February – July 2014

• East Yards Communities for Environmental Justice (EYCEJ) – 2 meetings
• Coalition for Environmental Health and Justice (CEHAJ) – 1 meeting
• Coalition for Clean Air – 2 meetings
• Legal Aid Foundation of Los Angeles – 1 meeting
• Southern California Edison (SCE) – 2 meetings
City and Agency Briefings

February – July 2014

- AQMD
- City of Bell
- City of Carson
- City of Commerce
- City of Downey
- City of Long Beach
- City of Maywood
- City of Paramount
- City of Signal Hill

- City of South Gate
- City of Vernon
- County of Los Angeles
- Port of Long Beach
- Port of Long Beach Harbor Commission
- Port of Los Angeles
<table>
<thead>
<tr>
<th>Meeting Date</th>
<th>Discussion Items</th>
</tr>
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<tbody>
<tr>
<td>February 20, 2014</td>
<td>• Initial Traffic Forecasts: Alternative 5C and Alternative 7</td>
</tr>
<tr>
<td>February 25, 2014</td>
<td>• <strong>In depth review of I-710 Traffic Forecasts</strong></td>
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<tr>
<td>Workshop</td>
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<tr>
<td>March 20, 2014</td>
<td>• Review of Geometric Concept Plans</td>
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<td>• Zero Emissions Vehicles Commercialization Process</td>
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<td>• Strategic Transportation Plan: Active Transportation Elements and Traffic Forecasts</td>
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<tr>
<td>April 17, 2014</td>
<td>• Alternative Refinements and Programmatic Elements</td>
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<td>• Initial Recommendations</td>
</tr>
<tr>
<td>June 19, 2014</td>
<td>• Overview of Initial Recommendations of Alternatives for Consideration in the RDEIR/SDIES</td>
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<tr>
<td></td>
<td>• CAC Recommendation No. 1 regarding CA-7</td>
</tr>
<tr>
<td>July 17, 2014</td>
<td>• <strong>Elements of CA-7 Included/ Not Included in RDEIR/SDEIS</strong></td>
</tr>
<tr>
<td>Workshop</td>
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<tr>
<td>July 17, 2014</td>
<td>• CAC Recommendation No. 2 regarding Alternative 5C and Alternative 7</td>
</tr>
</tbody>
</table>
New Appointments

- CAC Appointees
- Long Beach Oversight Committee Appointees
Alternative Comparison Summary
Community Alternative 7 – Main Sections

- CA7.1 General Purpose Lanes
- CA7.2 Public Transit
- CA7.3 Zero Emissions Freight Corridor
- CA7.4 Public Private Partnership (PPP)
- CA7.5 River Improvements
- CA7.6 Pedestrian and Bicycle Elements
- CA7.7 Community Benefits
- CC7 Construction Phase Elements
Summary Comparison

- Alternative Comparison Summary Table Highlights

Key Differences Among Community Alternative 7 (CA-7), Alternative 5C, and Alternative 7

- Community Alternative 7
  - Maintains current configuration (number of lanes) but includes fewer freeway improvements.
  - Modernizes the design and improves arterial interchanges to enhance safety without removing existing structures.

- Alternative 7
  - Maximum of 6 general purpose lanes.
  - Freeway configurations don't preclude future general purpose lane additions with minimization of property impacts.
  - Modernizes the design of arterial and freeway/interchange with minimization of property impacts.

- Alternative 5C
  - Maximum of 10 general purpose lanes with minimization of property impacts.
  - Modernizes the design of arterial and freeway/interchange with minimization of property impacts.

- CAT 1: General Purpose Lanes
  - Includes an aggressive strategy to improve public transit via rail and bus in the 710 Corridor.
  - Includes substantial investments in public transit in the project area and implements a corridor-wide, comprehensive transit capacity enhancement.

- CAT 2: Public Transit
  - Includes significant increase in light rail and bus transit services in the 710 Corridor.

- CAT 3: Zero Emission/Enviro-Friendly Corridor
  - Includes a separate lane dedicated for transit use in the 710 Corridor.

- CAT 4: Public-Private Partnership
  - Proposes PPP approach for operating mandatory Zero Emission Freight Corridor under an Operation and Maintenance contract, with Design-Build/Finance/Operate contract.

- CAT 5: Early Action
  - Includes study of PPP (potentially finance, construct, and operate 1-710 improvements).

- CAT 6: Early Action
  - Includes study of PPP (potentially finance and construct 1-710 improvements).
Caltrans Response
Caltrans response letters outline the practical, legal, technical, and jurisdictional rationale for why certain elements of CA-7 fall outside the purview of the I-710 Project-Level EIR/EIS.
Corridor Advisory Committee Recommendation
June 19, 2014 Meeting:

- Include Alternative Community Alternative 7 (CA-7) in its entirety in the RDEIR/SDEIS

July 17, 2014 Meeting:

- And, include Alternative 5C and Alternative 7 in the RDEIR/SDEIS
Technical Advisory Committee Recommendation
## TAC Meetings

<table>
<thead>
<tr>
<th>Meeting Date</th>
<th>Discussion Items</th>
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<tbody>
<tr>
<td>February 19, 2014</td>
<td>• Initial Traffic Forecasts: Alternative 5C and Alternative 7&lt;br&gt;• Review of Geometric Concept Plans</td>
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<tr>
<td>March 19, 2014</td>
<td>• Status of Geometric Concept Plans&lt;br&gt;• Zero Emissions Vehicles Commercialization Process&lt;br&gt;• Strategic Transportation Plan: Active Transportation Elements and Traffic Forecasts</td>
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<tr>
<td>April 16, 2014</td>
<td>• Alternative Refinements and Programmatic Elements&lt;br&gt;• Consider Project Recommendations</td>
</tr>
<tr>
<td>June 18, 2014</td>
<td>• Traffic Operations / Design Enhancements&lt;br&gt;• Draft TAC Recommendation</td>
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<tr>
<td>July 16, 2014</td>
<td>• Finalize TAC Recommendation</td>
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</table>
TAC Recommendations

1. Recommend Alternative 5C and Alternative 7, as well as all elements of CA-7 that are legally and jurisdictionally implementable and that meet or are consistent with the Purpose and Need of the I-710 EIR/EIS.

2. Direct METRO/COG to coordinate with appropriate outside agencies to develop a "Comprehensive 710 Corridor Program" to initially focus on the remaining elements of CA-7. And, for METRO/GCCOG to look at funding options for the "Comprehensive 710 Corridor Program".
Purpose and Need

• I-710 Corridor Purpose & Need:
  – Improve air quality and public health
  – Improve traffic safety
  – Address design deficiencies
  – Address projected traffic volume
  – Address projected growth in population, employment and economic activity related to goods movement
What Happens Next
RDEIR/SDEIS Schedule

- Project Committee recommendation – RDEIR/SDEIS Alternatives (July 2014)
- Complete preliminary design and traffic forecasts for use in updated studies (August 2014)
- Complete updated engineering and environmental studies of alternatives (Early 2015)
- Circulate RDEIR/SDEIS for public review (Early 2016)
- Address public and agency comments on the RDEIR/SDEIS (Mid 2016)
- Identify Preferred Alternative (Mid 2016)
- Complete Final EIR/EIS (Early 2017)
- Project Approval/Record of Decision (Early 2017)
VIII. REPORTS
ITEM B
Recommended Alternatives to be Included for Evaluation in the I-710 RDEIR/SDEIS

1. Preliminary Alternatives 5C and 7 – Report by URS
Alternative 5C

General Description

Alternative 5C focuses on making improvements to the I-710 mainline freeway similar to the concepts previously defined and analyzed in the June 2012 Draft EIR/EIS as Alternative 5A (10-GP Lanes). In this case, Alternative 5C would add general purpose (GP) lane capacity to I-710 as well as geometric design improvements needed to modernize the freeway in order to address traffic flow and safety. Alternative 5C improves upon this design concept by adding design features at key locations to separate cars and trucks and by adding air quality measures. It includes full “Safety Modernization” features and it incorporates selected community elements such as bicycle and pedestrian linkages. Physically, Alternative 5C is different from Alternative 7 in that it does not include a freight corridor. Major components of Alternative 5C are further described in the following overview.

Design Features for High Truck Volume Locations

Alternative 5C includes several design features that are targeted towards reducing truck-auto conflicts on the freeway, which, in turn, reduces the risk of accidents.

- Buffered Downtown-Only Lanes approaching downtown Long Beach (i.e., south of I-405) – A high percentage of autos are separated from a high percentage of trucks along this segment of I-710.
- Truck Bypass Lanes at the I-405 Interchange – Trucks on I-710 are separated from autos through the interchange.
- Connector and Ramp Braiding at the SR-91 and I-105 Interchanges – Short weaving areas are removed on both the I-710 and SR-91.
- Local Interchange Modifications in the Central Section of the Corridor – Leads to more efficient traffic operations that reduce ramp queuing.
- Collector Distributor Roads and Ramp Braiding for the stretch of I-710 between Bandini Blvd. and I-5 – Short weaving areas are removed and trucks bound for local industry and inland areas are separated.

Freeway

As indicated by traffic analysis and geometric development studies, Alternative 5C proposes operational design features at high truck volume locations. General purpose lanes would be added to capacity deficient sections. To help reduce right of way impacts, the mainline alignment of I-710 would be optimally placed and abutments/columns for overcrossing
structures would be positioned without accommodation of future general purpose through lanes and/or freight corridor capacity additions.

**Interchanges**

Safety Modernization improvements feature interchange reconfigurations that correct and/or improve existing deficient traffic operations. Deficiencies include high accident and traffic conflict locations that degrade capacity. These configuration strategies include:

- Combining ramp entrances/exits to remove mainline conflict points.
- Braiding ramps to separate conflict points.
- Limiting or removing local ramps within system interchanges to remove conflict points.
- Adding or extending auxiliary lanes to correct/improve deficient merging/diverging operations.
- Correcting/improving poor geometrics, such as sight distance, curve design speed, clearances, and other key features.
- Controlling ramp intersections and modifying adjacent intersections on local streets.

**Air Quality Improvement Measures**

The following measures are proposed as programmatic features to be included in the overall funding commitments for Alternative 5C. Specific funding amounts are still to be determined, but the measures listed below would be in addition to any specific mitigation measures included in the RDEIR/SDEIS to address air quality/health risk impacts resulting from project construction or operation:

- Funding of facilities needed to support zero emission/near zero emission (ZE/NZE) trucks within the I-710 Corridor, such as electric charging stations and/or hydrogen refueling stations.
- Funding of ZE/NZE trucks through existing programs (e.g., Measures ONRD-01 through ONRD-04 in the 2012 Air Quality Management Plan) and/or through new programs such as the Gateway Cities Technology Deployment Program currently under development. Funding will require that a fixed percentage (e.g., 80%) of the vehicle miles traveled (VMT) of these new ZE/NZE trucks would occur within a defined air quality improvement “zone” within the I-710 Corridor.
- Funding of an I-710 Corridor Community Health Program, similar to the Port of Long Beach’s Community Mitigation Grant Program.
Other Components

- I-710 Study Area Arterial Intersection Improvements, incorporating modifications needed to address deficiencies based on updated traffic forecasting results.

- Active Transportation Features (New Enhancements), such as River-Park Pathway Connections (selected from the Gateway Cities Active Transportation Plan) and improved bicycle and pedestrian elements of I-710 arterial interchange modifications.

- TSM/TDM/ITS Improvements, such as adaptive ramp metering on I-710, peak period parking restrictions on selected key arterials, and updated traffic signals.

- Transit Improvements, including increased light rail service (Blue Line, Green Line), Metrolink commuter rail service, express bus service, and local bus service, within the I-710 Study Area.

- Alternative 1 (No Build) Improvements (including maximum goods movement by rail).

- Consideration of Public/Private Partnership (PPP) options to finance and construct Alternative 5C.
Alternative 7

General Description

Alternative 7 starts with the previously defined concept of a zero emission freight corridor that was analyzed in the June 2012 Draft EIR/EIS. The design concept for this alternative has been refocused to feature the I-710 build components described in “Community Alternative 7.” Alternative 7 retains a four-lane Zero Emission/Near Zero Emission (ZE/NZE) freight corridor. However, the conceptual design for Alternative 7 does not propose adding general purpose through lane capacity to the mainline of I-710. Rather, proposed geometric modifications to I-710 will incorporate “Safety Modernization” operational elements to address traffic flow and safety. Major components of Alternative 7 are further described in the following overview.

ZE/NZE Freight Corridor

The ZE/NZE Freight Corridor features two lanes in each direction for use by zero emission and near-zero emission trucks only, between the Southern Terminus located near the Port Complex in Long Beach (Pico/Anaheim) and the Northern Terminus located near the Rail Yard Complex in Commerce/Vernon (Bandini/Washington). The ZE/NZE Freight Corridor would not be tolled. Freeway corridor access points include:

- North/South mainline connections to/from I-710 located:
  - Near Anaheim St. in the Harbor Section of Long Beach
  - Near Del Amo Blvd. in North Long Beach
  - Near Bandini Blvd. in Vernon
- East/West system connections to/from SR-91, located between Atlantic Ave. and Cherry Ave. in North Long Beach
- Local ramp connections serving:
  - Pico Ave. in the Harbor Section of Long Beach
  - Anaheim St. in the Harbor Section of Long Beach
  - Slauson Ave. in Commerce
  - Washington Blvd. in Commerce

Freeway

Geometric development will maintain the existing general purpose (GP) through lanes on I-710 as a principal feature.
In addition:

- The mainline alignment will be positioned so as not to preclude future GP lane additions should the need for these be warranted at some future date.
- Abutments/Columns for overcrossing structures will also be positioned to provide room for GP lane additions should these become necessary at some point in the future.

Interchanges

Safety Modernization improvements feature interchange reconfigurations that correct/improve existing deficient traffic operations. Deficiencies include high accident locations and conflict locations that degrade capacity. Configuration strategies will include:

- Combining ramp entrances/exits to remove mainline conflict points.
- Braiding ramps to separate conflict points.
- Limiting or removing local ramps within system interchanges to remove conflict points.
- Adding or extending auxiliary lanes to correct/improve deficient merging/diverging operations.
- Correcting/improving poor geometrics, such as sight distance, curve design speed, clearances, and other key features.
- Controlling ramp intersections and modifying adjacent intersections on local streets.

Air Quality Improvement Measures

In addition to the provision of a dedicated four lane freight corridor for use by ZE/NZE trucks only as described above, the following measures are proposed as programmatic features to be included in the overall funding commitments for Alternative 7. Specific funding amounts are still to be determined, but the measures listed below would be in addition to any specific mitigation measures included in the RDEIR/SDEIS to address air quality/health risk impacts resulting from project construction or operation:

- Funding of facilities needed to support ZE/NZE trucks within the I-710 Corridor, such as electric charging stations and hydrogen refueling stations.
- Funding of ZE/NZE trucks through existing programs (e.g., Measures ONRD-01 through ONRD-04 in the 2012 Air Quality Management Plan) and/or through new programs such as the Gateway Cities Technology Deployment Program currently under development. Funding will require that a fixed percentage (e.g., 80%) of the vehicle miles traveled (VMT) of these new ZE/NZE trucks would occur within a defined air quality improvement “zone” within the I-710 Corridor.
- Funding of an I-710 Corridor Community Health Program, similar to the Port of Long Beach’s Community Mitigation Grant Program.

**Other Components**

- I-710 Study Area Arterial Intersection Improvements, incorporating modifications needed to address deficiencies based on updated traffic forecasting results.
- Active Transportation Features (New Enhancements), such as River-Park Pathway Connections (selected from the Gateway Cities Active Transportation Plan) and improved bicycle and pedestrian elements of I-710 arterial interchange modifications.
- TSM/TDM/ITS Improvements, such as adaptive ramp metering on I-710, peak period parking restrictions on selected key arterials, and updated traffic signals.
- Transit Improvements, including increased light rail service (Blue Line, Green Line), Metrolink commuter rail service, express bus service, and local bus service, within the I-710 Study Area.
- Alternative 1 (No Build) Improvements (including maximum goods movement by rail).
- Consideration of Public/Private Partnership (PPP) options to finance and construct Alternative 7.
VIII. REPORTS
ITEM B
Recommended Alternatives to be Included for Evaluation in the I-710 RDEIR/SDEIS

3. Alternative Comparison Summary – Report by URS
The following chart summarizes and compares the seven elements of Community Alternative 7, proposed by the Coalition for Environmental Health and Justice, with the alternatives proposed for further study in the Recirculated Draft EIR/Supplemental Draft EIS (RDEIR/SDEIS).

<table>
<thead>
<tr>
<th>CA7.1 General Purpose Lanes</th>
<th>Alternative 7</th>
<th>Alternative 5C</th>
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<tbody>
<tr>
<td>Maintains current configuration (number of lanes) but includes other freeway improvements</td>
<td>Maximum of 8 general purpose lanes</td>
<td>Maximum of 10 general purpose lanes with minimization of property impacts</td>
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<tr>
<td>Modernizes the design and reconfigure arterial interchanges to enhance safety without removing existing structures</td>
<td>Freeway configurations do not preclude future general purpose lane additions with minimization of property impacts</td>
<td>Modernizes the design of arterial and freeway/freeway interchanges with minimization of property impacts</td>
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<tr>
<th>CA7.2 Public Transit</th>
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<tr>
<td>Includes an aggressive strategy to improve public transit via rail and bus in the I-710 Corridor</td>
<td>Includes significant increase in light rail and bus transit services in the I-710 Corridor</td>
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<tr>
<td>Includes substantial investments in public transit in the project area and implements a corridor-wide, comprehensive transit capacity enhancement</td>
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<tr>
<th>CA7.3 Zero Emissions Freight Corridor</th>
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<tr>
<td>Includes a separate 4 lane elevated Freight Corridor restricted for use by Zero Emissions trucks with enforceable commitment to use zero-emission technologies immediately upon project completion.</td>
<td>Includes a separate 4 lane Freight Corridor with enforceable restrictions for use by Zero Emission/Near-Zero Emission trucks</td>
<td>No Freight Corridor included in this alternative.</td>
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<th>CA7.4 Public Private Partnership (PPP)</th>
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<tr>
<td>Proposes PPP approach for operating mandatory Zero Emission Freight Corridor under an Operation and Maintenance contract, or Design-Build-Finance-Operate contract</td>
<td>Includes study of PPP to potentially finance, construct, and operate I-710 improvements</td>
<td>Includes study of PPP to potentially finance and construct I-710 improvements</td>
</tr>
<tr>
<td>Community Alternative 7</td>
<td>Alternative 7</td>
<td>Alternative 5C</td>
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| **CA7.5 River Improvements** | • Includes restoration of the natural river functions for entire river system in the corridor; the treatment of run-off from the freight corridor, and improved river access through walk/bike networks  
• Ensures that the LA River will not be used as an electric transmission right of way. | • Includes treatment of stormwater run-off from the freeway and freight corridor  
• Relocates Dominguez Gap Basin | • Includes treatment of stormwater run-off from the freeway.  
• Avoids Dominguez Gap Basin |
| **CA7.6 Pedestrian and Bicycle Elements** | • Includes adequate and safe bicycle and pedestrian infrastructure, and the connection and enhancement of bike path networks along Rio Hondo, Compton Creek, and the LA River  
• Connects communities on either side of I-710 with a series of pedestrian and bicycle-only bridges or lids every ¼-½ mile  
• Supports through planning and implementation grants all communities in the corridor study in drafting and adopting pedestrian and bicycle master plans  
• Establish a dense network of bicycle-friendly neighborhood routes  
• Implement Complete Street treatments (including "road diets") on principal arterial and collector streets throughout the corridor study area, prioritizing those that currently cross I-710 and the Los Angeles River.  
• Implement best design practices for bicycles and pedestrians at freeway on/off ramps.  
• Utilize existing underused railroad and utility rights of way to construct separated pedestrian/bicycle paths.  
• Stripe bicycle lanes and install sufficient bicycle parking racks at industrial and commercial facilities. | • Accommodates active transportation projects from the Active Transportation Element of the GCCOG STP.  
• Incorporates Caltrans Complete Intersections Guide, which explicitly requires consideration of bicycles and pedestrians in highway designs.  
• Provides coastal trail linkage between LARIO Trail and Anaheim St. and Class I bikeway between LARIO and LA Bike Path. | • Accommodates active transportation projects from the Active Transportation Element of the GCCOG STP.  
• Incorporates Caltrans Complete Intersections Guide, which explicitly requires consideration of bicycles and pedestrians in highway designs.  
• Provides coastal trail linkage between LARIO Trail and Anaheim St. and Class I bikeway between LARIO and LA Bike Path. |
<table>
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<tr>
<th>Community Alternative 7</th>
<th>Alternative 7</th>
<th>Alternative 5C</th>
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</table>
| • Provide safe and effective walking and cycling connections to passenger rail stations and bus stops. | • Avoids/minimizes impacts to community facilities/services compared to previous Build Alternatives  
• Includes Community Health Grants Program  
• Would identify additional mitigation measures in the RDEIR/SDEIS after the determination of project impacts. Examples of measures included in the 2012 Draft EIR/EIS are: landscaping and hardscape aesthetic treatments as part of an I-710 Corridor Master Plan, funding of additional air quality monitoring stations, and improving access to the LARIO trail as part of the design of arterial street crossings of the Los Angeles River. | • Avoids/minimizes impacts to community facilities/services compared to previous Build Alternatives  
• Includes Community Health Grants Program  
• Would identify additional mitigation measures in the RDEIR/SDEIS after the determination of project impacts. Examples of measures included in the 2012 Draft EIR/EIS are: landscaping and hardscape aesthetic treatments as part of an I-710 Corridor Master Plan, funding of additional air quality monitoring stations, and improving access to the LARIO trail as part of the design of arterial street crossings of the Los Angeles River. |

### CA7.7 Community Benefits
- Includes a list of community design improvements that avoid demolition of neighborhood facilities/services, maintain and enhance parks, streetscapes, bike and pedestrian pathways, and incorporate additional public art, traffic control measures, greenbelts and open space linkages within the project area.

### CCA7 Construction Community Alternative 7 (Applies to the Construction Phase of the Project)
- CCA7.1 Allocated Funds for mitigation, safety and outreach  
- CCA7.2 Free Public Transit program  
- CCA7.3 Zero-Emission/Near Zero-Emission Construction Equipment  
- CCA7.4 Comprehensive Pedestrian and Bicycle Safety Element

- Implements standard construction practices to reduce impacts to the community including, but not limited to locating construction staging areas away from sensitive receptors (homes, schools, and parks), providing community information programs and meetings to keep the public informed about construction activities, and strict adherence to

- Implements standard construction practices to reduce impacts to the community including, but not limited to locating construction staging areas away from sensitive receptors (homes, schools, and parks), providing community information programs and meetings to keep the public informed about construction activities, and strict adherence to
### Community Alternative 7

- **CCA7.5 Community Benefits**
  - Residential and school noise mitigation program
  - Residential and School Air Pollution Mitigation
  - Outreach, Communication and Compliance
  - Job training, workforce development and targeted hire
  - Health Study
  - MBE, WBE, and SBE utilization and retention program

### Alternative 7

- SCAQMD Rule 403 regarding fugitive dust emissions.
- After determination of project construction impacts, specific mitigation measures will be considered including, but not limited to Metro’s Green Construction policies, targeted emission exposure reduction programs, and early landscaping of areas where construction is complete. These measures would be in addition to the 73 construction-related mitigation measures included in the 2012 Draft EIR/EIS.

### Alternative 5C

- SCAQMD Rule 403 regarding fugitive dust emissions.
- After determination of project construction impacts, specific mitigation measures will be considered including, but not limited to Metro’s Green Construction policies, targeted emission exposure reduction programs, and early landscaping of areas where construction is complete. These measures would be in addition to the 73 construction-related mitigation measures included in the 2012 Draft EIR/EIS.
VIII. REPORTS
ITEM B
Recommended Alternatives to be Included for Evaluation in the I-710 RDEIR/SDEIS

May 22, 2014

Mr. Adrian Martinez  
Staff Attorney  
Earthjustice, Counsel for Coalition for Environmental Health and Justice (CEHAJ)  
50 California St., Ste. 500  
San Francisco, CA 94111

Subject: I-710 Corridor Project – Response to Letter of April 17, 2014

Dear Mr. Martinez:

Thank you for your letter of April 17, 2014, regarding the offer of assistance in clarifying the complex disputes regarding the environmental review of the I-710 Corridor Project. Your letter offers perspectives on the Governor’s veto of Senate Bill 811 (SB 811) and its relevance to the environmental review of the I-710 Corridor Project, and expresses concerns regarding Caltrans fulfilling its role as the lead agency under the National Environmental Policy Act (NEPA). Caltrans and its agency partners on the I-710 Corridor Project welcome your invitation to engage in a constructive dialogue with CEHAJ to ensure that the I-710 Corridor Project is developed in a manner sensitive to the concerns of the Corridor communities and stakeholders.

Perspectives on SB 811

We believe the Governor’s message of October 11, 2013, to the Members of the California State Senate regarding SB 811 makes two points very clear. First, by stating that “statutorily requiring the project environmental impact report to consider specified mitigation measures that exceed the project’s scope is a precedent I don’t wish to establish.”, the Governor made it very clear that mitigation measures should be based on the actual impacts of the project. We are following through with the Governor’s statement in the CEQA/NEPA process to ensure that any proposed mitigation measures are tied to project impacts and that the alternatives, as proposed, do include those project features that are directly tied to addressing the defined purpose and need of the project. Your letter notes that Community Alternative 7 (CA-7) proposed by CEHAJ includes elements that should not be considered mitigation, but as features of the project alternatives themselves. As discussed later in this letter, almost all of the elements of CA-7 are proposed for inclusion in the revised alternatives to be studied in the Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement (RDEIR/SDEIS) for the project.

“Caltrans improves mobility across California”
The second key point in the Governor’s message is his statement that, “Caltrans is instructed to work with the author and local stakeholders on identifying mitigation measures within the scope of CEQA that ensure the I-710 project benefits motorists, goods movement, the community, and the environment.” We believe we are following this direction from the Governor, and we are committed to continuing a constructive dialogue on the I-710 Corridor Project with CEHAJ and other community stakeholders. As you know, members of my staff and I have met with various CEHAJ representatives both individually and in group meetings multiple times since CA-7 was first proposed in 2012. Those meetings have been beneficial to Caltrans in helping us better understand the different elements of CA-7, and we hope they have been beneficial to representatives of CEHAJ in understanding the limitations that Caltrans has in addressing certain elements of CA-7. Please be advised that I will shortly request another meeting with CEHAJ representatives to continue this dialogue.

Caltrans’ Responsibilities under NEPA

Caltrans takes its role under the Memorandum of Understanding with the Federal Highway Administration (FHWA) to implement NEPA very seriously. Many of the technical analyses (such as the Health Risk Assessment, environmental justice analysis, and inclusion of public health considerations for all environmental topics) included in the I-710 Corridor Project environmental process go above and beyond Caltrans’ standard procedures for environmental review. Your letter cites the provisions of Executive Order 12898 on Environmental Justice, as well as U.S. Department of Transportation and FHWA Orders to implement Executive Order 12898. Your letter also restates many of the environmental justice concerns raised by CEHAJ in its comment letter of September 28, 2012 on the I-710 Corridor Project Draft EIR/EIS. Again, Caltrans is fully committed to fulfilling its responsibilities under NEPA to comply with Executive Order 12898, as well as addressing the comments received on the I-710 Corridor Project Draft EIR/EIS. Specifically, as has already been shared with CEHAJ representatives in previous meetings (most recently on March 17, 2014, at a meeting with representatives from the East Yard Communities for Environmental Justice), the design of the I-710 build alternatives have been revised to avoid and minimize impacts to important community facilities such as the Long Beach Multi-Service Center, Bell Shelters, and Shelter Partnerships.

Inclusion of CA-7 in the RDEIR/SDEIS

In the closing paragraph of your letter, you ask for a response to the question that has been previously asked, and that is whether CA-7 will be analyzed in its entirety in the RDEIR/SDEIS. As Caltrans’ staff has consistently stated in previous meetings with CEHAJ representatives, there are elements included in CA-7 that are simply not within Caltrans’ jurisdiction to implement as the owner-operator of I-710 and as the Lead Agency under CEQA and NEPA (e.g., “restoration of the natural river functions” as stated in CA-7 Element 5 – River Improvements). Therefore, we will not be analyzing CA-7 in its entirety in the RDEIR/SDEIS. However, Caltrans has worked with our agency partners and project consultants to incorporate most elements of CA-7 in both of the alternatives proposed for analysis in the RDEIR/SDEIS. For example, proposed Alternative 7 includes a zero emission/near zero emission freight corridor as proposed in CA-7 Element 3 (Committed Zero Emission Freight Corridor), but with no additional general purpose lanes as proposed in CA-7

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Element 1 (No Widening of General Purpose Lanes). In addition, both proposed Alternatives 5C and 7 include the construction of specific bikeway and river trail linkages along the Los Angeles River as proposed in CA-7 Element 6 (Comprehensive Bicycle and Pedestrian Element). Proposed Alternatives 5C and 7 also include programmatic components such as a Community Health Benefits grant program as proposed in CA-7 Element 7 (Community Benefits and Enhancements). A detailed table comparing the elements of proposed Alternatives 5C and 7 to the elements of CA-7 is attached for your reference.

In conclusion, I want to thank you again for sharing CEHAJ’s perspectives and concerns. We look forward to continuing to work with together with CEHAJ and other community groups to ensure that the I-710 Corridor Project benefits the community and the environment.

Very truly yours,

RONALD KOSINSKI
Deputy District Director, Division of Environmental Planning
California Department of Transportation, District 7

Attachment: I-710 Corridor Project Alternative Comparisons Matrix

cc: Maya Golden-Krasner, Communities for a Better Environment
   Susanne Browne, Legal Aid Foundation of Los Angeles
   Ramya Sivasubramanian, Natural Resources Defense Council
   Angelo Logan, East Yard Communities for Environmental Justice
   Patricia Ochoa, Coalition for Clean Air
   Carrie Bowen, Caltrans District 7
   Frank Quon, Los Angeles County Metropolitan Transportation Authority
   Richard Powers, Gateway Cities Council of Governments
July 11, 2014

Community Advisory Committee Members
via e-mail

Subject: Follow-up to June 19 CAC discussion on Community Alternative 7

Dear CAC Members,

During the June 19, 2014 Community Advisory Committee meeting the Committee discussed specific elements of Community Alternative 7 that Caltrans is not studying in the RDEIR/SDEIS. In response to four main points that members of the Committee discussed at length, Caltrans has prepared this letter. I expect that this will help in clarifying the reasoning behind some of the elements that differ between Community Alternative 7 and the proposed Alternative 7. There appear to be four main issues of contention regarding elements of Community Alternative 7 that are not “fully included” within the proposed Alternative 7.

Aggressive transit improvement strategy. Section CA7.2 of the CEHAJ CA7 Community Alternative proposal advocates for “an aggressive strategy to improve public transportation via bus and rail in the I-710 corridor”, including considerations for “building additional light rail capacity or expanding bus routes and service”. Additionally, section CCA7.2 (Free Public Transit program) of Appendix 1 of the proposal calls for Caltrans, by way of Metro, to “provide free rides on the Metro Blue Line and make additional Metro Bus Lines free when the I-710 will be closed for demolition and construction work.”

Transit improvements are the domain of Metro, rather than Caltrans. As a component of the I-710 Corridor Project, Metro is proposing significant light rail and bus transit increases in the corridor as part of the I-710 Corridor Project. This commitment was originally made in Chapter 2 of the June 2012 Draft EIR/EIS and will be re-affirmed in the Recirculated Draft EIR/Supplemental Draft EIS.

This commitment was made in spite of technical analyses that show that these proposed increases in transit service have very limited effect on addressing key elements of purpose and need. Within the I-710 corridor, even with higher transit shares of person-travel than most of Los Angeles County, it would require a 20-25% increase in transit services to reduce auto trips by one to two percent. It is the belief of the project sponsors, however, that this investment in increased transit services, along with other proposed project trip reduction strategies such as transit demand management and active transportation, will have a measurable benefit on corridor mobility. That is why these elements have been included in all of the build alternatives since early in this environmental study.

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The project team has previously studied the potential for transit usage in the corridor (Final Report, Technical Memorandum – Multimodal Review, March 2009; available on Metro’s website) and, for example, found that decreasing the Blue Line’s headways to the greatest extent feasible (approximately 5 minutes in peak hours) while still operating under system restrictions, would result in a boarding increase of approximately 8 percent. Assuming every new boarding is a single-occupant driver, this increase in Blue Line ridership would decrease study area auto trips by less than one-half percent (approximately 3,350 auto trips).

With regard to the free transit program proposed during construction, the project team will consider options such as transit vouchers or other measures similar to what is currently being implemented on the I-5 reconstruction project.

**Revitalization and restoration of the Los Angeles River.** Section CA7.5 of the CEHAJ proposal discusses river improvements, specifically “restoration of the natural river functions, including recreational trails, restored wetlands, continuous fish migration corridors, and native landscaping.” A follow-up document provided by CEHAJ in summer 2013 titled “Draft: The Coalition for Environmental Health and Justice (CEHAJ) LA River Improvements of Community Alternative 7 (CA7)” set forth guidelines for design elements and enhancements of river-centric connections.

Improvements to the Los Angeles River are solely the domain of the United States Army Corps of Engineers (USACOE). If any of the proposed project alternatives would impact the River, those impacts will be quantified and appropriate mitigation measures will be proposed that would contribute to the revitalization and restoration of the River. The appropriate level of funding for the mitigation will be negotiated with USACOE. Per the Executive Office’s Council on Environmental Quality, “Memorandum for Heads of Federal Departments and Agencies: Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact” (dated January 14, 2011, accessed at http://ceq.hss.doc.gov/current_developments/docs/Mitigation_and_Monitoring_Guidance_14Jan2011.pdf), “Agencies should not commit to mitigation, however, unless they have sufficient legal authorities and expect there will be necessary resources available to perform or ensure the performance of the mitigation.” Similarly, per the Federal Highway Administration’s Environmental Review Toolkit section on NEPA and Transportation Decisionmaking: Mitigation of Environment Impacts (http://environment.fhwa.dot.gov/projdev/tdmitig2.asp), “FHWA’s mitigation policy states: Measures necessary to mitigate adverse impacts will be incorporated into the action and are eligible for Federal funding when the Administration determines that: 1. The impacts for which the mitigation are proposed actually result from the Administration action; and 2. The proposed mitigation represents a reasonable public expenditure after considering the impacts of the action and the benefits of the proposed mitigation measures. In making this determination, the Administration will consider, among other factors, the extent to which the proposed measures would assist in complying with a Federal statute, Executive Order, or Administration regulation or policy.”

CEQA grants public agencies the authority to mitigate in section 15041 of the CEQA guidelines. “(a) A lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the
environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law.

River enhancements as a proposed project feature are inappropriate uses of federal, state, and local transportation dollars from which Metro and Caltrans projects are funded. Recently, USACOE recommended approval of a comprehensive, stand-alone proposal (Los Angeles River Ecosystem Restoration Alternative 20) to restore habitat, widen the river, create wetlands and provide access points and bike trails for an 11-mile stretch of the river north of downtown Los Angeles, at a cost of approximately $1 billion to be shared between federal, state and city sources. Caltrans commends this decision by USACOE and looks forward to the development of a restoration project south of downtown.

**Targeted hiring measures to environmental justice populations.** Section CCA7.5 of Appendix 1 to the CEHAJ proposal discusses Community Benefits. Specifically, "Targeted workers means an individual whose primary place of residence is within an Economically Disadvantaged Area or an Extremely Economically Disadvantaged Area in the United States, or a Disadvantaged Worker...a minimum of 40% of all hours of Project Work shall be performed by Targeted Workers, with priority given to residents of Extremely Economically Disadvantaged Areas."

The Caltrans Office of Business and Economic Opportunity (http://www.dot.ca.gov/hq/bep/) is dedicated to increasing the participation of small businesses, disadvantaged business enterprises, and disabled veteran business enterprises in both State and Federal contracting and procurement. Caltrans is acutely aware of and committed to having parity in all projects. Caltrans identifies underrepresented groups in contracting on federally funded highway projects through data from the U.S. Department of Labor, U.S. Census, and the Federal-Aid Highway Construction Contractors Annual EEO Reports for California. Caltrans utilizes this information to increase the pool of qualified minorities, women, and disadvantaged persons in the highway construction industry. The On-The-Job Training/Supportive Services (OJT/SS) Program is the vessel Caltrans utilizes pursuant to Code of Federal Regulations (CFR), Title 23, Part 230, Subpart A. The OJT/SS program's purpose is to increase the participation and competencies of Equal Employment Opportunity groups that have been significantly underrepresented, to fulfill highway construction workforce needs. The goal of the OJT/SS program is to provide skills training for transportation workers that will lead to permanent journey-level careers in the highway construction industry. Caltrans solicits qualified contractors to submit proposals to conduct skilled trades training programs to increase competencies for inclusion in enhanced training programs. By increasing competencies, participants are prepared for inclusion into a U.S. Department of Labor recognized apprentice program. CFR, Title 23, §230.111 provides direction to Caltrans on determining which Federal-aid highway construction contracts shall include the "Training Provisions" and the minimum number of trainees to be specified therein after giving appropriate consideration to the guidelines set forth in §230.111(c). Caltrans feels that these ongoing training programs are the most effective way to support economically disadvantaged workers and prepare them for careers in the highway construction industry.

Additionally, Caltrans realizes the importance of ensuring the benefits of construction jobs are seen by the local communities impacted by such projects, especially when such communities are
economically disadvantaged. However, state and federal statutes prevent Caltrans from mandating location-based hiring on any contracts using state or federal funds (see 23 United States Code (USC) 112; 23 CFR 635.117(b)). Additionally, Proposition 209 precludes the State from implementing race- and gender-conscious programs related to non-federally-funded contracts. Currently, Metro is actively pursuing legislation that would allow transportation agencies “to prioritize hiring local residents for highway and transit projects” (http://bass.house.gov/press-release/rep-bass-introduces-legislation-benefit-local-workers).

**Comprehensive pedestrian and bicycle element.** Section CA7.6 of the CEHAJ proposal calls for Caltrans to, among other things, “support through planning and implementation grants all communities in the corridor study area in drafting and adopting pedestrian and bicycle master plans that reflect local conditions and priorities, and that facilitate regional connectivity.” Caltrans is also called to “connect the communities on either side of the I-710 with a series of pedestrian- and bicycle-only bridges or lids every ¼ to ½ mile, especially where there is a particularly long gap between existing street crossings.”

While the planning and implementation of pedestrian and bicycle master plans are not an eligible use of project related funds, Caltrans currently offers three different transportation planning grant programs for the upcoming fiscal year (FY) 2014-2015: Partnership Planning for Sustainable Transportation, Transit Planning for Sustainable Communities, and Transit Planning for Rural Communities. Additionally, it is anticipated that the Environmental Justice and Community-Based Transportation Planning grants will return for the FY 2015-16 grant cycle. All corridor communities are encouraged to apply for this grant funding. Forty applications statewide, totaling $5.3 million in funding, were selected for funding in FY 2014-15.

Constructing bridges over the I-710 at an interval of every ½ mile for the length of the project (approximately 20 miles) would represent an additional 40 structures that would be built in close proximity to, and potentially impacting, homes and neighborhoods. At an individual cost of $2-3 million the full array of pedestrian and bike-only bridges would add $40 to 60 million to the total project cost. When the project team made the decision to revise and recirculate the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS), it pledged to incorporate more flexibility into the new alternatives with regards to the future funding landscape and availability thereof. This additional cost to fund 40 new overcrossings does not appear feasible at this time, but as noted in the next section, several new structures are proposed to provide critical bicycle/pedestrian linkages within the I-710 Corridor.

In closing, I would like to remind you of the steps Caltrans and the project team is taking to ensure that the community’s voice is being heard. The following elements of Community Alternative 7 are being incorporated into Alternative 7, which is being proposed for inclusion in the RDEIR/SDEIS.

Under Alternative 7, there would be no widening of general purpose lanes, and modernization of existing interchanges is being designed to minimize right-of-way impacts to the fullest extent possible. It is not physically possible to modernize the design of existing interchanges and improve traffic safety with no impacts to adjacent properties. The proposed freight corridor in Alternative 7
would be restricted to use by zero and near zero-emission trucks, and Alternative 7 also proposes additional programmatic air quality improvement strategies.

The feasibility of a Public/Private Partnership (PPP) to design, operate and maintain the proposed improvements to I-710 will be studied and discussed in the RDEIR/SDEIS.

Significant increases in both light rail and bus transit services within the corridor are being proposed, as described in more detail above.

Stormwater treatment and Best Management Practices are an integral part of every Caltrans project, in line with the stringent requirements of our 2012 Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit.

The design of pedestrian and bicyclist infrastructure is being guided by Caltrans’ Complete Streets Implementation, which provides for “a transportation facility that is planned, designed, operated, and maintained to provide safe mobility for all users, including bicyclists, pedestrians, transit vehicles, truckers, and motorists, appropriate to the function and context of the facility” (Complete Streets Implementation Action Plan, 2010). Additionally, a Class I bikeway between LARIO and the LA River bike path will be provided.

During the project development process, the project team has worked to ensure any impacts to community facilities and services, as well as residential, commercial, and industrial buildings and facilities, will be minimized to the fullest extent possible. The project team has also proposed a Community Health Grants program be funded as an element of the proposed build alternatives, modeled after the Port of Long Beach’s Port Mitigation Grant Programs. Further specific mitigation measures will be identified and disclosed in the RDEIR/SDEIS, but only after impact determination is complete.

I expect that this will help in clarifying some of the questions raised by committee members regarding the some of the elements proposed by the authors of CA 7. We look forward to further providing additional information during the CAC Workshop scheduled for July 17. We appreciate your ongoing involvement and commitment to the process.

Very truly yours,

RONALD KOSINSKI
Deputy District Director, Division of Environmental Planning
California Department of Transportation, District 7

cc: CEHAJ