

COMMUNITIES FOR A BETTER ENVIRONMENT
LONG BEACH COMMUNITY ACTION PARTNERSHIP
EAST YARD COMMUNITIES FOR ENVIRONMENTAL JUSTICE
LEGAL AID FOUNDATION OF LOS ANGELES
LONG BEACH ALLIANCE FOR CHILDREN WITH ASTHMA
NATURAL RESOURCES DEFENSE COUNCIL
COALITION FOR CLEAN AIR
PHYSICIANS FOR SOCIAL RESPONSIBILITY

January 28, 2013

Dear Long Beach City Council I-710 Oversight Committee:

On behalf of the Coalition for Environmental Health and Justice ("CEHAJ"), we write to respond to the recommendations presented by the Gateway Cities Council of Governments ("GCOG") and the Technical Advisory Committee ("TAC"). These recommendations are being reviewed by the Community Advisory Committee ("CAC") as well. CEHAJ spent significant time and effort developing Community Alternative 7. Community Alternative 7 is a sound proposal that strikes an effective compromise to allow freight expansion to continue in a zero emissions manner while focusing on the true transportation needs and mitigation for residents who have suffered major impacts along the corridor. It also seeks to protect vital resources in the region ranging from the LA River to providers of services and provisions for homeless populations to protecting our schools from harmful noise and air pollution.

Overall, we are pleased that Caltrans, Metro and GCOG recommended to refine the environmental impact analysis based on comments received during the Environmental Impact Review ("EIR") comment period. This is significant because the recommendations take off the table two exceptionally flawed alternatives in 6A and 6B. Moreover, the recommendations propose two main components: a) recirculating the EIR and b) examining three alternatives, including a no build, modified 6C and a newly developed 6D. While many of the provisions of Community Alternative 7 are included in 6D, there are many portions that are not. We are pleased that the partnering agencies really took into account the significant comments provided. With that said, given that the agencies are reanalyzing the project, it is important to get the analysis parameters correct. This will help alleviate delay and prevent opposition from stakeholders down the line.

It is important that all of the mitigation and project elements that are part of Community Alternative 7 be included in the EIR analysis. The staff report recommends that instead of fully analyzing Community Alternative 7, the EIR analysis will include a matrix identifying what portions of Community Alternative 7 correspond to alternatives 6C and 6D. While this may be a helpful tool, it will not remedy the fact that portions of Community Alternative 7 will not be considered and analyzed in the EIR. While the new alternatives recommended (e.g. modified 6C and new 6D) are significant improvements upon the prior alternatives examined, we continue to recommend that the EIR analyze Community Alternative 7 in full.

We respectfully request that Long Beach City Council I-710 Oversight Committee recommending that Community Alternative 7 be analyzed and the following key objectives be fully addressed.

- The alternatives analyzed should be designed in a manner not to unduly impact residential, park, school or industrial properties.
- The alternatives analyzed should be designed in a manner not to unduly impact several providers of social services, including Shelter Partnerships, Bell Shelters, the Long Beach Multi-Service Center, and Season's at Compton senior housing.
- The analysis of alternatives should be conducted in a manner as to prefer a final project vs. a program EIR that allows for a tiered project approach.
- The analysis of alternatives should include a full study of a mandatory zero emission freight corridor via a "Public Private Partnership."
- The alternatives studied should consider all feasible mitigation measures.
- Proceed to develop and recirculate the Draft EIR/EIS.

We appreciate your consideration.

Sincerely,



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