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April 7, 2024

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

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

Dear Mr. Dóñez:

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

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

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

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

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

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

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

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

Community Programs:

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

Comprehensive Analysis of ZE tailpipe technologies:

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

Robust and Meaningful Community Engagement

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

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

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

If you have any questions or concerns, please reach out to me at canom@metro.net.

With great appreciation,

Michael Cano

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

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