



No 710 ACTION COMMITTEE

LOS ANGELES NEIGHBORHOOD COUNCILS

Arroyo Seco
Cypress Park
Eagle Rock
El Sereno
Glassell Park
Highland Park
Lincoln Heights
Sunland-Tujunga

CITIES

City of Glendale
City of Los Angeles
City of La Cañada Flintridge
City of South Pasadena

OPPOSITION GROUPS (PARTIAL LIST)

Caltrans Tenants of the 710 Corridor
Natural Resources Defense Council
East Yard Communities for Environmental Justice
Glassell Park Improvement Association, Land Use Committee
Far North Glendale Homeowners Association
Crescenta Valley Town Council
La Cañada Flintridge Unified School District
LA RED, El Sereno

Green Scissors 2011 Report Groups

Friends of the Earth
Taxpayers for Common Sense
Heartland Institute
Public Citizen

INJUNCTION PLAINTIFFS

City of South Pasadena
Sierra Club
National Trust for Historic Preservation
California Preservation Foundation
Los Angeles Conservancy
Pasadena Heritage
South Pasadena Preservation Foundation
South Pasadena Unified School District

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January 30, 2012

**Southern California Association of Governments
Attention: Margaret Lin
Southern California Association of Governments
818 West 7th Street, 12th Floor
Los Angeles, CA 90017**

Sent via email to: lin@scag.ca.gov

Subject: Comments on SCAG DRAFT 2012 RTP

Who We Are

The No 710 Action Committee is a grassroots organization with members from the northeast area of Los Angeles and surrounding communities, including Alhambra, Eagle Rock, El Sereno, Highland Park, Glassell Park, Glendale, La Crescenta, La Canada, Los Angeles, Pasadena, and South Pasadena. Our group is comprised of residents as well as business and health professionals from diverse backgrounds and communities who are committed to improving transportation modes across and within the County. Our members include community organizers and activists, engineers, elected officials, scientists, economists, physicians and other health care professionals. Cities, neighborhood councils and groups that have taken official positions against the SR-710 extension represent over 500,000 people.

Through decades of involvement in 710-related issues, we have exhaustively researched multiple aspects of our region's transportation issues including pollution and health concerns, contemporary advances in freight movement, mass transit, traffic calming strategies and more. We support projects that are environmentally responsible and financially prudent, projects that will have benefit for the entire region. Since the proposed SR-710 Extension Toll Tunnels would not improve our regional mobility and air quality, but would actually worsen them, we recommend alternative solutions.

Objections to the RTP

We urge SCAG policymakers to **remove from the RTP all line items associated with expanding and extending the 710 freeway**, and remove from the RTP all items associated with expanding and increasing *existing* infrastructure and technology for goods movement in the region.

In addition, the No 710 Action Committee notes that SCAG must move the proposed SR-710 Extension Toll Tunnels from the Constrained Plan to the Strategic Unfunded Plan in the 2012 RTP because there are no committed, available, or reasonably available funds as required by federal law to include them in the Constrained Plan.

We oppose SCAG RTP items associated with proposed SR-710 Toll Tunnels because **they will increase pollution, truck traffic, congestion, accidents, health impacts and environmental risks in our communities and throughout the region**. We oppose related plan items which have the goals of increasing conventional roadway and rail yard capacity for the same reasons. The Programmatic Draft Environmental Report for the Plan is inadequate, as is stated in an addendum to this letter. These approaches are outdated, inefficient, and harmful to the region. **Better, zero-emission proposals for goods movement are available now – we should not wait another 20 years.**

Air Quality and Congestion

Goods movement proposals in the Draft Plan are inconsistent with regional, state, and federal air quality and congestion targets stated in the plan. The plan states that to attain federal ozone standards, the region will need broad deployment of zero and near-zero emission transportation technologies in the 2023 to 2035 timeframe (p.74). It also acknowledges that conventional goods movement practices contribute to excess ozone and poor air quality (p. 68), yet allocates billions of dollars to expanding existing systems, with no requirement that new technology be implemented.

The plan says that “truck-only freight corridors are effective as they add capacity in congested corridors, improve truck operations and safety..and provide a platform for the introduction and adoption of zero-emission technologies.” However, the plan does not require zero-emission technology (which truck operators will be reluctant to invest in because of the added expense), assumes and accommodates more trucks on the road en route to proposed freight corridors, and allocates billions to construction of these corridors instead of electrified rail freight movement projects which would eliminate many trucks from inner-city traffic altogether.

Health Impacts and Environmental Justice

The plan acknowledges environmental justice legislation at the federal and state level in detail and pledges SCAG’s compliance with the spirit of these laws. It proposes to address freight movement and rail emissions-related impacts, but it avoids mention of significant and sustained community opposition to the BNSF SCIG, which is on the Project List. The No 710 Action Committee opposes the SCIG in solidarity with the Coalition for a Safe Environment and other community groups that have repeatedly presented their comments and concerns related to environmental justice. These communities experience far higher than average freight truck traffic and host undesirable intermodal freight facilities. The resulting higher than average health, quality of life, life expectancy and safety problems are well documented. However, the existence of their concerns and specific objections to the SCIG are completely ignored and not mentioned in this Draft Plan or its appendix on Environmental Justice. The No 710 Action Committee repeats that SCIG and related Draft Plan components are part of an overall framework which favors conventional goods movement activities that cause significant pollution and negative impacts in neighboring communities and throughout the region.

Jobs

Job creation and retention goals in this Draft Plan represent “mission creep” and tilt towards requiring more trucks, more freeways, more traditional rail infrastructure, and more conventional port transfer and loading. We oppose this direction because it is part of a conceptual framework that includes the proposed SR-710 Toll Tunnels and the associated negative impacts mentioned above: pollution, truck traffic, congestion, accidents, health and environmental risks. The Port Working Group, a community coalition, has noted that the SCIG plan claims to add 400 permanent jobs, but existing businesses at the proposed site provide more than 1,200 permanent jobs, resulting in an overall reduction. Further, many of the construction jobs are not permanent, and not guaranteed to be awarded locally.

The No 710 Action Committee urges regional mobilization focusing on multi-modal transit and goods movement projects using electrified rail and zero emission technology. These will also create jobs, but the approach is forward-looking in terms of job and skills training and future infrastructure needs. In addition, more efficient, lower-cost goods movement technology will allow the Southern California region to attract jobs and new investment, competing effectively with other international and eastern seaboard ports’ expansion and modernization.

Zero Emission Technology

The plan refers to zero emission electrified rail technology as a long-term goal in sections of the report covering goods movement, congestion, air quality, transportation investments, and truck transport. It proposes a long-term, bureaucratic study. It does not acknowledge that specific patents, plans and technologies are currently being proposed and discussed by several parties. The Draft Plan indirectly and incorrectly implies that such technology cannot be implemented on an accelerated timetable. This is a matter of political will and private investment, not feasibility. The No 710 Action Committee objects to the Plan’s time-delay in funding and implementing zero emission strategies, because the near-term alternatives proposed in the Draft Plan include extension and expansion of freeways (such as the 710) and traditional rail yards and goods movement infrastructure which will result in added pollution, truck traffic, congestion, accidents, health and environmental risks in the region.

Funding

We question the revenue projections in the Draft RTP. The profitability of regional toll ways hasn’t been demonstrated, and the exact uses of the proposed SR-710 Toll Tunnels haven’t been determined (car only, truck only, both?) yet the SCAG RTP assumes a combined \$22.3 billion in revenues for the tunnels and other toll ways.

On the expense side, funding should be reallocated. The billions of dollars for freeway expansion, near-term dedicated truck lanes, the East-West Corridor, and conventional rail yard / truck loading should be spent on accelerated implementation of zero emission electrified rail freight movement and other multi-modal and active transportation projects.

The plan gives lip service to a modernized, zero emission freight movement system from ports to electrified rail, but allocates no funding for this important step that will dramatically reduce truck traffic and congestion, improve air quality and health/environmental impacts, and position this region as an efficient, low-cost, high-tech goods movement magnet.

The plan also admits that increased population, and a growing aging population, will need alternative forms of transportation as roads become more crowded in the region. More funding should be directed proportionally to active transportation: walking, biking, transit, and multi-modal planning. The No 710 Action Committee proposes that the SCAG RTP allocate a share of funding proportional to the anticipated users of and established needs for active transportation to foster

livable, sustainable neighborhoods throughout the region and meet AB32 and SB375 greenhouse gas emission goals.

Vision

Mobility, economy, and sustainability can all be advanced with the priorities and funding we propose. We urge SCAG to remove the SR-710 Tunnel from its Draft Plan, reject goods movement proposals that extend the last century's polluting and inefficient practices, and invest instead in forward-looking plans that will enhance the region's quality of life and economic prospects.

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Susan Bolan, La Crescenta

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Sam Burgess, Pasadena

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Janet Ervin, Alhambra

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Trisha Gossett, Highland Park

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Bill Graham, Burbank

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Clarice Knapp, South Pasadena

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Carol Teutsch, Los Angeles

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Don Smith, Long Beach

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Jan Soo Hoo, La Canada Flintridge

Jan Soo Hoo

Odom Stamps, South Pasadena

Odom Stamps

Sherry Stubbs, Glendale

Sherry Stubbs

Tom Williams, El Sereno

Tom Williams

Postscript and Addendum:

PEIR

Additional comments regarding the Draft Programmatic Environmental Impact Report (D-PEIR) shall be submitted separately and provide more detailed citations and comments which will demonstrate that the RTP as Project Description, Alternatives, and Mitigation sections of the PEIR, and the PEIR itself, are grossly inadequate and incomplete with regard to issues summarized below:

Summary Issues for 2035 RTP and RTP-Draft PEIR

1. Inadequate/Incomplete Project Description/Assessment for a Transportation Plan

Both the RTP and the PEIR are incomplete and totally inadequate as only selective forecasted 2035 traffic flows are provided in the main chapters and appendices which do not allow the public to fully review and evaluate the assessment of impacts. This is especially important for the evaluation of Freight Movements within corridors between the San Pedro Ports and the High Desert Corridor and Colton/Inland Empire Logistics Areas. Specifically more than 15 values for 2035 freight flows are missing from the I-710, I-5, and I-210 segments in Figure 2.7 and Goods Movements Appendix. Similarly no freight movement values are provide for connectors to the High Desert Corridor via I-15, SR-14, SR-138, and I-15.

Without these values the Projects listed for 2035 (e.g., SR-710 North Extension, East-West Freight Way (SR-60), SR-14, SR-138, etc.) cannot be properly confirmed, impacts assessed, and tolls-revenue generation evaluated.

Truck traffic is a major congestion factor on all RTP freeways in central LA County and must be modeled and results provided for independent assessment.

The High Desert Corridor truck destination/origins are not provided as little or no employment or housing or other land use parameters are not provided for such a large project.

2. SR-710 North Extension Project

The SCAG 2035 RTP assumes a route of the SR-710 along the old surface freeway route from the I-10 to the I-210, although Caltrans and MTA and the Technical Advisory Committee for the Project have already delineated a 150 sq mi study area which could easily change the entire basis for traffic modeling of freight movements through the central Los Angeles County road system. Such changes would have significant effect on modeled freight traffic levels.

Similarly the SR-710 TAC are conducting traffic modeling which specifically is different from results show in the RTP and have commented that the SCAG-RTP Traffic Model does not appropriately model the SR-710 conditions for 2035 and before.

3. Inadequate and Incomplete Port and Rail Facilities Descriptions and Alternatives

The 2035 RTP remains totally focused on road truck movement of freight between the San Pedro Ports and the High Desert Corridor and Inland Empire Logistics Areas. Alternatives are being submitted to both Ports of Long Beach and Los Angeles for a major increase of direct Ship<->Rail – on-dock/in-port transfer facilities with rapid turnarounds of ships and unit trains between the Ports and Logistics Areas which will promote a rapid increase in the Alameda Corridor, Alameda Corridor East, and the new Alameda Corridor North to the High Desert Corridor Logistics Area. Estimated 10+ unit trains/hr (3 lines x 24 x 10 = 720 unit trains/day) would travel from Ports to the two Logistics Areas.

The RTP and PEIR have an unstated assumption that transfer facilities near the Ports are required to transfer freight from sea containers or 40 ft to US rail/truck containers of 53 ft. However, ships are already being refitted for the longer US containers for both West Coast Ports and for Panama shipping. Such project changes would largely eliminate any transfers in the Port region or the Logistics Areas.

Other issues will address in comments directly for the PEIR. As they stand now, both the 2035 RTP and PEIR are inadequate, incomplete, in error, and unsupported by information accessible to the Public and perhaps between Caltrans/MTA and SCAG regarding the SR-710 and its role in the RTP from Los Angeles County.

**4. PEIR Jobs/Employment
Time and Totals
High Desert Corridor and Logistics Employees**

**5. Social Economics – Tolls/ETC. Revenue Generation and Costs
Constrained v. No Funding**

CC:

California Transportation Commission members
Glendale Mayor and City Council members
Glendale Transportation and Parking Commissioners
La Canada Flintridge Mayor and City Council members
Los Angeles Mayor and City Council members
Pasadena Mayor and City Council members
South Pasadena Mayor and City Council members
South Pasadena Transportation Manager
MTA Board members
State Assembly Representatives - northeast LA, Glendale, Pasadena, and La Canada Flintridge
State Senators – northeast LA, Glendale, Pasadena, and La Canada Flintridge
Members of Congress – 29th, 31st – 39th, 46th Districts
Crescenta Valley Weekly
Glendale News-Press
La Canada Valley Sun
LA Streetsblog
LA Weekly
Long Beach Press-Telegram
Los Angeles Times
Pasadena Sun
Pasadena Star-News
Pasadena Weekly
South Pasadena Review