



CITY COUNCIL

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December 31, 2012

Mr. Ron Kosinski
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Re: City of La Cañada Flintridge's Comments on State Route 710 Study Draft Purpose and Need and Alternatives Considered.

Dear Mr. Kosinski:

The City of La Cañada Flintridge appreciates the opportunity to comment on the Draft Purpose and Need statement and the Alternatives Considered for the SR 710 Study ("Study"). The City provides these comments in its capacity as a Participating Agency pursuant to the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users ("SAFETEA-LU"). The City reserves the right to submit further comment and objections.

I. BACKGROUND.

Over the past thirty years, various purpose and need statements have been issued for the corridor. All have been mono-modal and all have been freeway centric, with stated purposes of relieving congestion, providing a north-south connecting link for the regional freeway system, and enhancing the opportunities for mass transit. Even the latter, however, is freeway centric, focusing on dedicated bus lanes. This contradicts SCAG's stated goals and objectives to provide a multi-modal solution to the region's transportation needs, as stated in the 2012 Regional Transportation Plan/Sustainable Communities Strategies.

While perhaps not as obvious, the current Draft Purpose and Need statement appears just as mono-modal and exhibits just as strong a freeway bias. Narrowing the purpose only to congestion and delay in a north-south direction improperly limits analysis and discussion of feasible alternatives, especially integrated multi-modal alternatives.

II. STUDY AREA.

We are pleased that the study area now appears to include all of La Cañada Flintridge, something omitted from the Notice of Preparation issued last year. However, while a stated purpose of the Project is to accommodate regional north-south traffic in the western San Gabriel Valley and east/northeastern Los Angeles, the Draft Purpose and Need statement makes implicit assumptions about impacts to the I-5 corridor between I-10 and I-210 that may or may not be correct. As such, Burbank and other communities along that corridor should also be included within the study area.

Additionally, as also noted below in Section III.B, Figure 5 of the Draft Purpose and Need statement includes communities to the northwest of La Cañada Flintridge along I-210, as well as cities to the south and east of the proposed study area, in its discussion of access to employment. This suggests that those communities and cities will also be impacted – good or bad – and must be included in a revised study area to determine and analyze those impacts.

III. NEED.

A. Insufficient Freeway Capacity.

Implicit in the discussion of congestion relief is that sufficient freeway capacity is attainable. While it may be attainable, it is at best a short-term phenomenon only. Under the theory of induced demand, “if you build it, they will come.” A substantial body of evidence exists that shows increasing highway capacity will induce additional growth in traffic, not just in redistribution of trips, but also through the generation of new trips. This ultimately leads to a deterioration of the level of service, casting doubt on the ability of simply expanding freeway capacity to solve congestion and capacity issues.

What induced demand theory does suggest, though, is that the purpose of adding freeway capacity to the SR 710 corridor is to shift congestion rather than solve the regional congestion problem. This, however, is not identified in the Draft Purpose and Need statement.

No one questions that, on a qualitative level, I-5 suffers from congestion. On a quantitative level, however, we caution against tying purpose and need too highly to SCAG projections. U.S. Census data for 2010 has shown many SCAG projections to be significantly overestimated. In the 2004 RTP SCAG projected the 2010 population of Los Angeles County to be 10,718,007 residents and the San Gabriel Valley subregion to be 2,065,918. According to the U.S. Census, though, the actual 2010 Los Angeles County population was 9,818,605, while the 2012 Pasadena Labor Market Profile pegged the actual 2010 San Gabriel Valley population at 1,795,781. This will certainly have implications for analysis, especially with respect to traffic and air quality modeling. SCAG itself has documented the weaknesses of its own demographic models, especially its inability to anticipate or respond to economic booms and busts.¹

B. Decrease in Accessibility of Employment Opportunities.

According to the Study, “one result of the inefficiency of the regional transportation [system] is a decrease in the accessibility of employment opportunities to residents in and near the study area.”² Accessibility to employment is as much a function of land use, however, as it is a function of transportation. Land use planning and transportation planning cannot be divorced from each other. That is exactly, though, what the Purpose and Need statement does by completely omitting the land use planning aspects.

¹ *Economic Recession and Population Projections in a Regional Planning Context*, Steven Choi, Ph.D., SCAG Department of Planning Methods, Assessment, and Compliance, January 7, 2010, presented to the 2010 Applied Demography Conference, San Antonio, TX.

² The inclusion in Figure 5 of the Study of numerous other communities such as Los Feliz, Burbank, Tujunga, Altadena, Irwindale, Diamond Bar, and Monterey Park suggests these communities will also be impacted by the Project and must be included in a revised study area.

Additionally, to the extent the underlying employment figures are based on SCAG projections, we offer the same caution as in Section III.A, above.

C. Interrelationship with the Local Street Network.

Section 3.3 of the Draft Purpose and Need statement identifies four short street segments (three of which are north-south) and asserts that 19% of the trips on these segments have both their originations and destinations outside the study area. The implication from this discussion is that for the entire study area, four out of every five non-freeway trips in the study area either originate or terminate in the study area.³ Most of the rest are presumably local trips that both begin and end in the study area. How many of those trips are on the arterial network?

That information will be necessary to properly analyze the impacts of feasible multi-modal alternatives. Changing some portion of those trips to a different mode could free up regional network capacity in a manner that reduces current congestion and provides sufficient capacity for future growth.

D. Out-of-Direction Travel.

Some degree of out-of-direction travel exists in every network because of virtually limitless combinations of origins and destinations. Limited access freeways cannot address every link and no evidence has been presented that the amount of out-of-direction travel in the San Gabriel Valley is disproportionate to that experienced in similar urbanized regions.

Use of El Monte to Pasadena and City Terrace to Pasadena as examples of problematic out-of-direction travel are red herrings. Aside from the fact that there is no evidence of an overwhelming need for a direct link from El Monte to Pasadena, construction of SR 710 would result in approximately the same freeway distance between the two as without SR 710. Additionally, Pasadena to City Terrace – 6 miles – is not a regional trip. It is a local trip for which surface street travel is far more likely appropriate. Indeed, SR 710 might induce demand, with longer trips and greater VMT, to take advantage of any new freeway.

E. Movement of Goods.

The lack of any discussion in the Draft Purpose and Needs statement of regional north-south movement of goods is puzzling. This has previously been advanced as a justification for the Project. Substantial public discussion has centered on the perceived need to provide a route that allows trucks to avoid existing congestion on I-5 as goods are transported between metropolitan Los Angeles and points north.⁴ Yet, the Draft Purpose and Needs statement is silent to this issue.

Any suggestion that truck traffic would not use I-210 and I-710 to avoid the congestion of I-5 runs counter to common sense. Time, as much if not more so than distance, is a key variable in the movement of goods. Again, if you build it, they will come.

³ We additionally note that the phrase in Section 3.3 “trips on these roadways that have both origins and destinations outside the study area” is unclear. Is this referring to round trips, a single leg, or both? This information would appear necessary to properly analyze the feasibility of various alternatives.

⁴ See, e.g., *I-710 Missing Link Truck Study, Traffic Analysis for the Arroyo Verdugo Subregion With and Without the I-710 Gap Closure*, SCAG (Iteris), May 2009.

IV. PURPOSE.

The purpose of the Project (Section 4.0) is drawn too narrowly, especially in the context of the needs and justifications provided in Sections 3.0 to 3.5. Its focus is north-south travel demands to the exclusion of all others and places primary emphasis on the regional freeway system.

As a result, the Purpose and Needs statement overly restricts the scope of the analysis and consideration of alternatives. It simply does not address mobility issues throughout the entire study area, let alone the entire area of impact. The City remains concerned that Project objectives have been drawn and will be interpreted so narrowly so that only a freeway can fulfill those objectives, in contravention of both the California Environmental Quality Act (“CEQA”) and the National Environmental Policy Act (“NEPA”).

While it might be considered implicit, cost effectiveness needs to be *explicitly* incorporated into the statement of purpose. We have previously commented that a cost-benefit analysis of the Project must be conducted early in the CEQA/NEPA process.⁵

Cost effectiveness must be evaluated not just in terms of moving vehicles and VMT, but in terms of moving people. For example, can light rail move more people at less cost per person-mile than a freeway tunnel? How much TSM/TDM or light rail can be built for the same price as a freeway tunnel? Would it serve more people?

Cost effectiveness also includes total cost and source of funds for the Project. To date, though, MTA has made no serious attempts to provide accurate financial data with true costs of the Project available for public review.

V. ALTERNATIVES.

The environmental documentation for the Project must include an analysis of a reasonable range of alternatives. The failure to offer any truly integrated multi-modal alternative prevents that requirement from being met.

Why would TSM/TDM be included in the BRT and LRT alternatives, in addition to standing on its own, but not in the freeway and highway alternatives?

While TSM/TDM is included in two of the alternatives, the emphasis still appears to be that of mono-modality. None of the alternatives is truly multi-modal. In that respect, we look toward the Westside Mobility Plan, a project of the City of Los Angeles.⁶ While it contains elements that may not be relevant here, such as a parking study, it still represents a much more integrated multi-modal approach that also recognizes the effect of land use decision making on transportation planning.

5 Correspondence from Mayor David Spence to Ron Kosinski re: *City of La Cañada Flintridge’s Comments on Notice of Preparation and Scope of Environmental Impact Report/Environmental Impact Statement PM 26.7/32 Stae Clearinghouse No. 1982092310 – 710 Gap Closure*, April 14, 2011.

6 <http://www.westsidemobilityplan.com/wp-content/uploads/2011/11/Westside-Mobility-Project-Fact-Sheet.pdf>.

There is no discussion of tolls as a component of a multi-modal alternative. Tolls and congestion pricing have the potential to decrease volumes and increase the efficiency of existing regional freeway networks. They also have the potential to minimize environmental impacts related to mobile sources when compared to new construction.

Not only are the alternatives offered for consideration woefully inadequate as a matter of substance, they are not of the same financial magnitude as the Project. The alternatives that are ultimately analyzed should have capital costs equivalent to the Project.

As we have noted, a cost-benefit analysis must be conducted for the Project. A similar analysis must also be conducted for the alternatives. To determine the true benefits of both the Project and the alternatives, the benefit must be evaluated in terms of moving people, not just moving vehicles.

VI. CONCLUSION.

While it is cast as an "alternative," it is abundantly clear that the freeway tunnel alternative is the Project. The environmental review process in which MTA is engaged has been excessively focused on the tunnel option. It had done so, though, without any serious discussion of cost – not just the true cost of the Project itself, but cost in comparison to other regional transportation projects that have gone or will go begging and resources are diverted to the Project. This confirms what many already suspect. MTA has preordained the Project and is now searching for *post hoc* rationalizations to justify its decision.

Thank you for your consideration of these preliminary comments and objections. Please ensure that we are provided with advanced written notice of any and all meetings, hearings, actions and votes related to this matter. Please contact us with any questions or comments.

Sincerely,



Stephen A. Del Guercio, Mayor

cc: The Honorable Laura Olhasso, Mayor Pro Tem
The Honorable Donald R. Voss, Council Member
The Honorable Michael T. Davitt, Council Member
The Honorable David Spence, Council Member
Mark R. Alexander, City Manager
The Honorable Michael D. Antonovich, Chair, and Directors, Metro Board
The Honorable Mayor, City Council Members and City Manager, City of Glendale
The Honorable Mayor, City Council Members and City Manager, City of Burbank
The Honorable Mayor, City Council Members and City Manager, City of Pasadena
The Honorable Mayor, City Council Members and City Manager, City of South Pasadena
Altadena Town Council
La Crescenta Town Council