May 5, 2021 – CEHAJ Statement Regarding I-710 Corridor Expansion Project

More than 20 years ago transportation planners proposed expanding a diesel truck pipeline through the Gateway Cities called the I-710 Expansion Project. Communities along the I-710 corridor, neighborhoods that are predominantly made up of people of color and have been negatively impacted by the freight industry, immediately began to organize. Throughout the last two decades, these communities, already experts about what it was like to live alongside one the busiest freeways, have also become technical experts that have consistently asked our transportation agencies to consider a better approach that centers public health. This effort was often met with opposition from our transportation planners – with the prevailing notion that we need to pursue this project to expand the freight industry even though it would perpetuate the racist legacy of our transportation system.

Region 9 of the United States Environmental Protection Agency (EPA) recently advised Caltrans and LA Metro that they cannot proceed with the project without doing a quantitative analysis under the Clean Air Act called a “hotspot” analysis. This analysis makes sure that new transportation projects will not result in violations of federal clean air standards or make existing violations worse. The Federal Highway Administration (FHWA) makes conformity determinations for highway projects like the I-710, but EPA plays an important advisory role. It is our understanding that the project proponents cannot show this project will meet the standard of the Clean Air Act, and EPA advised that they must do this quantitative hotspot analysis – despite LA Metro and Caltrans trying to figure a way out of doing this quantitative hotspot analysis. EPA articulated and came to the conclusions the community had known all along that a project adding diesel truck lanes would be bad for air quality. As a result, this EPA letter provides the perfect opportunity to stop this harmful project proposal, which is pushing forward decades old thinking of how to solve our transportation and air quality problems.

Caltrans and Metro must start over and work with impacted corridor communities to develop a transformational and modern set of solutions that truly addresses the urgent need to improve local air quality, safeguard housing, businesses, and public spaces, and provides much needed career opportunities for corridor residents. The approach rejected by EPA – of just paving additional truck lanes to stuff more diesel and fossil fuel trucks in our communities – is not a real solution to address our transportation and public health problems. This approach is also averse to what the current Secretary of Transportation, Pete Buttigieg, noted:

“Black and brown neighborhoods have been disproportionately divided by highway projects or left isolated by the lack of adequate transit and transportation resources. In the Biden-Harris administration, we will make righting these wrongs an imperative.”

Now is the time for LA Metro and Caltrans to innovate. Innovation means stopping the current legacy of oppression that ignores community concerns while pushing to expand a transportation system that disproportionately impacts BIPOC communities. In the greater Los Angeles area, and frankly everywhere, we can and must do better, especially now. Caltrans recognized the need for this shift in its 2020 Equity Statement, where it committed to “meaningfully engage communities most impacted by structural racism in the creation and implementation of the programs and projects that impact their daily lives” and to “reform [their] programs, policies and procedures based on this engagement.” The Coalition for Environmental
Health and Justice (CEHAJ) invites our transportation leaders to stand by these commitments by working with us on a project that centers community health and needs first by advancing:

- **Zero-Emissions** – Create a project with a zero-emissions only corridor using the existing right of way to allow our communities to breathe and address harms caused by the freight industry. This freight corridor will be well-timed to serve the zero-emission transition identified as necessary to meet clean air standards.

- **No Displacement** – Our communities are facing a housing crisis of epic levels, further exasperated by the devastating and unequal impacts of the COVID-19 pandemic, with low vacancy rates, rising rents and limited housing supply. This project must not displace residents, homeless serving facilities, or local businesses.

- **Better Public Transit and Alternatives to Driving** – Our communities have suffered from a traditional disinvestment in public transit, and LA Metro should invest in more robust public transit. In addition, the project must dramatically expand bike and pedestrian infrastructure in the corridor.

- **Targeted Hiring** – Whatever strategies are generated, they must include robust targeted hiring for local and disadvantaged residents for all the employment opportunities created, especially for constructions careers jobs.

- **Health** – The 710 Corridor has a legacy of health harms that cannot be ignored. We must support comprehensive health programs that advance our communities to be healthy and thriving, where the harms imposed from the freight industry are repaired and where health measures are preventive.

By actually partnering with impacted communities, we can do something truly innovative. CEHAJ applauds the EPA advice letter that articulates what we have known and said for decades – more lanes for diesel trucks will not solve our air quality crisis, it will only make it worse.

Here are the steps to move forward:

1. LA Metro and Caltrans must make clear that they are no longer pursuing Alternative 5C outlined in the 710 Expansion proposed Revised Draft Environmental Impact Report.
2. LA Metro shall undertake a process to create a zero-emissions freight highway using the existing right of way, including identifying strategies to push for the conversion of the port truck fleet to zero-emission technology.
3. LA Metro shall undertake a robust stakeholder process to identify key strategies to advance public transportation and alternatives to driving in the 710 corridor. In addition, the agency should work with health experts to address the public health harms the freight industry has imposed on communities.
4. LA Metro and Caltrans shall commit to robust employment opportunities for any projects along the 710 corridor through targeted hiring for local and disadvantaged residents.
5. LA Metro and Caltrans must work with community-based organizations and community members to create a meaningful community engagement processes that is transparent and intentional.

Communities for a Better Environment ■ East Yard Communities for Environmental Justice ■ Earthjustice ■ Legal Aid Foundation of Los Angeles ■ Long Beach Alliance for Children with Asthma ■ Long Beach Residents Empowered ■ Natural Resources Defense Council ■ Urban & Environmental Policy Institute (UEPI) at Occidental College

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