



February 9, 2012

Mr. Jacob Lieb  
Ms. Margaret Lin  
Southern California Association of Governments  
818 W. 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

***Re: Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR)***

*Sent: Via e-mail ([rtp@scag.ca.gov](mailto:rtp@scag.ca.gov) and [2012PEIR@scag.ca.gov](mailto:2012PEIR@scag.ca.gov)) and via 1<sup>st</sup> Class Mail*

Dear Mr. Lieb and Ms. Lin:

On behalf of the Arroyo Verdugo Subregion, please accept these comments regarding the SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and associated Transportation Conformity Report and Draft Program Environmental Impact Report (PEIR), which were approved at the Arroyo Verdugo Steering Committee Meeting of February 6, 2012. It is important to state, out of respect for all of my colleagues on the Steering Committee, that the cities of Burbank and Pasadena abstained from all of these comments. However, the majority of the cities (Glendale, La Cañada Flintridge and South Pasadena) did approve these comments to be forwarded to you for review.

Our comments are as follows:

- 1. PURSUANT TO FEDERAL REGULATIONS, PROJECTS SHOULD NOT BE INCLUDED IN THE RTP/SCS CONSTRAINED PLAN, WHICH HAVE ONLY SECURED A SMALL PORTION OF THE REQUIRED FUNDING NEEDED TO COMPLETE THE PROJECT:**

The RTP/SCS, according to federal regulations, in “nonattainment and maintenance areas,” (which includes the area covered by the RTP/RCS) must “address the specific financial strategies required to ensure the implementation of projects and programs to reach air quality compliance” (23 CFR § 450.322 (b) (11) (part)). Projects which only have secured a small portion of the needed funding, and which rely on speculative funding, such as potential and/or possible tolling authority, should not be included in the RTP/SCS, since this inclusion does not meet the federal requirements for a fiscally constrained plan.

**2. LANGUAGE SHOULD BE INCLUDED IN THE RTP/SCS REQUIRING A FULL COST/BENEFIT ANALYSIS FOR ALL PROJECTS IN THE CONSTRAINED PLAN:**

Language should be included in the RTP/SCS that clearly states that a full cost/benefit analysis shall be completed for each project contained in the RTP/SCS constrained plan.

**3. SCAG SHOULD VIGOROUSLY PURSUE PROJECTS WHICH WOULD PROVIDE ENVIRONMENTALLY SUPERIOR ALTERNATIVES TO THOSE CURRENTLY IN THE PLAN IN ORDER TO BEST COMPLY WITH EXISTING ENVIRONMENTAL LEGISLATION:**

The PEIR states that: (1) *“Re-entrained roadway dust would increase proportionate to VMT. This would be a significant impact;”* (2) *“Impacts related to total GHG (Greenhouse Gas) emissions were determined to be significant even after mitigation.”*; (3) the PM10 Emissions Exhaust Only for Heavy Duty Trucks will increase (Table 3.2-4).; and (4) the *“Plan would result in a significant and unavoidable impact related to heavy-duty truck VHD [Vehicle Hours Driven], among other impacts.”*

SCAG should vigorously pursue projects under CEQA, the Clean Air Act, SB375 and AB 32 which would provide environmentally superior alternatives to those currently in the Plan, such as freight to rail mixed with additional transit. Additionally, sensitive receptors, such as schools and residences, must have adequate mitigation measures that satisfy these legal requirements.

**4. MAJOR HIGHWAY EXPANSION PROJECTS SHOULD NOT BE FRONTLOADED IN THE RTP/SCS:**

The RTP/SCS frontloads highway modalities by disproportionately allocating funding and anticipated completion dates. This is evidenced by comparing Table 2.2 - *Major Highway Completion Project* against Table 2.5, *Major Transit Projects*, in chapter 2 of the RTP/SCS. Transit projects are built in segments with the final project not being completed until 2030-2035. Expanding highways induces VMT and therefore frontloading major highway completion before transit projects does not comply with the tenets of SB 375 and AB 32 to reduce greenhouse gas emissions by reducing VMT. Additionally it is well documented that land uses adjacent to freeways are prone to increased toxins which cause negative health impacts.

According to SCAG staff, highway projects may be more easily financed than transit projects by borrowing against future toll revenues. They state that this is the reason the highway projects are frontloaded. This financial reasoning does not justify sacrificing environmental concerns by building the highway projects prior to transit projects.

**5. THE TERM “SR-710 GAP CLOSURE” USED IN THE PLAN SHOULD BE SUBSTITUTED WITH “710 NORTH EXTENSION”:**

The “SR 710 Gap Closure” language, already in the 2008 RTP, should be modified to consistency with Metro’s stated intent, which should serve to ease, if not eliminate, the current polarizing language. The shift in title from “710 North Extension” to “710 Gap

Closure” is invalid, since there is no gap. SR-710 terminates at Valley Boulevard. There is no northerly extension to connect to, since the portion of the 210 interchange including Del Mar Boulevard was built conditioned upon the fact that it “would have no effect on the decision as to the ultimate freeway location and will not foreclose alternatives to the proposed ultimate ...Freeway.” This title seems to create a sense of inevitability or priority for this project over competing ones and cannot be justified.

**6. SCAG ASSUMPTIONS REGARDING THE “SR-710 GAP CLOSURE” PROJECT PRODUCING CONGESTION RELIEF AND LOWER GREENHOUSE GAS EMISSIONS ARE FLAWED, BASED UPON EMPIRICAL RESEARCH ON OTHER HIGHWAY PROJECTS THAT HAVE BEEN BUILT:**

The PEIR states that “The Plan would increase VMT when compared to existing conditions.” (SCAG RTP/SCS p. 3.2-25). Specifically, decreasing VMT is the goal of SB 375 and should also be the goal of the RTP/SCS. The increase in VMT is the Plan’s reliance on freeway (whether tunnel freeway or above ground freeway) expansion to meet the region’s mobility needs. Notably, the RTP/SCS describes the SR-710 tunnel as a tunnel with 4 lanes in each direction. This is a major highway expansion being introduced into the region. To the extent that this causes the widening of other freeways (such as the I-210), it will further expand the freeway system. The region would be better served with an alternate project which is not highway oriented and which would potentially decrease VMT, rather than increasing it.

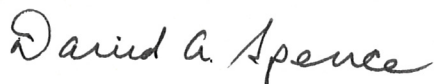
SCAG assumes that the SR-710 extension will produce congestion relief and lower greenhouse gas emissions. These assumptions are not borne out by recent research, and there are a host of other previous studies showing that an increase in highway capacity increases VMT and that once the project is built, congestion, within a few years, returns. These SCAG assumptions are flawed.

**7. THE DEFINITION OF THE SR-710 GAP CLOSURE PROJECT FROM ONE PRECISE POINT TO ANOTHER THREATENS PROGRAM-LEVEL CONFORMITY IN THE PLAN AND PREJUDICES FUTURE ENVIRONMENTAL ANALYSES:**

The Plan has modeled the SR-710 extension from one precise point north to another. Unfortunately, this assumption removes the low-build or multi-modal solution to the congestion problem. Under federal regulations, because of this specificity, the Plan and the PEIR threaten program-level conformity and prejudice future project-level environmental analyses.

Thank you for your careful consideration of our comments.

Sincerely,



David A. Spence  
Chair of the Arroyo Verdugo Steering Committee

c: Members of the Arroyo Verdugo Steering Committee