



Eco-Rapid Transit, formerly known as the Orangeline Development Authority, is a joint powers authority (JPA) created to pursue development of a transit system that moves as rapidly as possible, uses grade separation as appropriate, and is environmentally friendly and energy efficient. The system is designed to enhance and increase transportation options for riders of this region utilizing safe, advanced transit technology to expand economic growth that maximizes ridership in Southern California. The Authority is composed of the following public agencies:

- City of Artesia
- City of Bell
- City of Bell Gardens
- City of Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority
  
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- Vice-Chair  
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Councilmember  
City of Bell Gardens
  
- Executive Director  
Michael R. Kodama
  
- General Counsel  
Matthew T. Summers
  
- Ex-Officio  
William Rawlings  
City Manager Representative

**AGENDA REPORT**

**TO:** Members of Eco-Rapid Transit Board of Directors  
**FROM:** Michael Kodama, Executive Director  
**DATE:** September 8, 2021  
**SUBJECT: COMMUNICATION ITEMS TO THE BOARD**

Public comments on items on the agenda will be taken at the time the item is called and are limited to 3 minutes per speaker



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October 12, 2021

Nuria Fernandez  
Administrator  
Federal Transit Administration  
1200 New Jersey Avenue, SE  
Washington DC 20590

Re: Request for Information Concerning the Capital Investment Grants Program

Administrator Fernandez:

Eco-Rapid Transit Joint Powers Authority appreciates having an opportunity to provide input on improvements that could be made to your evaluation process for projects seeking funding from the Capital Investment Grants (CIG) Program. Eco-Rapid Transit appreciates how the Federal Transit Administration (FTA) evaluates and measures the benefits and costs of transit mobility. Eco-Rapid Transit further understands the importance of economic development, land use, environmental, cost effectiveness, mobility needs, capacity needs, congestion relief and local financial commitment. We also now believe it is time for FTA to add environmental justice and Justice40 considerations to its evaluation criteria.

Eco-Rapid Transit consists of 12 members in Los Angeles County. Most of our members are environmental justice communities located along the proposed 19.4-mile West Santa Ana Branch (WSAB) rail transit corridor. According to the Draft WSAB EIS/EIR (2021) there are 1.4 million residents and 618,500 jobs in the WSAB corridor. Approximately 18 percent do not have access to their own car. 65% of the residents are racial minorities with 44 percent of the corridor residents living below the poverty line. Some of the WSAB cities have densities that rival Manhattan.

There are many communities such as ours who have been a victim rather than a beneficiary of transportation improvements. This is a question of fairness and equity. It is critical that FTA move forward and now consider the importance of environmental justice and Justice40 as defined under the President Biden administration. It is time that environmental justice communities, adversely impacted by environmental and socioeconomic factors affecting the health, environmental and quality of life of the local residents on a regular basis, be treated more fairly and be considered as worthy or more worthy of transit investments as are more affluent communities.

We support the policy of Justice40 that would bring at least 40 percent of the overall benefits from Federal investments in climate and clean energy to disadvantaged communities. For too long, transportation and environmental policy decisions have failed to adequately account for environmental injustice including the disproportionate, disparate and cumulative impacts pollution and climate change have on low-income communities and communities of color.



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This new path can include historical investments to help address environmental justice in our communities.

If you have any questions, please contact our Executive Director Michael Kodama who can be reached at [mkodama@eco-rapid.org](mailto:mkodama@eco-rapid.org) or at 818 468-8593.

Thank you very much for considering our comments.

Sincerely,

Ali Sajjad Taj  
Chair, Eco-Rapid Transit