

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

<p>Section III - Prioritize Public Health and Eliminate Projects that May Cause More Harm Than Good. The Draft CMIP lacks specificity regarding the health, air quality, and climate implications of proposed projects, raising concerns about its ability to prioritize community well-being. most of the proposed projects, the possible health and air quality implications are marked as “N/A” in many cases; we are left feeling like our continuous calls for prioritizing community health remain unheard. Recent EPA changes to air quality standards underscore the need for more stringent strategies to improve air quality, especially in areas like the Corridor with high levels of pollution.</p>	<p>It is not feasible to evaluate air quality or health impacts at the project level as part of the Investment Plan, which is a strategic planning document. Metro does not have the level of detail required to perform the analysis at this stage; projects will undergo and need to meet CEQA/NEPA requirements as they move towards implementation. CMIP Section 8.5 clarifies how social determinants of health inform the current recommendations and how community programs will continue to advance health equity. CMIP Section 9.3 clarifies that all projects will be screened to determine whether an Air Quality analysis would be required as part of the CEQA/NEPA process. As part of the CEQA/NEPA process, a project's potential health risk impacts would also be evaluated during construction and operation, which may include a quantitative Health Risk Assessment, depending on a project's location, construction duration, construction activities, potential sources of emissions and proximity to receptors.</p>
<p>Section III - Prioritize Public Health and Eliminate Projects that May Cause More Harm Than Good. Of the twenty-seven criteria used to evaluate health-related project outcomes (see Table A), only four criteria (AQ1, CH1, CON5, CON9) directly advance transparency on the implications to air quality and health. Furthermore, data on these four criteria is extremely limited, if at all available, for the vast majority of the projects and programs recommended for initial investment, with many receiving N/A simply because there is no data currently available (see Table B)</p>	<p>See the methodology rubric for why those projects have "NA" for emissions benefits and impacts - they were not modeled.</p>

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

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

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

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

Section VIII - Zero Emissions and Public Safety Strategies

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

Added to fact sheets and ZET section of CMIP:

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

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

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

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

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

Updated Fact Sheet:

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

Section VIII - Zero Emissions and Public Safety Strategies

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

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

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- Community Advocacy and Education: Metro aims to serve as a community advocate in ZE Truck (ZET) technology policy discussions, ensuring community concerns are addressed, supporting research, and facilitating educational initiatives on ZE technologies.
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Section VIII - Zero Emissions and Public Safety Strategies

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

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

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

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

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

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

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

Rewrote the project factsheet [LB-ELA_0217] slightly: *Work with the Alameda Corridor Transportation Authority (ACTA) along with the railroads (Union Pacific (UP) and Burlington Northern Santa Fe (BNSF)) to continue to develop and test*

Section IX. Goods Movement. Preference for Electrification of Underutilized Infrastructure: Instead of funding private projects, CEHAJ advocates for prioritizing electrification of the Alameda Corridor, which is seen as underutilized. The section argues that such investments would provide more immediate and tangible benefits to communities compared to funding industry-led pilot projects.

Prioritization for ZE technology will be electrification, with an assessment of other technologies including potential community impacts and benefits as requested. The funding sources listed as alternate funding sources are meant to leverage the \$10 million allocation. Any funding that is not ultimately used for this effort will return to the Goods Movement modal program. Freight/goods movement projects included in the Investment Plan are those that minimize negative environmental impacts, modernize technology, and upgrade infrastructure. The List of Projects Recommended for Initial Investment includes ZE truck infrastructure and a study of freight rail electrification projects/programs.