I. Frazen
RIF: authenticity with Approve

Ruth I. Frazen
Customer Service Specialist
Facilities Planning Department

RIF:rf
c: M. Tremblay

Doc #: 1095818.1

Recycled Paper

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

GAIL FARBER, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

August 10, 2010

IN REPLY PLEASE
REFER TO FILE: PD-9

Mr. Ron Kosinski, Deputy District Director RK
Department of Transportation
100 South Main Street, Suite 100
Los Angeles, CA 90012-3606

Dear Mr. Kosinski:

INTERSTATE 710 CORRIDOR PROJECT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT PURPOSE AND NEED, ALTERNATIVES, AND TECHNICAL STUDIES METHODOLOGIES

We have reviewed the July 8, 2010, draft report prepared by URS Corporation entitled "EIR/EIS Purpose and Need, Alternatives, and Technical Studies Methodologies" and have the following comments:

Project Purpose

The Department of Public Works believes that decades of growth in international commerce and containerization of goods through the ports of Long Beach and Los Angeles have added strain on the Interstate 710 (I-710) infrastructure resulting in lower Levels of Service (LOS), increase in airborne toxins, and increase in truck-related accidents on the freeway. Public Works is also cognizant that continued growth in population and economic activities in Southern California will add further strain to the aging infrastructure and could have a direct impact on public health.

Therefore, Public Works concurs with the stated project purpose as:

- Improve air quality and public health
- Improve traffic safety
- Address design deficiencies
- Address projected traffic volumes
- Address projected growth in population, employment, and economic activities related to goods movement

Project Need

Public Works is concerned that the LOS along several segments of the I-710 freeway, particularly at the north end, are currently operating at LOS of E and F. We are also concerned with the state of the I-5/I-710 interchange, the current deficiencies of the connectors, and the resulting weaving of traffic flows. In addition, traffic volumes along several connecting arterials such as Olympic Boulevard, Del Amo Boulevard, Florence Avenue, and others within the County of Los Angeles' unincorporated communities that are utilized for goods movements are currently strained and may be further impacted due to the project and expected growth in truck traffic. These issues will need to be addressed to ensure that the quality of life in the East Los Angeles and Rancho Dominguez communities is preserved.

Therefore Public Works concurs with the draft project need as:

- Increase capacity to meet transportation demand and safety
- Address roadway deficiencies
- Modal interrelationships and system linkages
- Air quality improvements

Alternatives

As you know, Public Works is actively participating on the Technical Advisory and the Project Committees of the I-710 Project and has been involved in the discussion and development of the alternatives. The County will continue to evaluate the proposed alternatives for suitability, economic feasibility, soundness of engineering solutions, and impacts to our environment and public health. While we believe that all of the "build" alternatives will provide a certain level of congestion relief and would enhance goods movement in the region, we intend to support alternatives that result in the most improvement to LOS to arterials in the County unincorporated areas and has the least impact to public health, air quality, and private property.

Alternatives or significant improvements that would encroach into the Los Angeles River have not been developed in such detail to accurately ascertain the impact to the ecosystem in the river in general, or more specifically to the level of flood protection in the region. Comments will be provided when design alternatives have been further refined.

Technical Study Methodologies

Although Public Works has full confidence in the competency of the engineering team and the Air Quality/Health Risk Assessment consultants, the County will hold comments on the Technical Study Methodologies pending review of the South Coast Air Quality Management District's comments.

We appreciate the opportunity to comment. If you have any questions, please contact Mr. Phil Doudar of the Programs Development Division, Unincorporated Area Services at (626) 458-5926 or pdoudar@dpw.lacounty.gov.

GAIL FARBER
Director of Public Works

Patrick V. DeChellis
PATRICK V. DeCHELLIS
Deputy Director

PKD:re
C110120
P:pdpub\UAS\I-710 Corridor\8.9.10

cc: Supervisor Gloria Molina (Nicole England)
Supervisor Mark Ridley-Thomas (Dan Rosenfeld)
ELA Local Advisory Committee (Gustavo Camacho)
Gateway Cities Council of Governments (Jerry Wood)
Los Angeles County Metropolitan Transportation Authority (Ernest Morales)

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

August 11, 2010

Garrett Damrath
Caltrans District 7, MS 16A
100 South Main Street, Suite 100
Los Angeles, CA 90012

RE: COUNTY OF LOS ANGELES DEPARTMENT OF REGIONAL PLANNING RESPONSE TO I-710 CORRIDOR PROJECT EIR/EIS PURPOSE AND NEED; ALTERNATIVES; AND TECHNICAL STUDY METHODOLOGIES

Dear Mr. Damrath:

Thank you for the opportunity to comment on the I-710 Corridor Project environmental analysis progress. The Department of Regional Planning previously commented on the I-710 Corridor Project Notice of Preparation on September 17, 2008 indicating that the Transportation System Management/Transportation Demand Management (TSM/TDM) alternative should be fully considered. While the subsequent screening analysis dropped this alternative from further consideration for evaluation in the EIR/EIS, it is appropriate that the remaining alternatives, aside from no build, will include some TSM/TDM, transit, and Intelligent Transportation System improvements.

The I-710 Corridor study area has long been impacted by the congestion and air quality degradation associated with freight movement along the I-710 freeway. A stated purpose of the I-710 Corridor Project is to improve air quality and public health. To achieve this will require a comprehensive alternative that will simultaneously involve roadway design improvements, innovative technology, and demand management. Among the four alternatives being evaluated in the EIR/EIS, **Alternative 6B: I-710 Widening plus Freight Corridor (Zero-Emission Vehicles)** is most consistent with policies of the Los Angeles County General Plan to ensure good air quality, efficient freight movement, economic development, and community livability.

The Los Angeles County General Plan is being updated to account for the need to reduce greenhouse gas emissions (GHG) as required by AB 32. Alternative 6B is the most appropriate as it would restrict the use of the freight corridor to zero-emission trucks. Coordinated with demand management strategies, Alternative 6B has the potential to appreciably reduce GHG as well as criteria pollutants—a step in the right direction of improving air quality and public health for those communities in the I-710 Corridor study area.

While Caltrans has determined that a stand-alone Health Impact Assessment is not necessary, it was recommended by a broad coalition of public health advocates during the outreach process for this project, which indicates a very strong public concern about health impacts associated with the project. With this in mind, it is good to know that Caltrans will ensure that the project studies and the Draft EIR/EIS will include a focused assessment of public health considerations.

Please keep the Department of Regional Planning informed of the progress of the I-710 Corridor Project. If you have any questions, please contact Mark Herwick of my staff at (213) 974-6423 or via email at mherwick@planning.lacounty.gov. Our offices are open Monday through Thursday from 7 a.m. to 6 p.m. We are closed on Friday.

Sincerely,

Jon Sanabria
Chief Deputy Director

JS:MSH

cc: Richard J. Bruckner, Director

Department of Water and Power the City of Los Angeles

ANTONIO R. VILLARAIGOSA
Mayor

Commission
LEE KANON ALPERT, *President*
THOMAS S. SAYLES, *Vice-President*
ERIC HOLOMAN
JONATHAN PARFREY
BARBARA E. MOSCHOS, *Secretary*

AUSTIN BEUTNER
General Manager
RAMAN RAJ
Chief Operating Officer

August 11, 2010

Mr. Garrett Damrath
California Department of Transportation
100 South Main Street, MS 16A, Suite 100
Los Angeles, CA 90012

Dear Mr. Damrath:

Subject: Interstate 710 (I-710) Corridor Project Environmental Impact Report/Environmental Impact Statement (EIR/EIS) Purpose and Need, Alternatives, and Explanation Technical Study Methodologies

This is in response to the July 8, 2010 letter and enclosures from Mr. Ronald J. Kosinsky, Deputy District Director of Environmental Planning for the California Department of Transportation - District 7, regarding the Purpose and Need, Alternatives, and Technical Study Methodologies for the I-710 Corridor Project.

In our previous letter dated September 10, 2009 (enclosed), we recommended the following language be incorporated into the Project Purpose:

"Maintain Full Utilization of the Adjacent Electric Transmission Corridor."

Your response, contained in one of the enclosures with your July 8, 2010 letter, was as follows:

"The project team recognizes the importance of maintaining utilization of the transmission corridor. As part of the I-710 Corridor Project, a comprehensive utilities analysis and relocation plan will be completed. However, maintaining the utilization of the adjacent electric transmission corridor is not applicable as a Project Purpose."

Regarding the part of your response that states "maintaining the utilization of the adjacent electric transmission corridor is not applicable as a Project Purpose," we offer the following comment:

According to Section 15126.6(c) of the California Environmental Quality Act (CEQA) Guidelines "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." Under Section 1.5, I-710 Corridor Purpose and Need, of the Technical Memorandum Alternatives Screening Analysis, May 29, 2009, there were ten basic objectives used to screen alternatives as follows:

- Improve air quality and public health.
- Improve traffic safety.
- Eliminate highway design deficiencies.
- Increase nobility.
- Accommodate growth in population, employment and activities related to goods movement.
- Minimize right-of-way impacts.
- Minimize impacts to Section 4(f) Properties.
- Reduce energy consumption.
- Ensure environmental justice.
- Promote cost effectiveness.

Under the right-of-way analysis, three different right-of-way impacts were evaluated: residential properties, non-residential buildings, and regionally significant utilities. The impact analysis to regionally significant utilities considered the number of potential transmission tower relocations to Southern California Edison and to the Los Angeles Department of Water and Power (LADWP). While the number of potential tower relocations is an indication of the level of impact, a more direct concern to LADWP is the potential reduction in electrical service that would occur during their relocation. Consequently, we recommended that "Maintain full utilization of the adjacent electric transmission corridor" be incorporated as an objective under the project Purpose and Need. We would appreciate an explanation why this is not applicable as a Project Purpose. In addition, we are somewhat troubled that one of the enclosures that accompanied your letter, Draft Report for the I-710 Corridor Project Purpose and Need Statement, July 8, 2010, includes only five of the ten objectives that were used to screen alternatives. The objectives must be the same throughout the EIR.

Regarding the part of your response that states "As part of the I-710 Corridor Project, a comprehensive utilities analysis and relocation plan will be completed," we offer the following comment:

LADWP is very concerned about the timing and consideration of this analysis in the EIR/EIS process because the analysis may reveal a potentially significant level and duration of reduction in electrical service to LADWP's customers associated with the relocation of its towers. Consequently, this analysis should be completed as soon as possible in order to develop mitigation and/or alternatives to minimize the potential impacts, and to disclose this information in the Draft EIR/EIS document.

LADWP appreciates the part of your response that states that "The project team recognizes the importance of maintaining utilization of the transmission corridor," and looks forward to working with your agency to accomplish this objective.

If you have any questions, please contact Mr. Thomas A. Dailor at (213) 367-0221.

Sincerely,

Austin Beutner

TAD:aq
Enclosure
c: Thomas A. Dailor

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road, Suite 101
Carlsbad, California 92011

In Reply Refer To:
FWS-LA-08B0786-10TA0902

AUG 12 2010

Mr. Ron Kosinski
Deputy District Director, District 7
Environmental Planning
California Department of Transportation
100 South Main Street
Los Angeles, California 90012

Attention: Garrett Damrath

Subject: Project Alternatives and Screening Criteria for the I-710 Corridor Project, Los Angeles County, California

Dear Mr. Kosinski:

We have reviewed your letter and enclosed documents, which were received on July 12, 2010. Your letter requests our comment on the Purpose and Need, project alternatives, and study methodologies for the I-710 Corridor Project, in accordance with Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) 2005. Our primary concern and mandate is the protection of public fish and wildlife resources and their habitats. We have legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. We are also responsible for administering the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*). We offer the following comments pursuant to SAFETEA-LU, and in keeping with our agency's mission to work "with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people."

Your letter states that six preliminary alternatives were presented to the public for consideration in August of 2008, and an alternatives screening analysis was conducted to determine whether any alternatives should be modified or withdrawn from further consideration. While your letter states that comments and suggestions from participating and cooperating agencies on the alternatives were seriously evaluated as a part of this process, we note that your agency did not coordinate with us on the screening criteria or the range of alternatives to be carried forward for further review. In addition, the screening criteria listed in the Final Technical Memorandum – Alternatives Screening Analysis (Metro, 2009) do not address U.S. Fish and Wildlife Service (USFWS) trust resources and concerns, as listed in our comment letter on the Notice of Preparation of a Draft Environmental Impact Report for the subject project, dated September 29, 2008 (enclosed).

TAKE PRIDE IN AMERICA

While we have no comment on the *Purpose and Need Statement* (URS August 18, 2009) for the subject project, as memorialized in our letter dated October 7, 2009 (enclosed), we are concerned regarding the lack of coordination with our agency on the screening criteria and range of alternatives. We request that Caltrans provide us with maps and information on how the alignments will affect USFWS trust resources such as migratory birds, the wetlands in which they live, the federally endangered least Bell's vireo (*Vireo bellii pusillus*) and California least tern (*Sternula antillarum browni*), and the federally threatened western snowy plover (*Charadrius alexandrinus nivosus*), as well as any suitable remnant habitat for rare and endangered plants such as federally endangered Lyon's pentachaeta (*Pentachaeta lyonii*), salt marsh bird's beak (*Cordylanthus maritimus* subsp. *Maritimus)*, and Federal candidate Brand's phacelia (*Phacelia stellaris*).

In addition, I request that you contact Sally Brown of my staff (760) 431-9440, extension 278, at your earliest convenience, to schedule a meeting to discuss the screening criteria and range of alternatives for the subject project. We appreciate the opportunity to comment on the project and to participate in the transportation planning process.

Sincerely,

for Karen A. Goebel
Assistant Field Supervisor

Enclosures (2)

cc:
Phuong Trinh, U. S. Army Corps of Engineers, Los Angeles, CA
L.B. Nye, California Regional Water Quality Control Board, CA
Jaime Jackson, California Department of Fish and Game, CA
Chris Ganson, U. S. Environmental Protection Agency, CA
Stan Glowacki, National Oceanic & Atmospheric Administration, CA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

August 20, 2010

Michael Miles, District Director
California Department of Transportation – District 7
100 South Main Street, Suite 100
Los Angeles, CA 90012

Subject: EPA Response to Caltrans Request for Feedback on I-710 Corridor Project (I-710 Project) from Ocean Boulevard in the City of Long Beach to State Route 60 (SR-60) in Los Angeles County, California

Dear Mr. Miles:

This letter provides US EPA comments and recommendations, as well as several overarching recommendations, in response to the July 8, 2010 request for our agency review of the following documents for the proposed I-710 Project:

1. Project Purpose and Need and Response to Comments Matrix,
2. Protocol for the Air Quality and Health Risk Assessments,
3. Technical Work Plan for Environmental Justice Analysis, and
4. Alternatives Screening Analysis

US EPA focus and heightened interest in the project area is due to the cumulative current and anticipated future public health impacts the local community surrounding the I-710 Corridor is experiencing as a result of goods movement. I was able to view the project corridor and surrounding area during a recent tour of the project corridor with US EPA Region 9 Regional Administrator Jared Blumenfeld and a group of government and local stakeholders. While great strides are being made to improve air quality regionally, there is a disproportionate burden to the communities near the Ports of Los Angeles and Long Beach. The South Coast Air Quality Management District's Multiple Air Toxics Exposure Study (MATES) found that air toxics-related cancer risks in the Los Angeles area declined 8% between the MATES II (1998-99) and MATES III (2005) study periods, but air toxics-related cancer risks increased 17% in the ports area (Ports of Los Angeles and Long Beach) during that same time period.[1] Implementing measures to reduce air quality impacts as a part of the proposed project is critical to improving the public health of the disproportionately burdened community in the project area. Reducing air quality impacts is also critical for demonstrating compliance with Department of Transportation (DOT) Order To Address Environmental Justice in Minority Populations and Low-Income

[1] Based on photochemical modeling of air toxics emissions in the Los Angeles Area: South Coast AQMD's MATES III report, Page 4-16, http://aqmd.gov/prdas/matesIII/MATESIIIFinalReportSept2008.html

Populations and Title VI of the Civil Rights Act of 1964 (and related statutes and policies), which prohibit discrimination on the basis of race, color, national origin, sex, age and disability.

Our interest in contributing to this project and providing expertise to assist in meeting goods movement needs while reducing public health impacts is evidenced through our participation as a Participating Agency pursuant to SAFETEA-LU, as a Cooperating Agency pursuant to NEPA and as a member of the Air Agency Technical Working Group (AATWG). US EPA's participation[2] has provided multiple opportunities for USEPA recommendations for the development of the EIS for this project, including formal scoping comments (9/26/08), formal purpose and need comments (10/1/09), verbal feedback on the EJ analysis (10/20/09), and formal feedback on the Air Quality Assessment Protocol (2/5/09) (copies of formal correspondence attached). These opportunities have allowed for US EPA to provide formal and informal recommendations regarding our primary concerns and recommendations for the analysis of air quality impacts and health impacts associated with the proposed Project. We hope that our continued coordination can be an iterative process, with the purpose of continued dialog between our agencies to address regulatory and environmental challenges, as well as methodology for assessment of health impacts, in advance of publication of the DEIS.

1) In order to set the project in the context of various goods movement options in the corridor, please include in the DEIS an alternative that would result in lower emissions and greater air quality and public health benefits, even if that alternative is outside Caltrans jurisdiction (in whole or in part).

US EPA commends Caltrans for including as a purpose of the project to "Improve air quality and public health." However, it appears that all achievable "build" alternatives are estimated to increase diesel particulate matter and thereby worsen air quality and public health. The Alternatives Analysis dated May 9, 2009 includes consideration of alternative technologies for freight movement, yet states that alternative freight movement technologies alone cannot meet the stated Purpose and Need. Through this letter, US EPA reiterates our concern that the adopted Purpose and Need is too narrow and therefore leads to elimination of reasonable alternatives. As stated in our formal comments on the Purpose and Need, provided to your agency in October 2009 (attached), *"It is critical that the Purpose and Need should not prescribe a solution nor should it imply a predetermined solution such as an expansion of a freeway... Freeway capacity enhancements may be an included component of the potential solution to the problems identified in a Purpose and Need; however, the Purpose and Need should allow for the analysis of a full scope of alternatives, including other modes of transportation"* By limiting the scope of analysis with a Purpose and Need that is too narrow (by requiring improving design deficiencies of I-710, for example), Caltrans has eliminated all alternatives that do not increase capacity on I-710. We support zero-emission technology for freight movement and urge Caltrans

[2] EPA's participation as a Participating or a Cooperating Agency does not constitute formal or informal approval of any part of this project under any statute administered by EPA, nor does it limit in any way EPA's independent review of the Draft and Final EISs pursuant to Section 309 of the Clean Air Act. EPA has provided extensive comments for the development of the Draft Environmental Impact Statement (DEIS) for this project pursuant to the Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. Caltrans has assumed responsibilities under NEPA for this project pursuant to the *Memorandum of Understanding between the Federal Highway Administration (FHWA) and Caltrans Concerning the State of California's Participation in the Surface Transportation Project Delivery Pilot Program.*

to include in the EIS an analysis of an alternative that fully incorporates zero-emission technology as well as an alternative that does not require capacity improvements, and associated increases in air quality and public health impacts. We note that Caltrans has not yet demonstrated that zero-emission technology is either reasonable or capable of being implemented in a timely manner and therefore it is not clear that the range of alternatives presented include reasonable options to improve air quality and public health. The DEIS will need to demonstrate that the zero-emission technology alternatives proposed for analysis are reasonable.

In addition, the materials provided to US EPA to date for this project do not clearly describe how the I-710 project integrates with a regionwide goods movement strategy that affords the most protection of human health possible. This holistic view is consistent with the State of California *Goods Movement Action Plan* (2007), which is "based on the fundamental principle that infrastructure project actions, public health and environmental mitigation actions, and community impact mitigation actions must be approached on a simultaneous and continuous basis" (p. I-5). For example, what assumptions are included regarding the adjacent rail network regarding potential alternative technology solutions and capacity for freight movement? We note that the State of California's *Goods Movement Action Plan* also describes at least two planned rail capacity enhancement projects with listed benefits of "Reduces truck trips on Interstate 710" (p. I-16). EPA recommends that Caltrans describe all coordination with multiple agencies responsible for moving freight in the region and clearly describe how the development of the alternatives proposed for the I-710 project has incorporated information about other ongoing efforts, such as the Southern California International Gateway Project, which, if electrified would allow for increased goods movement and reduce health impacts. Specifically, Caltrans should look at options outside of Caltrans' jurisdiction to see whether they might achieve freight-movement objectives with lower emissions.[3]

2) Please provide US EPA an opportunity to review and provide feedback on Caltrans Strategy to analyze health-related impacts of the I-710 project.

During a March 4, 2010 meeting between US EPA and Caltrans (Ron Kosinski and Garrett Damrath) US EPA requested the following information: 1) A proposed strategy for assessment/analysis of health impacts; 2) Proposed methods for analysis of environmental justice impacts of the project; and 3) Proposed project alternatives to be analyzed under NEPA. While two of the three documents have been provided to us per the July 8, 2010 package, I understand that a proposed strategy for assessing health impacts, in lieu of a Health Impact Assessment, has not been shared with my staff for our review as a cooperating agency. We appreciate the opportunity to provide feedback, again, on the Protocol for the Air Quality and Health Risk Assessment. However, we note that Page 2 of the July 8, 2010 Caltrans cover letter provided to USEPA requesting our agency feedback on multiple documents included the following statement:

[3] An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable. A potential conflict with local or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered. (40 CFR Part 1506.2(d).) Further, alternatives that are outside the scope of what Congress has approved or funded must still be evaluated in the EIS if they are reasonable, because the EIS may serve as the basis for modifying the Congressional approval or funding in light of NEPA's goals and policies. (40 CFR Part1500.1(a).)

"Based upon a review of previous research by air quality experts and academic specialists, Caltrans does not agree that a stand-alone HIA is necessary. Many HIA components are beyond the scope of a transportation improvement project. However, we do believe that a focused discussion of relevant health issues is appropriate given the high level of public health concerns in the 1-710 Corridor. To that end, the project studies and the Draft EIR/EIS will include a focused assessment of public health considerations. Caltrans will continue to monitor any scientifically relevant developments in this important area."

As discussed during the March 2010 meeting, we continue to request that Caltrans share with us, in advance of publication of the DEIS, the proposed strategy and methodology for the "focused assessment of public health considerations" that will address the expectations raised by the public and agencies for a robust assessment of health impacts. Further, in light of the decision by the Gateway Cities COG to plan and upgrade their "their Air Quality Action Plan (AQAP) by including an HIA, if a scope of work can be developed" and Caltrans intent to "monitor the progress of this separate AQAP" (page 2 of the Caltrans Response to Comments on Purpose and Need), we request justification by Caltrans for the decision to not incorporate this information into the environmental review process for the proposed project. We recommend that if an HIA is being completed by partner agencies, that information produced from that effort be incorporated into decision-making for the I-710 project. The State of California Goods Movement Action Plan also highlighted the importance of reducing public health impacts related to goods movement by stating "if investments are not made to address the serious environmental and community concerns associated with goods movement sources and increases in goods movement sources, already high levels of air pollution, along with the associated health effects and other environmental and community impacts, will continue to increase and harm public health and quality of life (p. I-3). We also recommend that, when screening and choosing a preferred alternative, as well as when analyzing impacts from all alternatives in the DEIS, Caltrans should employ a robust assessment of social costs and benefits, including health impacts and their costs, for each alternative considered. Please coordinate with my staff to identify a process for US EPA to review and provide feedback on Caltrans' strategy for addressing health impacts.

3) Please coordinate a combined meeting with all federal regulatory agencies that have a role in potentially permitting, reviewing, or approving this project. Specifically, a meeting with Caltrans, US Army Corps of Engineers and US EPA is warranted given the uncertainty regarding impacts to jurisdictional waters of the United States in the LA River.

The July 8, 2010 cover letter to US EPA indicated an interest by Caltrans in implementing the NEPA/404 Merger Agreement. US EPA recommended that Caltrans initiate the NEPA/404 Process through our formal scoping letter in September 2008 (if it was determined that the threshold of "impacts to greater than 5 acres of waters of the US (WUS)" were anticipated). The intent of the merger agreement is to obtain certainty, in alignment with the NEPA process, regarding project elements related to Clean Water Act Section 404 permitting including project Purpose and Need, Range of Alternatives, and preliminary Least Environmentally Damaging Practicable Alternative, the only project that is permittable under CWA Section 404(b)1 Guidelines.

If Caltrans has determined that greater than 5 acres of impacts to waters of the United States will result from one of the proposed alternatives, it is appropriate to initiate the merger agreement as soon as possible and without further delay. However, our agency has been provided with no information to indicate the extent and nature of estimated impacts to waters of the United States anticipated from the proposed project, aside from the alternative screening table dated May 2009 indicating 3700 linear feet to WUS. Please organize a meeting as soon as possible between Caltrans, US EPA, and Army Corps of Engineers so that we can receive necessary information to determine if the project impacts support coordination under the NEPA/404 Merger Agreement. Our staff-level discussions with the Army Corps of Engineers support the need for such a meeting. US EPA defers providing agreement on the NEPA/404 checkpoints, including additional detailed feedback on the Alternatives to be carried forward for analysis in the DEIS, until such a meeting occurs. Please work with my staff as soon as possible to set up the coordination meeting.

I appreciate the opportunity for US EPA to provide feedback on Caltrans proposed solution to accommodating increased goods movement while improving air quality and public health. Please see the attached additional detailed comments and recommendations following our review of the documents provided for US EPA review on July 8, 2010. Because this project's potential implications for environment and human health, EPA will continue to prioritize early collaboration on the I-710 project. We appreciate the opportunity to work with you in this capacity, and are committed to assisting you in producing a high quality EIS which accurately assesses the potential impacts of the project, measures to reduce those impacts, and opportunities to mitigate impacts that cannot be further reduced. Based on the information and follow-up meetings requested through this letter, I anticipate US EPA providing additional feedback in advance of publication of the DEIS. Please continue to include us in participating and cooperating agency correspondence and early document review.

Sincerely,

Enrique Manzanilla
Director, Communities and Ecosystems Division

Enclosures:

US EPA Detailed comments on 1) Purpose and Need, 2) Air Quality and Health Risk Assessment, 3) Environmental Justice Technical Workplan, and 4) Alternative Analysis
October 1, 2009 EPA Comments on Draft I-710 Project Purpose and Need Statement,
February 5, 2009 EPA Comments on the Air Quality Assessment Protocol
September 26, 2008 EPA Scoping Comments on the Notice of Intent for the Draft EIS

CC: Walter Waidelich, CA Division Federal Highway Administration
Dale Jones, Caltrans Regional Environmental Coordinator
Ron Kosinski, Caltrans District 7

Gregg Albright, Business Transportation and Housing
Cynthia Marvin, California Air Resources Board
Geraldine Knatz, Port of Los Angeles
Richard Cameron, Port of Long Beach
Hasan Ikhrata, Southern California Association of Governments
Susan Nakamura, South Coast Air Quality Management District
Carol Gomez, South Coast Air Quality Management District
Dr. Paul Simon, Los Angeles County Department of Public Health
Romel Pascual, City of Los Angeles, Environment
Rita Robinson, City of Los Angeles, Transportation
Michael LoGrande, City of Los Angeles, City Planning
David Castanon, U.S. Army Corps of Engineers
Sally Brown, U.S. Fish and Wildlife Service

EPA DETAILED COMMENTS ON I-710 PROJECT: PURPOSE AND NEED, AIR QUALITY/HRA, ENVIRONMENTAL JUSTICE TECHNICAL WORKPLAN, AND ALTERNATIVES SCREENING ANALYSIS, AUGUST 20, 2010

The following detailed comments and recommendations are provided following the review of the 4 documents provided to us on July 8, 2010. Thanks for the opportunity to review and provide feedback in advance of publication of the Draft EIS.

1. Project Purpose and Need and Response to Comments Matrix,
2. Protocol for the Air Quality and Health Risk Assessments,
3. Technical Work Plan for Environmental Justice Analysis, and
4. Alternatives Screening Analysis

1) Purpose and Need

On October 1, 2009, EPA provided formal comment on the *Draft I-710 Corridor Project Purpose and Need Statement* dated September 1, 2009. In light of the significant public health concerns in the project area, EPA commends Caltrans for reiterating one purpose of the project is to 'Improve air quality and public health". EPA continues to encourage Caltrans to ensure that improving air quality and public health serves as a guiding tenet as the Project evaluation moves forward. We also appreciate the response to our comments provided in matrix format for easy comparison of our agency comments and Caltrans proposed response. However, we note that we continue to recommend several points related to the stated Purpose and Need for the project.

Purpose and Need Statement Must Not Preclude a Reasonable Range of Alternatives

Our October 1, 2009 letter commenting on the September 1, 2009 Draft I-710 Corridor Project Purpose and Need Statement stated:

... the Purpose and Need for a project should be broad enough to cover the full breadth of a reasonable range of alternatives regardless of what the future findings of an alternatives analysis may be. It is critical that the Purpose and Need should not prescribe a solution nor should it imply a predetermined solution such as an expansion of a freeway or an entirely new freeway to meet a future congestion need. The Purpose and Need should focus on the underlying problems to address and the reasons a project is considered and should not be written in a way that includes the solution itself. Freeway capacity enhancements may be an included component of the potential solution to the problems identified in a Purpose and Need; however, the Purpose and Need should allow for the analysis of a full scope of alternatives, including other modes of transportation. Other modes of transportation may also be components of the potential solutions to the problems identified in the Purpose and Need.

We note that the present draft of the Project Purpose and Need includes the following 5 purpose statements:

1. Improve air quality and public health
2. Improve traffic safety
3. Address design deficiencies
4. Address projected traffic volumes
5. Address projected growth in population, employment, and economic activities related to

goods movement

As stated above through EPA's previous comment letter, some of these purposes are components of potential solutions, and thereby limit the range of reasonable alternatives to only those solutions that can meet each stated purpose. The Response Matrix indicated that a separate Initial Feasibility Analysis was prepared to consider if TSM/TDM and Alternative Goods Movement Technology System could be analyzed as alternative solutions as a part of the I-710 project; however, including the need to "address design deficiencies", for example, as a project purpose limits the range of alternatives to only those that will address design deficiencies on I-710 and precludes other modal alternatives (alternative technology to move goods on nearby rail, for example). We stress the need to allow for a reasonable range of alternatives, and thereby continue to recommend that the purpose and need statement be broadened beyond its current stated purposes to allow for a wider range of potential solutions, including alternatives that are more protective of human health and result in fewer air quality impacts.

Demonstrate Independent Utility for the Proposed Project

Our comments on the Draft Purpose and Need Statement also included the following comment regarding project independent utility/segmentation of the project:

The revised Purpose and Need Statement, future project analyses and the DEIS should clearly demonstrate the independent utility of the Project within its current geographic limits as it relates to the need for the project. If the project need cannot be met without future planned improvements, the scope of the project should be expanded accordingly, such as including an analysis of future improvements to I-710, I-105, SR-91, SR-60, I-10 and I-405, since these would be considered connected and similar actions (40 CFR 1508.25). EPA believes this is the most effective way to address indirect and cumulative environmental impacts, and also ensures that a broader scope is applied in the identification and evaluation of project alternatives that may be less environmentally damaging. Generally, funding or constraints of project staging and construction should not be used as a basis for segmenting the evaluation of environmental impacts under NEPA.

We continue to have concerns that improvement to adjacent and connected facilities will be necessary to absorb the additional traffic volumes that will be induced by volume capacity increases on the 710 and that these improvements are connected actions that should be analyzed within the DEIS for this project.

2.) Air Quality and Health Risk Assessment

On February 5, 2009, EPA provided formal comment on the *Draft Protocol for the Air Quality and Health Risk Assessments* dated January 2009. A copy of that comment letter is attached. The below comments and recommendation follow from our review of the *Draft Protocol for the Air Quality and Health Risk Assessments* dated March 2009.

Please quantify 1) PM 2.5-related mortality and morbidity, and 2) PM2.5 and air toxics impacts from construction activities.

We commend Caltrans for their commitment to completing a quantitative analysis of PM2.5 concentration changes and air toxics-related health risks as a result of the proposed project. However, as discussed in our letter dated February 5, 2009, we continue to believe that Caltrans should expand their proposed analysis in two significant ways: (1) quantify PM 2.5-related mortality and morbidity, and (2) quantify the PM2.5 and air toxics impacts from construction activities. Specifically, EPA continues to strongly recommend that the protocol include a quantification of mortality and morbidity incidence and monetary benefits and impacts for project-related PM 2.5 emissions. EPA has experience conducting such analysis at the scale of the I-710 project and is available to work with Caltrans and California's Office of Environmental Health Hazard Assessment (OEHHA) to identify project-appropriate analysis methods.

In addition, we continue to be concerned that air toxics may be underestimated if construction activity is not properly characterized. Therefore, we reiterate our recommendation that the protocol include quantification of PM2.5 air toxics emissions and dispersion for project-related construction, including an analysis of construction-related impacts throughout the project area and on a hotspot basis for a representative construction staging area.

Please update the protocol to address children's health considerations

Since our February 5, 2009 letter commenting on the scope of the protocol, concerns about potential impacts to children's health from the project have been raised by multiple organizations and concerned residents. Because children can be both more susceptible to mobile source air pollution and generally experience higher exposures from air pollution than adults, we recommend that the protocol specifically address direct consideration of the impacts of the project on children's health, including consideration of prenatal exposures (exposures that may be experienced by pregnant women), in the health risk assessment. It is US EPA's policy in the context of Section 309 EIS reviews to request that an analysis of impacts to children be included in the EIS if there is a possibility of disproportionate impact on children related to the proposed action (http://www.epa.gov/compliance/resources/policies/nepa/children-health-risks-pg.pdf), as is anticipated for this project. We commend Caltrans for including an analysis of sensitive receptors, including schools and daycares in the protocol for dispersion modeling (pages 3-14). Considering the nature of this project, the health risk assessment should also include the following considerations. We are available to assist Caltrans in addressing these areas and note that there is considerable expertise within the State of California with regard to assessing environmental impacts to children.

- *Children's exposures and susceptibilities to pollutants of concern.* We recommend that a characterization of children's exposures and susceptibilities to pollutants of concern be included in the protocol as follows:

  Hazard Identification: As noted in the protocol, the first step of the HRA will be Hazard Identification. The protocol should specify that special concerns for children's

susceptibilities will be identified and qualitatively discussed in this stage of the HRA. There is a large volume of literature on children's susceptibility to near roadway pollution to draw from for this qualitative discussion.

Exposure Assessment: This step should include an analysis of exposures at schools, daycares, and parks. The entire exposure assessment should incorporate child-specific exposure factors using EPA's Child Specific Exposure Factors Handbook, 2008 (http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=199243) or an equivalent source recommended by the State of California. In addition, we recommend the use of the recommended age groupings found in EPA's Guidance on Selecting Age Groups for Monitoring and Assessing Childhood Exposures to Environmental Contaminants, 2005 (http://www.epa.gov/raf/publications/pdfs/AGEGROUPS.PDF). The document describes a set of age groupings that can be used, and when necessary adapted, for purposes of designing monitoring studies and conducting risk assessments focused on children.

Dose-Response Assessment: This step of the protocol should include a qualitative discussion of whether the dose-response values being used in the risk assessment include a consideration of children's susceptibilities. Where a chemical has been identified as a concern for children through the Hazard ID process but the dose-response value that is being used does not appear to take into account that susceptibility, this should be discussed qualitatively as an uncertainty in the risk characterization section of the risk assessment.

Risk Characterization: This stage of the protocol should include a qualitative analysis of the known and expected risks to children living, playing, or going to school near the project site.

- *Impacts on Childhood Asthma.* The protocol should specify consideration of data on existing asthma rates and asthma severity among children (and the general community) living, playing, and attending school and daycare near the project site. To the extent feasible, the Risk Characterization, Cumulative Impacts Analysis, and EJ Analysis should identify impacts of the project on asthma rates and severity in children near the project site and should quantify the costs associated with these impacts.

- *Health and learning impacts of noise near homes and learning centers (schools and daycares).* Qualitative consideration of impacts from noise on both health and learning may be considered within the protocol in the following contexts: (1) Hazard Identification, (2) Risk Characterization, (3) the Cumulative Impacts Analysis, and (4) EJ Analysis.

- *Impacts that may contribute to environmental factors of obesity.* Similar to addressing impacts from noise, the protocol could consider impacts that might contribute to the growing epidemic of childhood obesity (such as how the project might affect routes to schools, and how the project might affect accessibility of neighborhood parks, green spaces, and recreation areas). These impacts could be considered in the following

contexts: (1) Hazard Identification, (2) Risk Characterization, (3) the Cumulative Impacts Analysis, and (4) EJ Analysis.

Integrate a discussion of Air Quality Impacts with the analysis other project-related impacts

Finally, with respect to the overall characterization of health concerns, we encourage Caltrans to include a discussion of air quality impacts (including the helpful description of impacts in Table 1-1 of the Air Quality Protocol as well as the results of the health risk assessment and PM2.5 analysis) in a larger, more robust discussion of project impacts and benefits. For example, in the context of cumulative impacts, air quality impacts should be discussed with information on other community-scale and individual stressors, such as noise, changes in mobility (e.g. impacting access to healthy foods or healthcare), community cohesion and identity, etc, Such a discussion would best be combined in the framework of a Health Impacts Analysis (HIA).

3) Technical Work Plan for Environmental Justice

We appreciate the opportunity to review and comment on the Technical Work Plan for Environmental Justice Analysis for I-710 Corridor Project EIR/EIS (dated February 3, 2010). Following our review, we commend Caltrans for developing a robust methodology for analysis of potential impacts to the environmental justice communities along the I-710 Corridor and for including the following commitments:

- An environmental justice analysis of 12 specific areas and a description of how the analysis will be carried out.
- The specific inclusion of minority, low-income, elderly, and transit-dependent persons in the analysis.
- The inclusion of the environmental justice impacts of construction.
- Use of LA County as the larger geographic unit of comparison to the I-710 Corridor Study area and inclusion of a chart to display the demographic characteristics of the two areas.
- The specific inclusion of an analysis of the population under 5 years of age in the air quality analysis.
- Inclusion of multiple measures of income. Income distribution will help pick up the families that are low income but not under the poverty threshold.
- Examples of the format used for the tables. The tables are easy to understand and clearly display disproportionate impacts.

We also provide the following concerns and recommendations to further improve the proposed methodology.

Analyze Impacts to Children and the Elderly

We commend Caltrans for including in the work plan the proposal to analyze impacts on minority, low-income, elderly (over 65) and transit-dependent populations as Environmental

Justice populations. We further recommend that that an analysis of impacts to children be included in the EIS if there is a possibility of disproportionate impact on children related to the proposed action, (see Children's Health comments provided above), as there may be with the proposed project. Because children can be both more susceptible to mobile source air pollution and experience generally higher exposures from air pollution than adults, the health risk assessment should specifically identify and evaluate impacts of the project on children's health. Please be sure the methodology for analysis of Environmental Justice impacts distinguishes disproportionate impacts to children.

Consideration of Income

We recommend that the analysis for economic impacts/benefits include minority status in addition to income to assess whether or not areas with a high minority population are being disproportionately impacted by the project, or that project benefits are not only in areas with a low minority population.

We also recommend using both income quintiles and poverty status, as it leads to a more comprehensive analysis than using just one or the other. Additionally, we recommend the high cost of living in California be considered in the methodology. As an example, the environmental justice analysis completed for the *Berths 97-109 Terminal Improvement Project (China Shipping Line)*, proximate to the proposed project, included, the high cost of living as a part of its analysis methodology (see page 5-1 of the EIS).

Consideration of Roadway Proximity and Sensitive Receptors

We also recommend the work plan include a method for analyzing populations that live within a 500 foot buffer zone of the existing I-710 roadway, and also a 500 foot buffer zone from the roadway were the proposed project to be completed. We are also concerned that the analysis examine a sufficiently fine-grained resolution to analyze hot spots that may impact these communities. Where Traffic Analysis Zones are not fine enough in resolution to capture this information, we recommend looking at other geographic units of measurement. The impact on sensitive receptors could also be included in this analysis including schools, daycares, and senior centers.

Consideration of Non-Chemical Stressors

We commend Caltrans for proposing to analyze the 12 specific areas delineated, as doing so will help inform the separate environmental justice impacts of this project. We also recommend that the cumulative impacts be considered in this analysis. The work plan should identify a method for identifying which of these areas have disproportionate impacts.

4) Alternatives Screening Analysis

We have reviewed the *Technical Memorandum – Alternatives Screening Analysis*. We note that the document is dated May 29, 2009, but was provided to EPA with a request for our comment and review on July 8, 2010. Given that over a year has passed since this document was

finalized, we are concerned that Caltrans is seeking EPA review and comment on this particular document too late for any incorporation of meaningful feedback from our agency related to the range of alternatives and we are concerned that Caltrans does not intend to be responsive to feedback from our agency since so much time has passed since this document was finalized.

While we appreciate the opportunity to comment in advance of publication of the Draft EIS, we are concerned that more current information related to the potential impacts of the project (including updated estimates to jurisdictional Waters of the United States, information related to alternative technologies, and information related to status of rail enhancement on adjacent freight movement corridors) may be available since the development of this document in May 2009. Please provide the most up-to-date information to US EPA so that we can provide meaningful feedback.

Address Potentially Environmentally Superior Alternatives (Occurring in-Whole or in-Part) on Parallel Corridors in the DEIS

We note that all alternatives considered in the screening analysis are sited along the existing I-710 corridor. However, a parallel rail corridor exists that could potentially serve much of the freight traffic. As stated in the cover letter, it is unclear what role the adjacent rail line can play in accommodating future demand and how consideration of rail capacity has influenced the range of alternatives being proposed for analysis for the 710 project. For example, we understand that the Southern California International Gateway project that is currently in development is proposed to address some freight movement needs and could, if electrified, meet some of the corridor's goods movement needs while improving air quality and public health. Further, it is optimal for the potential proposed improvements along both the rail and the highway corridor to be analyzed as one goods movement system, using consistent assumptions for freight capacity needs, so that there is a holistic approach to the region's goods movement needs and public health goals, and so that ultimately the method of goods movement that is least impactful to public health and the environment may be employed. We strongly recommend including an analysis of freight movement along the entire regional corridor to inform the alternative proposed for analysis in the DEIS.

Include Regional Outcomes as a Criteria in Alternatives Screening Analysis

A project of this magnitude will significantly impact regional travel patterns; the increased number of vehicles accommodated by the roadway will distribute themselves across the region's highways and surface streets, contributing to congestion in an already congested region and causing delay to motorists elsewhere. This will in turn have implications for motorist delay, air quality, and greenhouse gas emissions.

We note the absence of consideration of regional Vehicle Miles Traveled (VMT) or Vehicle Hours Traveled (VHT) in the alternatives screening analysis. Further, while a fuel consumption metric is provided for the corridor, it becomes a meaningful indicator of energy consumption and environmental outcome only when calculated at the regional level. We strongly suggest including these metrics, measured at a regional scale, rather than at the project-corridor scale, in deciding which alternatives to select for further analysis. In order to correctly

estimate these parameters, the induced demand for vehicle travel resulting from roadway capacity increases must be included.

We also note the absence of any direct consideration of Greenhouse Gas emissions (GHGs) as part of the screening of alternatives. Greenhouse gas emissions are a critical environmental outcome of any transportation project, given that transportation tailpipe emissions alone comprise nearly 40 percent of California's GHG inventory. Because the project will affect regional traffic patterns, an analysis of greenhouse gas emissions should be undertaken at the regional level. For a highway capacity expansion project, a short run analysis, and one which considers only the highway or corridor itself, may show a decrease in emissions while emissions regionally increase. In general, roadway capacity increases have been found to increase, rather than decrease, GHG emissions in the long run (Moving Cooler, p. 41, Table 4.1 and footnote f)). Because GHG emissions are a critical outcome for the environment and human health, we strongly recommend they be analyzed as part of the alternatives screening analysis, and considered as a leading factor in choosing which alternatives are selected for further study.

Include an Analysis of an Existing, Proven Zero- Emissions Vehicle Technology in the Alternatives Screening Analysis

We commend Caltrans for choosing to investigate a zero-emissions freight transport alternative in the DEIS. While we support the analysis of a new technology, we are concerned that the zero-emissions alternative Caltrans has chosen advance for analysis in the DEIS may not be considered "reasonable" without effort by Caltrans to demonstrate that the technology can be implemented. Without a clear definition of the technology, analysis of impacts to public health and the environment under NEPA will be problematic. Any alternative considered under NEPA must be sufficiently developed and capable of implementing in a given timeframe so that all potential impacts and benefits can be determined and mitigation planned for. Also, if the technology will be phased in over time, it is necessary to include a timeline incorporating those benefits so that adverse impacts in the shorter term can be assessed. We strongly recommend Caltrans revise the alternatives screening analysis to fully demonstrate that the proposed zero-emission technology is reasonable. We also recommend that Caltrans analyze other, proven zero-emissions vehicle technology within the existing I-710 right of way, as well as along parallel corridors.

Include an Analysis of Additional TDM Measures in the Alternatives Screening Analysis

We also recommend Caltrans analyze an array of tolling alternatives on the corridor, and study combinations of freight and passenger vehicle tolling within the Alternatives Screening Analysis. We recognize that tolling may not be immediately available to Caltrans, however, given the fact that this area is already impacted and heavily burdened, the analyzed benefits of such an option may provide the justification needed to pursue opportunities for implementing tolling.

Consider Environmental Justice Factors in Methodology for Project Alternatives Screening

The Alternatives Screening Analysis states that "Due to similarities in the footprints, the environmental justice screening analysis did not distinguish meaningfully between the various alternatives." (p. 27). Because all alternatives considered are in the present I-710 corridor, it is true that the population proximate to all alternatives for the project is the same. But because an EJ population essentially surrounds the 710, EJ impacts could be expected to vary with the local environmental effects of the project--air pollution, noise, etc. These impacts do vary between the alternatives, as described in the results of the initial analysis performed to screen alternatives; therefore the EJ impact will vary between the alternatives. Thus, EJ impacts should be considered in the Alternatives Screening Analysis so that alternatives with reduced impacts to EJ populations can be selected for further consideration.

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

August 24, 2010

Mr. Garrett Damrath
California Department of Transportation
100 South Main Street, Suite 100
Los Angeles, CA 90012

Dear Mr. Damrath:

EVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT, ALTERNATIVES, AND EXPLANATION OF TECHNICAL STUDY METHODOLOGIES, I-710 CORRIDOR PROJECT, LOS ANGELES COUNTY (FFER #201000138)

The Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We have no comments at this time.

LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows and fire hydrants.

2. When a bridge is required to be used as part of a fire access road, it shall be constructed and maintained in accordance with nationally recognized standards and designed for a live load sufficient to carry a minimum of 75,000 pounds. All water-crossing designs are required to be approved by the public works department prior to installation.

3. The maximum allowable grade shall not exceed 15% except where topography makes it impractical to keep within such grade; in such cases, an absolute maximum of 20% will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topographical difficulties, should be no more than 17%. Grade breaks shall not exceed 10% in 10 feet.

4. All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.

5. All access devices and gates shall meet the following requirements:

   a. Any single gated opening used for ingress and egress shall be a minimum of 26 feet in width, clear-to-sky.

   b. Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.

   c. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way, and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.

   d. All limited access devices shall be of a type approved by the Fire Department.

   e. Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.

6. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review, prior to implementation.

7. Provide three sets of alternate route (detour) plans, with a tentative schedule of planned closures, prior to the beginning of construction. Complete architectural/structural plans are not necessary.

8. Notify the County of Los Angeles Fire Department, Battalion Headquarters Fire Stations, Batallion 3, 7, 9, and 13 that respond to areas within construction zones, at least three days in advance of any street closures that may affect fire/paramedic responses in the area.

9. Temporary bridges shall be designed, constructed, and maintained to support a live load of at least 70,000 pounds. A minimum vertical clearance of 13'6" will be required throughout construction.

10. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

11. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department.

We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

12. Submit proposals for all street vacations (closures) to the County of Los Angeles Fire Department, Land Development Unit for review and approval. The proposal shall be submitted through the Department of Public Works.

13. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit, Inspector Nancy Rodeheffer at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Final Environmental Document.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. Health Hazardous Materials Division has no objection to the proposed project.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

Frank Vidal

for JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:ss

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT CORPS OF ENGINEERS
P.O. BOX 532711
LOS ANGELES, CALIFORNIA 90053-2325

REPLY TO
ATTENTION OF

September 13, 2010

Regulatory Division
Asset Management Division

Ron Kosinski, Deputy District Director
Division of Environmental Planning, District 7
California Department of Transportation
100 South Main Street, Suite 100
Los Angeles, California 90012-3606

Attention: Garrett Damrath

Dear Mr. Kosinski:

This letter is in response to your request, dated July 8, 2010, for our comments on the updated purpose and need statement (July 8, 2010), alternatives screening analysis (May 29, 2009), and technical study methodologies for the I-710 Corridor Project ("Project") pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users ("SAFETEA-LU"). As a cooperating agency under the National Environmental Policy Act ("NEPA") for this Project, we submit the following comments for incorporation into the Environmental Impact Statement ("EIS") for the Project to ensure that the resulting EIS may be adopted by our agency for the purposes of exercising our regulatory authorities under Section 404 of the Clean Water Act (33 U.S.C. §1344), Section 14 of the Rivers and Harbors Act of 1899 (33 U.S.C. §408), as well as any real estate instruments or consents under 10 U.S.C. §2667/2668 .

1) Please include a clarification paragraph in the Introduction section of the EIS.

As we are coordinating with you as a cooperating agency, we recommend inclusion of a paragraph in the Introduction section that explains our role in this environmental review process. Please clarify that our agency intends to rely upon the resulting EIS to comply with NEPA for our Federal actions under the authorities stated above.

2) Comments previously submitted have not been fully addressed in the documents enclosed with the July 8, 2010 request.

By letter, dated September 16, 2009, we submitted preliminary comments to the Project purpose and need statements, dated August 18, 2009. The July 8, 2010 request includes responses to our comments, but does not fully acknowledge or address all

comments previously provided. Specifically, we commented that needs should be provided in terms of quantified deficiencies as compared to relevant standards, such as state standards or defined regional goals. While Caltrans responded that it would revise the Project purpose statement text to reflect quantification in the purposes, there was no mention about the need. Comparing alternatives against the no action alternative is required, but it is not a substitute for a clear statement of need. Based on the existing statement, it is unclear how to discern whether an alternative would meet the purpose and need. A clear statement is crucial for both our responsibilities under Section 408 and determination of overall project purpose under Section 404 of the Clean Water Act.

3) The Project objectives are not clearly related to the articulated Project purpose.

In our September 16, 2009, we also commented that it would be appropriate to consider whether all five objectives should be part of the Project purpose. This comment was not addressed in your response. In its August 20, 2010 letter, United States Environmental Protection Agency ("EPA") relayed its concerns regarding, in particular, the inclusion of addressing design deficiencies as part of the purpose statement. We also believe that inclusion of addressing design deficiencies in the purpose statement results in elimination of any alternatives that would not modify the I-710. Rather than including it as part of the purpose statement, correction of design deficiencies may be considered as a measure or constraint in design of alternatives that involve modifications to the I-710. We request that you clarify why inclusion of correction of design deficiencies is essential to your purpose, or alternatively, that you remove it to ensure that you do not narrow your range of alternatives impermissibly.

4) The Project purpose and need statements do not support the screening criteria.

It is unclear how the purpose and need statements support the screening criteria. The alternatives analysis employs quantitative standards without an explanation of the relationship to the purpose and need. Statements indicating that alternatives perform "poorly" or are "unacceptable" appear arbitrary, or without justification.

5) We are particularly concerned that Section 408 considerations are not taken into account in the documents provided.

We commented in our September 16, 2009 letter and in several joint meetings between our agencies that our agency's mission of providing flood control, in terms of the safe and effective operation of the Los Angeles River channel system, should be included as a potential constraint in meeting the need. While Caltrans stated in its response to comments document that the flood control constraint would be considered in relation to the purpose and need, there is nothing in any of the documents provided to reflect that the flood control constraint was considered. Similarly, the alternatives screening analysis

does not address Section 408 concerns. It considers impacts to rights-of-way for residential and non-residential property owners, and for utilities; however, it is silent on impacts to the Federal project area (the Los Angeles River). While it provides limited information on linear footage of impacts to the River in terms of waters of the United States, it does not provide any information on the amount, type, purpose or severity of modifications to the channel system associated with the various alternatives. The consideration of impacts to the flood control system as a criterion is absent. We are concerned that we will be unable to adopt the EIS if it does not incorporate our Section 408 considerations.

6) **The purpose and need statement must not preclude a reasonable range of alternatives.**

As we are concerned about the adequacy of your purpose and need statements and your screening criteria for our purposes, we are concerned that not all reasonable alternatives are being considered. We have previously raised whether a double-decker alternative has been considered. In addition, we also believe the consideration of rail capacity in developing and considering alternatives requires additional clarification.

7) **We recommend that the alternatives analysis be expanded to consider alternatives consistent with the 404(b)(1) Guidelines.**

For our agency to adopt another agency's EIS under our Section 404 of the Clean Water Act and Section 408 authorities, the alternatives analysis must be thorough enough to use for both our public interest review and determination of compliance with 404(b)(1) Guidelines (40 C.F.R. Part 230). As a result, we recommend incorporating alternatives required as part of our 404(b)(1) alternatives analysis into the EIS, including our no-action alternative, geographic alternatives (e.g., changes in location and other site specific variables), and functional alternatives (e.g., project substitutes and design modifications). Under the 404(b)(1) Guidelines, alternatives are considered practicable after taking into consideration cost, existing technology, and logistics in light of the overall project purpose. Although the Project scope is currently limited to the I-710, we must consider geographic alternatives under the 404(b)(1) Guidelines.

8) **Please provide the Corps with construction emissions data related to our Federal actions.**

Although not directly related to the NEPA process, we recommend that you analyze direct and indirect emissions related to our Federal actions under subpart B of the regulations implementing Section 176(c) of the Clean Air Act (40 C.F.R. Part 93). Specifically, we request that you provide data on direct and indirect emissions in tons per year for criteria pollutants and precursors related to construction occurring in our

jurisdiction. We would use such data to determine whether a conformity determination would be required under subpart B for any of our Federal actions. In case a conformity determination is required, having the public comment period for our draft conformity determination be concurrent with either the draft or final EIS comment period would provide for a more efficient process.

9) **We echo the need for a combined meeting with all Federal regulatory agencies that have a role in potentially permitting, reviewing or approving this Project.**

You state in your request letter that the letter serves to integrate the NEPA/404 process into the coordination that is already underway with our agency. However, the NEPA/404 process includes formal initiation and checkpoint meetings with our and other agencies. Formal checkpoints occur throughout the environmental review process, including the purpose and need statement/overall project purpose and the range of alternatives. We note that formal initiation of the process has not occurred while coordination under Section 6002 of SAFETEA-LU has proceeded into the range of alternatives. We feel that a meeting among Caltrans, EPA, and the Corps to discuss impacts to the Los Angeles River is warranted as soon as possible.

Thank you for the opportunity to provide feedback and comments. We look forward to continued participation and cooperation in the NEPA process for this Project. Should you have any questions pertaining to Section 408, please contact Mr. Phil Serpa, Asset Manager, by phone at (213) 452-3402 or, Ms. Phuong Trinh for Section 404 questions or comments at (213) 452-3372. Please refer to this letter and SPL-2008-934-PHT in your reply.

Sincerely,

Mark D. Cohen
Deputy Chief, Regulatory Division

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, Division of Environmental Planning
100 South Main Street, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0362
FAX (213) 897-0685
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September 1, 2010

Austin Beutner, General Manager
Los Angeles Department of Water and Power
111 North Hope Street
Los Angeles, CA 90012-2607

Re: Response to I-710 Corridor Project Participating Agency Comments on Purpose and Need

Dear Mr. Beutner:

We are responding to your letter dated August 11, 2010 regarding Los Angeles Department of Water and Power (LADWP)'s previous comments made on the I-710 Corridor Project's Purpose and Need statement. We thank you for your input as a SAFETEA-LU Section 6002 Participating Agency and are happy to take this opportunity to further explain our rationale.

According to the Standard Environmental Reference (www.dot.ca.gov/ser), a project purpose statement is defined as a "set of objectives that will be met to address the transportation deficiency." Although the Project Team fully recognizes the importance of maintaining full operation of the adjacent electric transmission corridor, please keep in mind that the Purpose and Need statement crafted for this project is specific to addressing the transportation issues on the I-710, and will focus on the multi-modal transportation system.

The Project Team did feel it prudent to include "minimization of right-of-way impacts" as alternative screening criteria during the Alternatives Screening Analysis, referenced on page 2 of your letter, and we do view this as a project objective. However, alternatives screening and the purpose and need statement are separate. According to Federal Highway Administration (FHWA)/Federal Transit Administration (FTA) Joint Guidance on Purpose and Need, dated July 23, 2003, "the purpose and need statement serves as the cornerstone for the alternatives analysis, but should not discuss alternatives." The assessment that avoiding operational disruption of the electric transmission corridor in question has been, and will continue to be, incorporated into alternatives analysis and final project approval. Not every alternative screening criterion will be included in the purpose and need, which will remain consistent within the Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). Impacts to all utilities, especially the possible relocation of DWP and Southern California Edison transmission facilities, will be highly coordinated and performed in such a way that service of those facilities would not be affected.

We hope that you will find this explanation sufficient. If you should have any questions, please contact Garrett Damrath of my staff at (213) 897-9016 or garrett_damrath@dot.ca.gov. Again, thank you for your continued input.

Sincerely,

Ron Kosinski
Deputy District Director
Caltrans, District 7

CC: Thomas A. Dailor, LADWP
Ernesto Chaves, Metro
Rob McCann, LSA Assoc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAR 22 2011

Michael Miles, District Director
California Department of Transportation – District 7
100 South Main Street, Suite 100
Los Angeles, CA 90012

Subject: Follow-up to US EPA August 20, 2010 Feedback on I-710 Corridor Project (I-710 Project) from Ocean Boulevard in the City of Long Beach to State Route 60 (SR-60) in Los Angeles County, California

Dear Mr. Miles:

On August 20, 2010, the US EPA provided comments and recommendations (attachment), in response to a July 8, 2010 Caltrans request for our agency to review various draft documents regarding Purpose and Need, Air Quality and Health Risk Assessment, Environmental Justice, and Alternatives Screening for the I-710 Project. In that letter, we requested that Caltrans: 1) analyze zero-tailpipe-emissions alternatives, including alternatives outside the 710 corridor; 2) share with us, in advance of the publication of the DEIS, the proposed strategy and methodology for the "focused assessment of public health considerations"; and 3) convene a meeting of federal agencies that have a role in permitting, reviewing or approving the project (specifically regarding jurisdictional waters of the United States).

US EPA Region 9 has identified the I-710 Corridor as a geographic priority and has focused significant resources to ensuring and advancing environmental protection within this environmental justice area. We continue to have heightened interest in the I-710 project due to the cumulative current and anticipated future public health impacts to the local community surrounding the I-710 Corridor which currently accommodates tens of thousands of diesel-fueled freight trucks daily through numerous underserved communities near the Ports of Los Angeles and Long Beach.

As stated in our letter, we appreciate the opportunity to work collaboratively with Caltrans and LA Metro on this project and are committed to assisting in the production of a high quality EIS which accurately assesses the potential impacts of the project, measures to reduce those impacts and opportunities to mitigate impacts that cannot be further reduced. To facilitate this collaboration, we request a written response to our letter and would like to meet with Caltrans and LA Metro to discuss EPA's recommendations and comments, specifically:

1. **Zero-Tailpipe-Emissions Alternative.** We support zero-emissions technology for freight movement and urge Caltrans to include in the DEIS an analysis of an alternative that fully incorporates zero-tailpipe-emissions technology as well as an alternative that does not require roadway capacity improvements, and associated increases in air quality and public health impacts, even if these alternatives are outside Caltrans' jurisdiction (in whole or in part).

2. **Health Impacts Assessment (HIA).** We continue to request that Caltrans share with us, in advance of publication of the DEIS, the proposed strategy and methodology for the "focused assessment of public health considerations" that will address the expectations raised by the public and agencies for a robust assessment of health impacts. We recommend that if an HIA is being completed by partner agencies, Caltrans incorporate information produced from that effort into decision-making for the I-710 project.

3. **Interagency Coordination Meeting.** Your July 8, 2010 cover letter to US EPA indicated an interest by Caltrans in implementing the NEPA/404 Merger Agreement. It is still unclear if the NEPA/404 Merger Agreement will be triggered given the uncertainty regarding impacts to the LA River. US EPA recommends that Caltrans coordinate a combined meeting with all federal regulatory agencies that have a role in potentially permitting, reviewing, or approving this project.

As a Participating and Cooperating Agency for the project, we look forward to receiving an update on the project's development and are available to provide additional feedback in advance of publication of the DEIS, including review of an Administrative DEIS, to ensure the DEIS accurately assesses the project's impacts and provides sufficient measures to reduce and mitigate those impacts. Please continue to include us in participating and cooperating agency correspondence and early document review. My staff will contact your staff to coordinate a meeting between the principals.

Sincerely,

Enrique Manzanilla
Director, Communities and Ecosystems Division

Enclosure: August 20, 2010 EPA Response to Caltrans Request for Feedback on I-710 Corridor Project

CC: Walter Waidelich, CA Division Federal Highway Administration
Richard Land, Caltrans Headquarters
Dale Jones, Caltrans Headquarters
Ron Kosinski, Caltrans District 7
Doug Failing, LA Metro
Cynthia Marvin, California Air Resources Board
Geraldine Knatz, Port of Los Angeles

Richard Cameron, Port of Long Beach
Hasan Ikhrata, Southern California Association of Governments
Susan Nakamura, South Coast Air Quality Management District
Carol Gomez, South Coast Air Quality Management District
Dr. Paul Simon, Los Angeles County Department of Public Health
Romel Pascual, City of Los Angeles
Amir Sedadi, City of Los Angeles, Transportation
Michael LoGrande, City of Los Angeles, City Planning
David Castanon, U.S. Army Corps of Engineers
Sally Brown, U.S. Fish and Wildlife Service

I-710 Corridor Project (EA 249900 / PM 5.0/25.0) – SAFETEA-LU Section 6002 Coordination
Comments on Final Purpose and Need Statement and Draft Range of Alternatives

Comment Number	Comment	Response	Responsible Party
LA County Sanitation Districts - Letter Dated August 4, 2010 (comments summarized from original letter)			
LACSD-1	Alternatives - Previous comments submitted by the Districts in correspondence dated September 2, 2009, to your agency, still apply to the subject project.	Comments previously received will be addressed appropriately.	
LACSD-2	Alternatives - Alternatives 5A, 6A, and 6B - The Districts own, operate, and maintain the Long Beach Main Pumping Plant (LBMPP) located west of and adjacent to the I-710, between 16th Street and Gaylord Street. The LBMPP is crucial in the conveyance of wastewater from the cities of Long Beach, Signal Hill, Lakewood and portions of Artesia, Cerritos, and Hawaiian Gardens. Design is underway for the replacement and expansion of this facility, which must stay in operation during construction. Acquisition of adjacent properties is in progress.	The engineering team will take this into consideration during design. **[verifying with URS]**	
LACSD-3	SAFETEA-LU 6002 COORDINATION PLAN Section 1 - On page 1, second entry from bottom of table and on page 3, 7th entry in table, correct Los Angeles County Sanitation Districts' name. Delete the word "Department" and add "Districts" in its place.	The Los Angeles County Sanitation Districts' name has been changed in the Coordination Plan.	
LA County Department of Public Works - Letter Dated August 10, 2010 (comments summarized from original letter)			
LACDPW-1	Public Works concurs with the stated project purpose.	Thank you for your comment.	
LACDPW-2	Public Works concurs with the draft project need.	Thank you for your comment.	
LACDPW-3	Alternatives or significant improvements that would encroach into the Los Angeles River have not been developed in such detail to accurately ascertain the impact to the ecosystem in the river in general, or more specifically to the level of flood protection in the region. Comments will be provided when design alternatives have been further refined.	We look forward to receiving your comments.	
LACDPW-4	The County will hold comments on the Technical Study Methodologies pending review of the South Coast Air Quality Management District's comments.	We look forward to receiving your comments.	
LA County Department of Regional Planning - Letter Dated August 11, 2010 (comments summarized from original letter)			
LACDRP-1	It is appropriate that the remaining alternatives, aside from no build, will include some TSM/TDM, transit, and Intelligent Transportation System improvements.	Note that all of these features are included in all build alternatives.	
LACDRP-2	Among the four alternatives being evaluated in the EIR/EIS, Alternative 6B: I-710 Widening plus Freight Corridor (Zero-Emission Vehicles) is most consistent with policies of the Los Angeles County General Plan to ensure good air quality, efficient freight movement, economic development, and community livability.	Thank you for your comment.	
LACDRP-3	Coordinated with demand management strategies, Alternative 6B has the potential to appreciably reduce GHG as well as criteria pollutants-a step in the right direction of improving air quality and public health for those communities in the I-710 Corridor study area.	Thank you for your comment.	
LACDRP-4	It is good to know that Caltrans will ensure that the project studies and the Draft EIR/EIS will include a focused assessment of public health considerations.	Thank you for your comment.	
Department of Water and Power - Letter Dated August 11, 2010 (comments summarized from original letter)			
DWP-1	While the number of potential tower relocations is an indication of the level of impact, a more direct concern to LADWP is the potential reduction in electrical service that would occur during their relocation. Consequently, we recommended that "Maintain full utilization of the adjacent electric transmission corridor" be incorporated as an objective under the project Purpose and Need. We would appreciate an explanation why this is not applicable as a Project Purpose.	According to Council on Environmental Quality (CEQ) regulations, the purpose and need should be "a clear statement of the objectives that the proposed action is intended to achieve." As stated in the previous response to comments, although the project team recognizes the importance of maintaining utilization of the transmission corridor, this in itself does not constitute an action that the proposed project is trying to achieve. However, the desired objective requested by the Los Angeles Department of Water and Power (LADWP) will be incorporated into the avoidance, minimization and/or mitigation measures. Please also see the California Department of Transportation's (Caltrans)Standard Environmental Reference at http://www.dot.ca.gov/ser/vol1/sec1/ch1fedlaw/chap1.htm for more information on the intent of the Purpose and Need statement.	
DWP-2	One of the enclosures that accompanied your letter, Draft Report for the I-710 Corridor Project Purpose and Need Statement, July 8, 2010, includes only five of the ten objectives that were used to screen alternatives. The objectives must be the same throughout the EIR.	As stated in Section 1.5 of the Final Alternatives Screening Analysis (May 2009), the first five objectives are included in the project's Purpose and Need Statement, while the remaining five were brought forward in preceding Interstate 710 (I-710) studies. All 10 of these objectives were used in the screening analysis to compare the performance of the alternatives and narrow down those alternatives in the initial set which should move forward in the environmental process. However, those measures associated with the project Purpose and Need played a large role in determining the outcome of the screening process.	

I-710 Corridor Project (EA 249900 / PM 5.0/25.0) – SAFETEA-LU Section 6002 Coordination
Comments on Final Purpose and Need Statement and Draft Range of Alternatives

Comment Number	Comment	Response	Responsible Party
DWP-3	The comprehensive utilities analysis and relocation plan should be completed as soon as possible in order to develop mitigation and/or alternatives to minimize the potential impacts, and to disclose this information in the Draft EIR/EIS document.	Information from the comprehensive utilities study will be incorporated into the Draft EIR/EIS.	
United States Fish and Wildlife Service - Letter Dated August 12, 2010 (comments summarized from original letter)			
USFWS-1	While your letter states that comments and suggestions from participating and cooperating agencies on the alternatives were seriously evaluated as a part of this process, we note that your agency did not coordinate with us on the screening criteria or the range of alternatives to be carried forward for further review.	The letter sent July 8, 2010, stated, "Following the **close of public comment for the scoping process**, an alternatives screening analysis was conducted to determine whether any alternatives should be modified or withdrawn from further consideration. Comments and suggestions from participating and cooperating agencies on the alternatives were seriously evaluated as a part of this process." As part of the scoping process, in a letter dated September 29, 2008, the United States Fish and Game Service (USFWS) included a request to consider alternatives that would avoid and/or reduce impacts to listed species, sensitive species, and vegetation types. These are the factors that were seriously evaluated during our screening process.	
USFWS-2	The screening criteria listed in the Final Technical Memorandum - Alternatives Screening Analysis (Metro, 2009) do not address U.S. Fish and Wildlife Service trust resources and concerns, as listed in our comment letter on the Notice of Preparation of a Draft Environmental Impact Report for the subject project, dated September 29, 2008.	Although the Alternatives Screening Analysis did not specifically address USFWS trust resources and concerns, the I-710 project team reviewed basic information related to these resources and concluded they were not a determining factor between alternatives. Therefore, they were not carried forward as a screening measure. However, detailed analysis regarding these resources will occur in the Natural Environment Study (NES) as well as the Biological Assessment (BA) and will also be disclosed in the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). This more detailed information will be considered when selecting a preferred alternative.	
USFWS-3	We request that Caltrans provide us with maps and information on how the alignments will affect USFWS trust resources such as migratory birds, the wetlands in which they live, the federally endangered least Bell's vireo (Vireo bellii pusillus) and, California least tern (Sternula antillarum browni), and the federally threatened western snowy plover (Charadrius alexandrinus nivosus), as well as any suitable remnant habitat for rare and endangered plants such as federally endangered Lyon's pentachaet (Pentachaeta lyonii), salt marsh bird's beak (Cordylanthus maritimus subsp. Maritimus), and Federal candidate Brand's phacelia (P hacelia stellaris).	Maps and information on how the alternatives will affect USFWS trust resources will be provided in the Draft EIR/EIS as well as the final NES.	
USFWS-4	I request that you contact Sally Brown of my staff at your earliest convenience, to schedule a meeting to discuss the screening criteria and range of alternatives for the subject project.	Thank you for your comment. As requested by your agency and the Environmental Protection Act (EPA) on March 22, 2011, a multi-agency meeting will be convened regarding the I-710 Corridor Project.	
U.S. Environmental Protection Agency Letter Dated August 20, 2010 (comments summarized from original letter)			
EPA-1	In order to set the project in the context of various goods movement options in the corridor, please include in the DEIS an alternative that would result in lower emissions and greater air quality and public health benefits, even if that alternative is outside Caltrans jurisdiction (in whole or in part).	Alternative 6B will assume design and usage of the freight movement corridor by zero emission trucks, which will result in greater air quality and public health benefits. This alternative will be fully analyzed in the Draft EIR/EIS.	
EPA-2	Please provide US EPA an opportunity to review and provide feedback on Caltrans strategy to analyze health-related impacts of the 1-710 project.	As a Cooperating Agency and also a member of the Technical Advisory Committee on the I-710 Corridor Project, the EPA has had, and will continue to have the opportunity to work with Caltrans and the other I-710 Funding Partners to provide input in the methodologies used to analyze health-related impacts.	
EPA-3	Please coordinate a combined meeting with all federal regulatory agencies that have a role in potentially permitting, reviewing, or approving this project. Specifically, a meeting with Caltrans, US Army Corps of Engineers and US EPA is warranted given the uncertainty regarding impacts to jurisdictional waters of the United States in the LA River.	It has been determined that a the National Environmental Policy Act (NEPA)/404 process will not be necessary as there will be less than five acres of permanent impacts to waters of the United States (U.S.).	
EPA-4	Purpose and Need Statement Must Not Preclude a Reasonable Range of Alternatives. We stress the need to allow for a reasonable range of alternatives, and thereby continue to recommend that the purpose and need statement be broadened beyond its current stated purposes to allow for a wider range of potential solutions, including alternatives that are more protective of human health and result in fewer air quality impacts.	An Alternatives Screening Analysis was conducted in May 2009 to analyze a reasonable range of alternatives. These alternatives included such elements as Transportation Systems Management/Transportation Demand Management (TSM/TDM) and enhanced goods movement by rail and/or advanced technology and arterial highway and I-710 congestion relief improvements. Although some of the alternatives were eliminated from further analysis, many elements from these alternatives were included in Alternatives 5, 6A, and 6B to be analyzed as part of the Draft EIR/EIS. As stated in Section 1.5 of the Final Alternatives Screening Analysis (May 2009), the first five objectives of the I-710 Corridor Project are included in the project's Purpose and Need Statement, while the remaining five were brought forward in preceding I-710 studies. All 10 of these objectives were used in the screening analysis to compare the performance of the alternatives and narrow down those alternatives in the initial set, which should move forward in the environmental process. The broadness of the purpose and need statement for the I-710 Corridor Project enables the team to include different types of solutions/alternatives but is not too broad as to confuse the ultimate objective of the project within Caltrans' scope and jurisdiction. The I-710 project team	

Comment Number	Comment	Response	Responsible Party
		believes that a reasonable range of alternatives promoting public health and air quality benefits are being analyzed in the Draft EIR/EIS.	
EPA-5	Demonstrate Independent Utility for the Proposed Project Improvement to adjacent and connected facilities will be necessary to absorb the additional traffic volumes that will be induced by volume capacity increases on the 710 and that these improvements are connected actions that should be analyzed within the DEIS for this project.	The I-710 Corridor Project would construct the I-710 mainline to include up to 10 general-purpose (GP) lanes with a potential four-lane freight movement corridor. As discussed previously, the I-710 Corridor within the study area experiences congestion and traffic delays. The I-710 Corridor Project termini are logical, extending from the southern terminus of the I-710 Corridor to its connection to State Route 60 (SR-60). This 18-mile study area is of sufficient length to address environmental matters on a broad scope. The I-710 Corridor Project would result in improvements to the current traffic conditions within the I-710 Corridor even if no additional transportation improvements are made in the area. As such, the I-710 Corridor Project is considered to have independent utility. Potential traffic impacts to connecting routes will be addressed and analyzed in the I-710 Corridor Project Traffic Study. Furthermore, the I-710 Corridor Project would not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.	
EPA-6	Please quantify 1) PM 2.5-related mortality and morbidity, and 2) PM2.5 and air toxics impacts from construction activities.	Particulate matter less than 2.5 microns in diameter ($PM_{2.5}$)-related mortality and morbidity, as well as $PM_{2.5}$ and other air toxics from construction, will be analyzed and discussed in the Air Quality/Health Risk Assessment (AQ/HRA) as well as the Draft EIR/EIS.	
EPA-7	Please update the protocol to address children's health considerations. The health risk assessment should also include the following considerations: 1) Children's exposures and susceptibilities to pollutants of concern; 2) Impacts on childhood asthma; 3) Health and learning impacts of noise near homes and learning centers (schools and daycares); and 4) Impacts that may contribute to environmental factors of obesity.	The South Coast Air Quality Management District (SCAQMD)-recommended multi-pathway factors for Chemicals of Potential Concern (COPC) will be used for calculating the health risks in the HRA. The populations of interest for the I-710 Corridor Project are residential, commercial (i.e., occupational), and sensitive receptors such as schools, child care centers, and convalescent homes. The analysis of COPCs will include analysis of PM which is related to aggravated asthma. Since sensitive receptors such as schools and child care centers are included in the AQ/HRA analyses, impacts to childhood asthma will also be included. Environmental health considerations related to noise such as its effect on schools and learning environments will be included in the I-710 Corridor Noise Study Report and will also be discussed in the Draft EIR/EIS. Chapter 7 of the Community Impact Assessment will discuss impacts that may contribute to environmental factors of obesity.	
EPA-8	Integrate a discussion of Air Quality Impacts with the analysis other project-related impacts. For example, in the context of cumulative impacts, air quality impacts should be discussed with information on other community-scale and individual stressors, such as noise, changes in mobility (e.g. impacting access to healthy foods or healthcare), community cohesion and identity, etc.	The AQ/HRA, as well as the AQ section of the Draft EIR/EIS will discuss cumulative air quality impacts in relation to future-funded and programmed projects within the vicinity. Additionally, Chapter 7 of the Community Impact Assessment will discuss stressors, such as noise, changes in mobility (e.g. impacting access to healthy foods or healthcare), community cohesion, and identity, etc.	
EPA-9	EJ Analysis - Analyze Impacts to Children and the Elderly. We recommend that that an analysis of impacts to children be included in the E1S if there is a possibility of disproportionate impact on children related to the proposed action, as there may be with the proposed project.	Environmental justice impacts to children and the elderly will be analyzed and discussed in Chapter 6 of the Community Impact Assessment.	
EPA-10	EJ Analysis - Consideration of Income. We recommend that the analysis for economic impacts/benefits include minority status in addition to income to assess whether or not areas with a high minority population are being disproportionately impacted by the project, or that project benefits are not only in areas with a low minority population. Also recommend using both income quintiles and poverty status. Additionally, we recommend the high cost of living in California be considered in the methodology.	Economic impacts/benefits for environmental justice communities will be discussed in Chapter 6 of the Community Impact Assessment. Both income quintiles and poverty status will be used in the environmental justice analysis. Income levels will be discussed in the context of the high cost of living in Los Angeles County.	
EPA-11	EJ Analysis - Consideration of Roadway Proximity and Sensitive Receptors. Recommend the work plan include a method for analyzing populations that live within a 500 foot buffer zone of the existing 1-710 roadway, and also a 500 foot buffer zone from the roadway were the proposed project to be completed.	The data being used in the environmental justice analyses correspond to Transportation Analysis Zones (TAZ) used by Southern California Association of Governments (SCAG) and others in travel demand modeling. TAZs are similar to but not the same as census tracts. The study area for the environmental justice analysis contains these TAZs and includes the portion of the I-710 Corridor from Ocean Blvd. in Long Beach to SR-60, a distance of approximately 18 miles. At the freeway-to-freeway interchanges, the study area extends one mile east and west of the I-710 mainline for the Interstate 405 (I-405), State Route 91 (SR-91), Interstate 105 (I-105), and Interstate 5 (I-5) interchanges. This study area adequately covers a 500-foot buffer zone for all areas where the proposed project is to be completed.	
EPA-12	EJ Analysis - Consideration of Non-Chemical Stressors. We commend Caltrans for proposing to analyze the 12 specific areas delineated, as doing so will help inform the separate environmental justice impacts of this project. We also recommend that the cumulative impacts be considered in this analysis. The work plan should identify a method for identifying which of these areas have disproportionate impacts.	Consideration of non-chemical stressors such as noise and poverty will be discussed in the environmental justice analysis as part of the Community Impact Assessment.	

I-710 Corridor Project (EA 249900 / PM 5.0/25.0) – SAFETEA-LU Section 6002 Coordination
Comments on Final Purpose and Need Statement and Draft Range of Alternatives

Comment Number	Comment	Response	Responsible Party
EPA-13	Alternatives Screening Analysis - The document is dated May 29, 2009, but was provided to EPA with a request for our comment and review on July 8, 2010. Given that over a year has passed since this document was finalized, we are concerned that Caltrans is seeking EP A review and comment on this particular document too late for any incorporation of meaningful feedback from our agency related to the range of alternatives and we are concerned that Caltrans does not intend to be responsive to feedback from our agency since so much time has passed since this document was finalized Please provide the most up-to-date information to US EPA so that we can provide meaningful feedback.	Meaningful input has been received from EPA throughout the life of this project, especially the AQ/HRA protocol. Additionally, we have considered EPA's feedback in assessing the inclusion of other alternatives. At this time, the I-710 Corridor Project team is considering an additional tolling alternative which will be vetted through the public participation process as well as through the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) 6002 process **[Caltrans – let's discuss what more we want to do with the SAFETEA-LU process]**.	
EPA-14	Alternatives Screening Analysis - Address Potentially Environmentally Superior Alternatives (Occurring in-Whole or in Part) on Parallel Corridors in the DEIS. We strongly recommend including an analysis of freight movement along the entire regional corridor to inform the alternative proposed for analysis in the DEIS.	A Goods Movement Study (February 2009, http://www.metro.net/projects/i710_corridor/710_news_info/) was completed providing a comprehensive analysis of goods movement in the region where parallel corridors were considered. Based on the Goods Movement Study, the Alameda Corridor is assumed to reach its capacity by the I-710 Corridor Project build year of 2035. Therefore, this parallel route was not considered as an alternative option to those being analyzed in the Draft EIR/EIS. However, Caltrans, Metro and the other I-710 Funding Partners (including the Ports of Los Angeles and Long Beach) continue to focus on the I-710 Corridor given its integral role for goods movement in southern California.	
EPA-15	Alternatives Screening Analysis - Include Regional Outcomes as a Criteria in Alternatives Screening Analysis. Strongly suggest including regional Vehicle Miles Traveled (VMT) or Vehicle Hours Traveled (VHT) in the alternatives screening analysis. We also note the absence of any direct consideration of Greenhouse Gas emissions (GHGs) as part of the screening of alternatives. Because the project will affect regional traffic patterns, an analysis of greenhouse gas emissions should be undertaken at the regional level.	Regional VMT and/or VHT were not used in the Alternatives Screening Analysis as it was concluded to not be a determining factor between alternatives. Although GHGs were not directly called out in the Alternatives Screening Analysis, GHGs (in particular, carbon dioxide [CO_2]) follow an emission vs. speed curve pattern similar to oxides of nitrogen (NO_x), so it is expected that the differences amongst the alternatives would be relatively similar for GHGs as those for NO_x were considered as part of the screening of alternatives. Additionally, an analysis of GHG emissions will be undertaken at the regional level in both the AQ/HRA as well as the Draft EIR/EIS.	
EPA-16	Alternatives Screening Analysis - Include an Analysis of an Existing, Proven Zero-Emissions Vehicle Technology in the Alternatives Screening Analysis. Without a clear definition of the technology, analysis of impacts to public health and the environment under NEPA will be problematic. Also, if the technology will be phased in over time, it is necessary to include a time line incorporating those benefits so that adverse impacts in the shorter term can be assessed. We also recommend that Caltrans analyze other, proven zero emissions vehicle technology within the existing 1-710 right of way, as well as along parallel corridors.	Although a specific zero-emissions technology was not analyzed in the Alternatives Screening Report, a stand-alone zero-emissions alternative was. For the purpose of the screening analysis, it was assumed that the advanced technology was a fixed guideway technology family (e.g., electric-powered magnetic levitation or linear-induction motor system). This assumption provided the full range of the potential benefits and costs of the different zero emissions technologies and design options. It was found that this alternative alone does not meet the purpose and need of the proposed project and was eliminated from further analysis. However, Alternative 6B includes this zero-emissions technology element and will be analyzed in the Draft EIR/EIS. Metro and Caltrans are working actively with CALSTART, a non-profit organization promoting clean goods movement technology, and the Ports of Los Angeles and Long Beach to define zero-emissions technologies.	
EPA-17	Alternatives Screening Analysis - Include an Analysis of Additional TDM Measures in the Alternatives Screening Analysis. We also recommend Caltrans analyze an array of tolling alternatives on the corridor, and study combinations of freight and passenger vehicle tolling.	TDM measures including transit, policy and ITS applications were analyzed in the Alternatives Screening Analysis. It was found that these measures did not meet the purpose and need as a stand alone alternative. However, TDM elements are included in all the Build Alternatives for the I-710 Corridor Study and will be fully analyzed in the Draft EIR/EIS. Metro, Gateway Cities Council of Governments, and the other I-710 Funding Partners allow for coordinated consideration and development of other TDM measures with the Ports of Los Angeles and Long Beach. In addition, TSM measures such as rideshare services, restriping of arterials, addition and expansion of park-and-ride facilities, and enhancement/expansion/coordination of pedestrian, bicycle and transit information and amenities, are programmed in the SCAG's 2008 Regional Transportation Plan. The I-710 Project Team has decided to analyze a tolling alternative in the Draft EIR/EIS and associated technical reports.	
EPA-18	Alternatives Screening Analysis - Consider Environmental Justice Factors in Methodology for Project Alternatives Screening. Because an EJ population essentially surrounds the 710, EJ impacts could be expected to vary with the local environmental effects of the project--air pollution, noise, etc. These impacts do vary between the alternatives, as described in the results of the initial analysis performed to screen alternatives; therefore the EJ impact will vary between the alternatives.	Ensuring environmental justice in the I-710 Corridor communities is part of the 10 goals of the I-710 Corridor Project. Since these goals were taken into consideration in the Alternatives Screening Analysis, environmental justice was thus taken into consideration when choosing which alternatives would be carried forward for analysis in the Draft EIR/EIS and associated technical reports. As a result, impacts to environmental justice communities will be assessed for each alternative and disclosed in the Draft EIR/EIS to aid in the decision-making process.	

I-710 Corridor Project (EA 249900 / PM 5.0/25.0) – SAFETEA-LU Section 6002 Coordination
Comments on Final Purpose and Need Statement and Draft Range of Alternatives

Comment Number	Comment	Response	Responsible Party
LA County Fire Department - Letter Dated August 24, 2010 (comments summarized from original letter)			
PLANNING DIVISION:			
LACFD-PD-1	We have no comments at this time.	Comment noted.	
LAND DEVELOPMENT UNIT:			
LACFD-LD-1	The development of this project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows and fire hydrants.	The I-710 Corridor Project will comply with all applicable code and ordinance requirements for construction, access, water main, fire flows and fire hydrants.	
LACFD-LD-2	When a bridge is required to be used as part of a fire access road, it shall be constructed and maintained in accordance with nationally recognized standards and designed for a live load sufficient to carry a minimum of 75,000 pounds. All water-crossing designs are required to be approved by the public works department prior to installation.	If a bridge is required to be used as part of a fire access road as part of the I-710 Corridor Project, it will be constructed and maintained in accordance with nationally recognized standards and designed for a live load sufficient to carry a minimum of 75,000 pounds. All water-crossing designs will be submitted for approval to the public works department prior to installation.	
LACFD-LD-3	The maximum allowable grade shall not exceed 15% except where topography makes it impractical to keep within such grade; in such cases, an absolute maximum of 20% will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topographical difficulties, should be no more than 17%. Grade breaks shall not exceed 10% in 10 feet.	The maximum allowable grade will not exceed 15 percent except where topography makes it impractical to keep within such grade; in such cases, an absolute maximum of 20 percent will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topographical difficulties, will be no more than 17 percent. Grade breaks shall not exceed 10 percent in 10 feet. **[Verifying with URS?]**	
LACFD-LD-4	All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.	All access devices and gates will comply with California Code of Regulations (CCR), Title 19, Articles 3.05 and 3.16.	
LACFD-LD-5	All access devices and gates shall meet the following requirements: A) any single gated opening used for ingress and egress shall be a minimum of 26 feet in width, clear-to-sky; B) any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky; C) gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way, and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used; the 50 feet shall be measured from the right-of-way to the intercom control device; D) all limited access devices shall be of a type approved by the Fire Department; and E) gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.	All access devices and gates will meet the requirements outlined in your comment.	
LACFD-LD-6	All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review, prior to implementation.	All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) will be submitted to the Fire Department for review, prior to implementation.	
LACFD-LD-7	Provide three sets of alternate route (detour) plans, with a tentative schedule of planned closures, prior to the beginning of construction. Complete architectural/structural plans are not necessary.	Three sets of alternate route (detour) plans, with a tentative schedule of planned closures, will be provided prior to the beginning of construction.	
LACFD-LD-8	Notify the County of Los Angeles Fire Department, Battalion Headquarters Fire Stations, Batallion 3,7 ,9, and 13 that respond to areas within construction zones, at least three days in advance of any street closures that may affect fire/paramedic responses in the area.	The County of Los Angeles Fire Department, Battalion Headquarters Fire Stations, Batallions 3, 7, 9, and 13 that respond to areas within construction zones, will be notified at least 3 days in advance of any street closures that may affect fire/paramedic responses in the area.	
LACFD-LD-9	Temporary bridges shall be designed, constructed, and maintained to support a live load of at least 70,000 pounds. A minimum vertical clearance of 13'6" will be required throughout construction.	Temporary bridges will be designed, constructed, and maintained to support a live load of at least 70,000 pounds. A minimum vertical clearance of 13 ft, 6 inches (in) will be maintained throughout construction.	
LACFD-LD-10	Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.	Disruptions to water service will be coordinated with the County of Los Angeles Fire Department and alternate water sources will be provided for fire protection during such disruptions.	
LACFD-LD-11	The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los	Thank you for your participation.	

Comment Number	Comment	Response	Responsible Party
	Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.		
LACFD-LD-12	Submit proposals for all street vacations (closures) to the County of Los Angeles Fire Department, Land Development Unit for review and approval. The proposal shall be submitted through the Department of Public Works.	Proposals for all street vacations (closures) to the County of Los Angeles Fire Department, Land Development Unit, will be submitted for review and approval. The proposal will be submitted through the Department of Public Works.	
FORESTRY DIVISION - OTHER ENVIRONMENTAL CONCERNS:			
LACFD-FD-1	The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Final Environmental Document.	Erosion control will be discussed in Section 3.10, Geology. Rare and Endangered Species/vegetation and the County Oak Tree Ordinance will be discussed in Sections 3.16 to 3.20, Biological Resources. Fuel Modification for Very High Fire Hazard Severity, Zone 4, will be discussed, if applicable. Archaeological and cultural resources will be discussed in Section 3.7, Cultural Resources.	
HEALTH HAZARDOUS MATERIALS DIVISION:			
LACFD-HHMD-1	Health Hazardous Materials Division has no objection to the proposed project.	Thank you for your comment.	
U.S. Army Corps of Engineers (ACOE) Letter Dated September 13, 2010 (comments summarized from original letter)			
ACOE-1	Recommend inclusion of a paragraph in the Introduction section of the EIS explaining the role of ACOE as a Cooperating Agency in the NEPA process and their intent to rely on the I-710 Corridor Project EIS for their future federal actions.	Clarifying paragraph will be added to the EIS as recommended.	LSA
ACOE-2	Previous comments submitted on Purpose and Need on September 16, 2009 not addressed. Specific comments are: - Needs should be provided in terms of quantified deficiencies as compared to relevant standards or goals.	The supporting text for the five defined Project Need statements will be enhanced as described below to reflect the basis upon which they have been quantified for evaluation in the technical reports and DEIR/EIS. **Air Quality and Public Health** – Existing and future no build air quality conditions will be quantified. Existing health risk will be quantified based upon published data. **Traffic Safety** – Traffic accident data will be quantified. **Design Deficiencies** – The I-710 freeway was designed and constructed over 50 years ago. There is a need to modernize the design to accommodate the types of vehicles using I-710 today. **Future Traffic Volumes (2035)** – Existing and future no build traffic conditions will be quantified and expressed in terms of level of service. **Growth in Population, Employment, and Economic Activities Related to Goods Movement** - Existing and future no build traffic conditions will be quantified and expressed in terms of level of service for truck traffic serving the Ports, railyards, and intermodal facilities in the study area.	URS
ACOE-3	The Project objectives are not clearly related to the articulated Project Purpose. Specific comments are: - Concern that inclusion of an objective to address design deficiencies eliminates any alternatives that would not modify I-710, and thus may narrow the range of alternatives impermissibly. - Clarification is requested on why correction of design deficiencies is essential to the Project purpose.	Either provide clarification as requested to clearly state why correction of design deficiencies is essential to the project purpose, or consider combining objectives for traffic safety and modernizing the I-710 design.	URS/Caltrans/Metro
ACOE-4	The Project purpose and need statements do not support the screening criteria. The alternatives screening analysis employs quantitative standards without an explanation of the relationship to purpose and need.	The Alternatives Screening Report is (May 2009) complete and has been accepted as final by the I-710 Corridor Project Committee. Suggest that this document be updated for purposes of 6002 Coordination to address the United States Army Corps of Engineers' (ACOE) request for clarifying how the quantitative analysis provided in the screening analysis relates to the Project purpose and need.	URS/LSA
ACOE-5	ACOE is particularly concerned that Section 408 considerations are not taken into account in the purpose and need, and range of alternatives. Specific comments include: - Request that ACOE mission of providing flood control be included as a constraint in meeting the need. - In addition to linear feet of impacts to the Los Angeles River, provide information on the amount, type, purpose, or severity of proposed modifications to the channel system associated with the various alternatives.	Similar to the response to ACOE-4, suggest that the alternatives screening report be updated for purposes of 6002 Coordination to address ACOE's request to incorporate Section 408 considerations in defining the range of alternatives.	URS

I-710 Corridor Project (EA 249900 / PM 5.0/25.0) – SAFETEA-LU Section 6002 Coordination
Comments on Final Purpose and Need Statement and Draft Range of Alternatives

Comment Number	Comment	Response	Responsible Party
ACOE-6	The purpose and need statement must not preclude a reasonable range of alternatives. ACOE is concerned that not all reasonable alternatives have been considered such as double decking the freeway or increasing rail capacity.	Similar to the response to ACOE-4, suggest that the alternatives screening report be updated for purposes of 6002 Coordination to discuss previous evaluation of other alternatives considered in the Major Corridor Study (was double decking specifically evaluated) and to better clarify the role of expanded rail capacity per the Goods Movement Study.	URS/Metro/COG?
ACOE-7	ACOE recommends that the alternatives analysis be expanded to consider alternatives consistent with the Section 404 (b)(1) Guidelines, including a 404 No Action Alternative (i.e., one that does not require a Section 404 permit), geographic alternatives (change in location) and functional alternatives (project substitutes and design modifications).	Similar to the response to ACOE-4, suggest that the alternatives screening report be updated for purposes of 6002 Coordination to discuss previous evaluation of other geographic alternatives considered in the Major Corridor Study. A 404 No Action alternative can also be added, but need to make clear that this would not be a fully engineered and evaluated alternative in the technical studies, EIR/EIS, or Section 404(b)(1) Alternatives Analysis.	URS/LSA
ACOE-8	Provide the Corps with construction emissions data related to our federal actions. Specific requests are to: - provide data on direct and indirect emissions in tons per year for criteria pollutants and precursors related to construction occurring in ACOE jurisdiction.	Since the project as a whole is considered within ACOE jurisdiction, the quantification of construction emissions will be provided in the EIR/EIS consistent with the I-710 Corridor Project AQ/HRA Protocol.	LSA/ENVIRON
ACOE-9	Request for a combined meeting with all Federal regulatory agencies that have a role in potentially permitting, reviewing, or approving the project. Specific request to initiate the formal checkpoint meetings specified in the 2006 NEPA/404 Integration MOU (Checkpoint 1: Purpose & Need; Checkpoint 2: Range of Alternatives; and, Checkpoint 3: Determination of a Least Environmentally Damaging Practicable Alternative).	Caltrans, in cooperation with Metro and the I-710 Funding Partner agencies, will initiate interagency coordination meetings as needed. However, based upon the analyses conducted to date, it is clear that the impacts of the project are well below the 5 acre permanent impact threshold for applying the NEPA/404 Integration Process; therefore, any such coordination will be conducted pursuant to the requirements of SAFETEA-LU Section 6002 and not the 2006 NEPA/404 Integration Memorandum of Understanding (MOU).	LSA/Caltrans
U.S. Environmental Protection Agency (EPA) Letter Dated March 22, 2011			
EPA-1	Zero-Tailpipe-Emissions Alternative. We support zero-emissions technology for freight movement and urge Caltrans to include in the DEIS an analysis of an alternative that fully incorporates zero-tailpipe-emissions technology as well as an alternative that does not require roadway capacity improvements, and associated increases in air quality and public health impacts, even if these alternatives are outside Caltrans' jurisdiction (in while or in part).	Alternative 6B includes a zero-tailpipe-emissions technology element and will be analyzed in the Draft EIR/EIS. Although the build alternatives require roadway capacity improvements, they are necessary to meet the anticipated travel demand expected to occur by the project design year of 2035. Alternatives 6A and 6B are projected to provide better traffic levels of service (LOS), thereby minimizing the effect of traffic congestion and benefiting air quality and public health.	
EPA-2	Health Impacts Assessment (HIA). We continue to request that Caltrans share with us, in advance of publication of the DEIS, the proposed strategy and methodology for the "focused assessment of public health considerations" that will address the expectations raised by the public and agencies for a robust assessment of health impacts. We recommend that if an HIA is being completed by partner agencies, Caltrans incorporate information produced from that effort into decision-making for the I-710 project.	Caltrans is committed to fully reviewing the Health Impact Assessment (HIA) being prepared as part of the Gateway Cities Council of Governments' Air Quality Action Plan. Caltrans will review the HIA and may include appropriate information from the HIA into the Draft EIR/EIS.	
EPA-3	Interagency Coordination Meeting. Your July 8, 2010 cover letter to US EPA indicated an interest by Caltrans in implementing the NEPA/404 Merger Agreement. It is still unclear if the NEPA/404 Merger Agreement will be triggered given the uncertainty regarding impacts to the LA River. US EPA recommends that Caltrans coordinate a combined meeting with all federal regulatory agencies that have a role in potentially permitting, reviewing, or approving this project.	We apologize for the delay in a response to your letter; however, there have been a number of changes to design and the project team wanted to ensure an accurate response before responding to the EPA and other agencies. At this point, we are reasonably certain that the 5-acre permanent impact threshold for triggering the NEPA/404 MOU will not be met. However, per your suggestion, Caltrans will coordinate a combined meeting with all federal regulatory agencies that have a role in potentially permitting, reviewing, or approving this project.	

Jayna Harris

Subject:	I-710 Corridor Project - SAFETEA-LU 6002 Agency Meeting
Location:	Caltrans District 7 - Room 1.040B
Start:	Tue 6/28/2011 10:30 AM
End:	Tue 6/28/2011 12:00 PM
Recurrence:	(none)
Meeting Status:	Meeting organizer
Required Attendees:	plenys.thomas@epa.gov; Phillip.j.serpa@usace.army.mil; Phuong.h.trinh@usace.army.mil; Christopher.M.Moore@noaa.gov; oepcsfn@aol.com; Chaves, Ernesto; law@scag.ca.gov; lhempe@lynwood.ca.us; 'ron_kosinski@dot.ca.gov'; Rob McCann; Dave Levinsohn; Jack Waldron; Allison Morrow; Garrett Damrath; Sally_Brown@fws.gov; Chris_lehnertz@nps.gov; Ronald.nichols@ladpw.com; rbruckner@planning.lacounty.gov; smaguin@lacsd.org; brunop@scrra.net; JYANG@dpw.lacounty.gov; psimon@ph.lacounty.gov; John.todd@fire.lacounty.gov; rtorrez@lynwood.ca.us; swithers@lynwood.ca.us; kwilson@ci.vernon.ca.us; Arthur.goodwin@acta.org

You are receiving this email because you are a coordinating or participating agency under SAFETEA-LU Section 6002 for the I-710 Corridor Project. Section 6002 of SAFETEA-LU facilitates efficient environmental document review by mandating a cooperating and participating agency coordination structure. At this time we are inviting all participating and cooperating agencies to a meeting in which we will update you on the project description as well as address your comments and concerns regarding alternatives analysis/range of alternatives, purpose and need, and technical study methodologies, all of which we circulated for their review late last year. Attached is a draft meeting agenda as well as the a response to comments matrix. Please look over the response to comments matrix in preparation for this meeting.

Also, if you need a parking spot, please call Allison Morrow at Caltrans District 7 (213) 897-3247 by Friday June 24, 2011. If you can't make it, but can participate via conference call, let me know and a call in number can be provided.

If you have any questions, please feel free to give me a call at (949) 553-0666.

Thank you,

Jayna Harris

6002 coordination meeting June...

Responses to ɔmments_FINAL.do.

SAFETEA-LU 6002 Agency Coordination Meeting

June 28, 2011
10:30 a.m. – 12:00 pm
Caltrans District 7

DRAFT MEETING SUMMARY

ATTENDEES

In attendance - see attached sign in sheet.

Via conference call:

Bill Romo – Los Angeles County Fire Department (LACFD)

Sally Brown – United States Fish and Wildlife Service (USFWS)

Jennifer Cohen – Metrolink

Susan Sturges – United States Environmental Protection Agency (EPA)

Phil Serpa – United States Army Corps of Engineers (ACOE)

Alison Linder – Southern California Association of Governments (SCAG)

INTRODUCTIONS AND MEETING OVERVIEW

- Ron Kosinski (Caltrans) described the SAFETEA-LU 6002 process and stated that the purpose of the coordination meeting is to reestablish communications with the cooperating and participating agencies by updating them on the status of the project.

PROJECT UPDATE

- Purpose and Need
  - Rob McCann (LSA) reviewed the purpose and need statement highlighting the statement that growth in population, employment and activities related to goods movements is included, along with goals to improve safety, mobility, and modernize the freeway design.
  - Rob McCann also noted that there is a high level of concern regarding the level of health risk due to the diesel truck emissions in the I-710 Corridor; therefore

one of the unique elements of the project purpose is to improve air quality and public health.

- Alternatives Review
  - Rob McCann reviewed the alternatives refresher power point provided.
  - Metro and the Gateway Cities Council of Governments (GCCOG) are involved with CalStart (a non-profit corporation involved in the development of zero emission truck technologies) to coordinate the development of zero emission technologies and to assess the viability of future implementation of these technologies in the I-710 Corridor.
  - The automated guidance technology included in Alternative 6B was described. Automated guidance provides for platoons of vehicles, (tightly spaced groups of 6 to 8 trucks) that have the potential to accommodate more vehicles than non-automated driving, thus increasing capacity without adding more pavement.
  - The new Alternative 6C was described and it was explained that this was an alternative added since the last distribution of information to the Cooperating and Participating agencies. Alternative 6C is a tolling alternative that has been included to allow for the option of Public Private Partnership (P3) opportunities.
  - Rob McCann also stated that several geometric refinements to the alternatives have occurred, partially as a result of the updated freight corridor capacities and connections to the railyards. Other factors included arterial improvements as well as the relocation of affected utilities.
  - Ron Kosinski noted that these numerous changes was why Caltrans appeared to be slow in responding to comments received in August 2010 from the cooperating and participating agencies on the alternatives.
- Schedule
  - Completion of Technical Studies – Late 2011
  - Second Administrative Draft EIR/EIS – November 2011
  - Circulation of the Draft EIR/EIS – end of February 2012
- Discussion
  - Susan Sturges (EPA) asked if Alternative 6C provides an opportunity for conventional trucks or does it provide for the mixing of conventional and zero-emission trucks. She also asked if perhaps there would be a reduced toll for zero-emission vehicles to use the freight corridor.
    - Rob McCann stated that for Alternative 6C, the modeling assumed that vehicles would be conventional trucks. The traffic forecast data showed that there is expected to be some diversion of traffic from a tolled freight corridor scenario.
    - Jerry Wood (GCCOG) added that the tolling could apply to either Alternatives 6A or 6B.
  - Sally Brown (USFWS) stated that her main concern is the effect of the project on migratory birds and wetlands due to the fact that there are 15,000 migratory birds within this portion of the Los Angeles River and the elevated freight corridor may cause an obstruction for these birds. She also stated that she has concern for migratory birds and the potential danger to them from an electrified overhead catenary system. This needs to be addressed in the EIR/EIS and technical studies.

- Sally Brown asked why rail alternatives were eliminated from consideration.
  - Rob McCann stated that previously, GCCOG, with Metro and Caltrans prepared the Major Corridor Study that looked at a full range of alternatives for the I-710 Corridor. From this, Alternative 3 – maximum goods movement by rail was included in the screening for the I-710 Corridor Project. This alternative looked at area rail infrastructure and assessed all options, including the Alameda Corridor. Forecasts completed for the I-710 Corridor Project include full utilization of goods movement by rail in the SCAG region.
    - Jerry Wood further added that whatever freight is left over and not able to be carried by rail will be moved by truck.
  - Ron Kosinski stated that Caltrans, LSA biological resources staff and USFWS will have a separate meeting to discuss USFWS comments and concerns.

- SAFETEA-LU 6002 Process to Date
  - April 2008 – initiated coordination
  - June 2009 – draft purpose and need statement
  - July 2010 - updated purpose and need (along with a response to comments matrix), range of alternatives and technical studies methodologies.
    - Subsequent to this letter, comments were received from various cooperating and participating agencies.
  - Ron Kosinski stated that at this time, Caltrans recommends holding separate follow up meetings to discuss the comments received on the July 2010 submittal.
    - Follow up meetings were requested by:
      - EPA – questions regarding the Health Impact Assessment and how it will be included into the I-710 Corridor Project EIR/EIS.
      - USFWS – concerns regarding impacts to the Los Angeles River hydrology and effects of elevated structures on migratory birds.
      - ACOE – requesting more detailed information regarding project design and specific impacts similar to the previous reports submitted by the engineering team.
    - Jerry Wood stated that the agencies will be made aware of the technical studies summary presentations that will be made to the various I-710 committees. Jerry then suggested that after these meetings, a more detailed follow up meeting with the agencies listed above can be conducted in August/September.

- NEPA/404 Integration Process
  - Permanent impacts of the I-710 Corridor Project on Waters of the United States are anticipated to be well below the five acre threshold (most likely around two acres). At some locations where existing bridges over the Los Angeles River, the proposed project would lessen the impact of existing fill due to more efficient bridge design.
    - Stephanie Hall (ACOE) stated that the five acre threshold is not the only factor involved in determining if the NEPA/404 process needs to be conducted. However, she stated that she does not anticipate this project needing to go through the NEPA/404 Integration Process.

- Conclusion
  - More focused meetings will be scheduled with EPA, ACOE and USFWS in August/September.
  - Susan Sturges (EPA) asked whether or not the Second Administrative Draft EIR/EIS will be available for the Cooperating Agencies to review.
    - Ron Kosinski stated that Caltrans is still trying to define what level of information will be disclosed to the Cooperating Agencies and that due to the potential for litigation on this project, this issue needs to be discussed with Caltrans legal counsel.

ACTION ITEMS

	Task	Assigned To
1	Caltrans to schedule focused meeting with EPA, ACOE and USFWS to discuss agency comments received in August 2010 and to review plans and technical study findings.	Caltrans (Garrett Damrath/Paul Caron)
2	Caltrans to report back on its ability to provide the Second Administrative Draft EIR/EIS (or relevant portions thereof) to Cooperating Agencies for review.	Caltrans (Ron Kosinski)
3	Metro to schedule meeting with ACOE to review updated engineering plans and reports related to the Los Angeles River (may be combined with the meeting in Action Item No. 1).	Metro (Ernesto Chaves)