



**CITY COUNCIL**

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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 City Council of the City of La Cañada Flintridge, 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).

The City's 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. These cost benefit analyses should then be used, in an era of limited financial resources, to prioritize projects. A model for the cost/benefit analysis of every project in the RTP/SCS should be built and put into the Plan. The RTP/SCS should reflect this process and model in its language.

**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, at a minimum, satisfy or exceed 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 that 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.

In addition, this definition differs significantly from that used by the Los Angeles County Metropolitan Transportation Authority, which is currently conducting the EIR for the project and is the lead agency for the project. Metro says, *“We are beginning with a fresh perspective to initiate an environmental review process that will focus on a range of solutions to specifically evaluate the effects of the SR 710 gap. This process involves an education and public involvement program to seek both regional and community-based solutions that are suggested by you, your friends and family, your neighbors, and everyone else in your community. As our public involvement program name (SR-710 Conversations) suggests, the process for identifying these solutions will be through dialogue and conversation. These solutions from you can come in any possible form – from maintaining the status quo to considering new infrastructure, from single-modal to multi-modal approaches.”*

This project should not be characterized as a single solution. The solution to the congestion problem in the area of the proposed project should be multi-fold. It could include the Green Rail Intelligent Development (GRID) project, for example, along with better bus service, a multi-modal approach, a low-build option, better traffic light synchronization, a better intersection of the SR-710 and the I-10, or other projects.

The SCAG “project” should reflect the same process being currently used by Metro.

**8. THE SR-710 “GAP CLOURE PROJECT” SHOULD BE TAKEN OUT OF THE RTP/SCS ALTOGETHER DUE TO EMPIRICAL EVIDENCE OF HEALTH IMPACTS ON CHILDREN AND ADULTS ONCE THE PROJECT IS CONSTRUCTED:**

Dr. Rob McConnell, representing the USC Keck School of Medicine stated, “The increase in truck and automobile traffic on the I-210 freeway resulting from the proposed SR-710 extension would increase the exposure of surrounding communities to vehicular pollutants that may cause asthma and other respiratory diseases.” Supported by empirical research, USC has also stated that there is an “emerging scientific consensus that residential or school proximity to major traffic corridors is associated with respiratory impairment in children and in adults.” Further, it has been shown, in a 12-community Southern California study that a group of pollutants associated with residential proximity is a strong predictor of “debilitating lung disease and mortality in later life.”

The City of La Cañada Flintridge has twelve schools in close proximity to the I-210, which would likely be impacted by the “SR-710 Gap Closure” project. These schools existed prior to the freeway being constructed and would be adversely impacted in the worst possible way by increased vehicular pollutants.

The Preliminary Final Draft of a SCAG study, done for the Arroyo Verdugo Region, called the “SR-710 Missing Link Truck Study,” conducted by Iteris, Inc. Traffic Engineers, showed that there would be a 25% increase in daily traffic volumes on the I-210, that 30,000 incremental vehicles would go through the communities of La Cañada Flintridge, Pasadena, La Crescenta and Glendale, and that 2,500 of these would be heavy

duty trucks in peak hours (an incremental truck every four seconds). It can also be concluded from that study that 75% of local streets in the region, such as Fair Oaks Avenue, Fremont Avenue, Los Robles Avenue and Atlantic Boulevard would still be over capacity, as well as twelve arterial streets which would actually experience higher traffic volumes regionally as a result of the project. Additionally, the study showed that there would be more delay, gas consumption and air pollution as a result of the study (regionally). It can also be concluded as a result of the study that the system-wide, regional benefit would only be an increase of .6 miles per hour. Importantly, the study showed that motorists would still be driving farther and spending more time on the road if the tunnel is built.

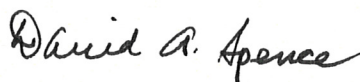
Regionally, a Metro study concluded that "in the peak (northbound) direction, the gap closure is projected to operate at LOS F..." This means gridlock in the proposed tunnel and idling at the portals, where congestion and air pollution already exist and should be alleviated rather than exacerbated.

The previously discussed SCAG conclusions that there would be lower greenhouse gas emissions and that congestion relief would be produced appear to lack foundation, in the face of one of its own studies, along with the others cited.

The City of La Cañada Flintridge wants to see the regional congestion problem resolved in a way that is the best solution for all stakeholders. We believe that this all-stakeholder congestion relief is possible, if you implement our comments, and particularly if you eliminate the "SR-710 Gap Closure" as the primary (if not the only) alternative in this particular region for congestion relief. Congressman Adam Schiff said, *"I believe the next logical step should be to consider a broad range of transportation options that might provide the same congestion relief and improvement in the quality of life for residents of the region at a cost equal to or lower than the amount Metro estimates it would take to build one of the five tunnel alternatives."* We concur with this statement.

Thank you for your consideration of our comments.

Sincerely,



David A. Spence  
Mayor

c: City Council Members, City of La Cañada Flintridge  
The Honorable Adam Schiff, Congressman  
Mark R. Alexander, City Manager