

**R-9**

**CORRESPONDENCE - SALLY KILBY**

From: "Sally Kilby" <SKilby@ci.south-pasadena.ca.us>  
To: <pablo.rubio@longbeach.gov>, <cityclerk@longbeach.gov>,  
Cc: "Sergio Gonzalez" <SGonzalez@ci.south-pasadena.ca.us>, <djimenez@ci.south-pasadena.ca.us>  
Date: 09/30/2013 03:57 PM  
Subject: Materials related to 710 issue being taken up by the City Council 10/1/13

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Pablo: Please forward these materials to the City Council prior to tomorrow night's Council meeting (Item #9).

Dear City Council:

As you consider the 710 item on Tuesday night, the South Pasadena City Council would like you to have the attached documents for review and consideration. Resolution No. 7172 is the South Pasadena City Council's latest official position on the SR-710, and the other documents demonstrate the City's continuing dialogue with transportation agencies on various aspects of the project.

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**RESOLUTION NO. 7172****A RESOLUTION OF THE CITY COUNCIL  
OF THE CITY OF SOUTH PASADENA, CALIFORNIA,  
RE-AFFIRMING THE CITY'S OFFICIAL POSITION  
ON THE STATE ROUTE 710 FREEWAY EXTENSION,  
SUPPORTING MULTI-MODAL ALTERNATIVE,  
AND RESCINDING RESOLUTION NO. 7171**

**WHEREAS**, for nearly sixty years, Caltrans has proposed freeway routes that impose unacceptable impacts on and irreparable harm to the City of South Pasadena and other cities, and the South Pasadena City Council has consistently and vigorously opposed proposed State Route 710 (SR-710) North extensions; and

**WHEREAS**, the City of South Pasadena and the National Trust for Historic Preservation, the Sierra Club, Natural Resources Defense Council, the Trust for Public Land, the Environment Defense Fund, California Public Interest Research Group, Friends of the Earth, Taxpayers for Common Sense, and others are on record in favor of a Multi-Mode transportation solutions, a thoughtful and much-needed conceptual regional transportation plan designed by a nationally-renowned transportation engineering firm, with the input of a broad based coalition of environmental, historic preservation, neighborhood, grass-roots organizations and citizens within South Pasadena and other cities, to improve travel within the region and to protect the environment and relieve traffic congestion, provide jobs, preserve affordable housing, and to save historic neighborhoods, and could now be updated and expanded to include measures beyond the immediate corridor that vitiate the need for any form of freeway extension; and

**WHEREAS**, the following public officials and reports have all declared that the surface route 710 extension will never be built because of its unacceptable environmental impacts: former Southern California Association of Governments (SCAG) executive director Mark Pisano while in office; former Department of Transportation (Caltrans) District 7 Director Doug Failing, who is now on Metropolitan Transportation Authority (Metro) staff; Alhambra city official Barbara Messina; Senator Gil Cedillo; Assembly Member Michael Eng, and legislative committee reports; and

**WHEREAS**, while SCAG removed the surface route 710 North Extension from the regional transportation plan, it wrongfully included as a constrained project a bored tunnel (tunnel) to extend the state route (SR) 710 freeway from its northern terminus at Valley Boulevard in the El Sereno community of the City of Los Angeles to the 210 freeway in the City of Pasadena, despite the failure of the tunnel to meet the federal criteria of a constrained project; and

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**WHEREAS**, despite South Pasadena's persistent requests, neither Caltrans nor the state administration will officially remove the SR-710 North surface extension from the Streets and Highways Code (even though the Legislature enrolled SB 545 to that effect), or otherwise stipulate in *South Pasadena v. Slater* in the United States District that the surface freeway will not be considered in future action; and

**WHEREAS**, despite the requirement from the Federal Highway Administration in its record of decision on the freeway that there be an analysis of the effectiveness of interim improvements in the freeway corridor before considering the freeway extension, no such analysis has been conducted; and

**WHEREAS**, the City's 2003 resolution reiterating its opposition to a freeway but stating that it did not oppose sound research evaluating a tunnel produced no cooperation from state and regional authorities to meet the city's need for removal of the surface route and release of Caltrans-owned properties whose surface estates are no longer needed; but has instead produced a series of unwarranted efforts to accelerate tunnel approval and funding in advance of the required sound research and environmental assessment, while tunnel proponents have misstated the City's position, producing unwarranted distrust of the City Council among South Pasadena citizens; and

**WHEREAS**, since the City's 2003 resolution, two reports have been presented, the latest of which proposes that a tunnel is geotechnically feasible in five possible corridors; neither of these reports, however, answered the basic questions of this alternative's benefits and costs, both social and fiscal; and

**WHEREAS**, Metro included \$780 million for an SR-710 tunnel in Measure R, the sales tax initiative that passed in November, 2008, and has since increased the amount to \$1.18 billion, although this would be only a small portion of the cost of the tunnel, which has been subject to cost estimates of up to \$11.8 billion; and

**WHEREAS**, there have been conflicting reports with regard to the use of, or the need for, the proposed tunnel alternative, with Caltrans emphasizing commuter and street congestion relief with no truck traffic diversion from Route 5, even though this was an early freeway objective, while the recent legislative efforts (SB 545) emphasized goods movement, and a SCAG draft study projected that completion of a 710 tunnel would greatly increase the number of trucks traveling up the 710 freeway and east on the 210 freeway; and

**WHEREAS**, tunnel proponents propose that a tunnel be constructed in a public/private partnership (PPP) and that the tunnel be operated as a toll facility that would primarily serve truck traffic emanating from the Ports of Los Angeles/Long Beach; and yet several privately-funded toll roads in Southern California have become insolvent

or resulted in bankruptcy, requiring further public investment exceeding that originally envisioned for such projects; and

**WHEREAS**, public health studies show that persons living near freeways and tunnels are exposed to an increased risk of illness and death; in 1998 the former Regional Administrator of the United States Environmental Protection Agency questioned the air quality benefits of the proposed freeway extension; responsible studies show that new freeways actually induce traffic (including traffic on adjacent surface streets) in the long run; and safety concerns would likely require that the design of a tunnel include emergency exits; and

**WHEREAS**, The Clean Air Act, which was last amended in 1990, requires EPA to set National Ambient Air Quality Standards (40 CFR part 50) for pollutants considered harmful to public health and the environment of which the South Coast Air Basin is not in attainment. This region must come into compliance with the following air quality standards by the dates that follow or the region may jeopardize transportation funding:

***Fine Particulates (PM2.5)***

- **2014** (annual average standard)
  - **2019** (24 hour average standard)
- Emissions that must be reduced include:
- Nitrogen Oxides
  - Sulfur oxides
  - Directly-emitted particulates

***Ozone***

- **2023**
- Emissions that must be reduced include:
- Nitrogen Oxides
  - Hydrocarbons

**WHEREAS**, Caltrans has not properly maintained the hundreds of houses that it owns in the previously adopted freeway corridor, and their continued ownership of these houses is contrary to the interests of the cities in which the houses are located and the residents of the houses alike; and

**WHEREAS**, Caltrans expresses a desire to be out of the landlord business, and the State is now putting many of its public properties up for sale, but the State refuses to release the surface estates in the more than 500 properties it has owned for more than 40 years in the now-abandoned 710 surface freeway project corridor; and

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**WHEREAS**, many needed transit projects now in Los Angeles County serve the interests of the region better than a 710 tunnel, which if built, is currently projected not to be completed until 2030; and conducting environmental review of the proposed tunnel would cost an estimated \$30-40 million, which could better be spent elsewhere; and

**WHEREAS**, the cities of Glendale and La Cañada Flintridge oppose construction of a 710 tunnel project, and the City of Los Angeles opposes it within its jurisdiction.

**NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SOUTH PASADENA, CALIFORNIA, DOES RESOLVE, DECLARE, DETERMINE AND ORDER AS FOLLOWS:**

**SECTION 1.** The South Pasadena City Council does hereby rescind Resolution No. 7171 which contained the City's official position on the SR-710 North Extension.

**SECTION 2.** Until and unless adequate environmental review shows to the contrary, the South Pasadena City Council does hereby oppose any proposal, surface or subsurface, to extend the SR-710 freeway from Valley Boulevard in the City of Los Angeles to the 210 freeway in the City of Pasadena, and instead wholeheartedly supports further development of a fiscally and environmentally responsible alternative, that includes elements of a Multi-Modal transportation system.

**SECTION 3.** Until and unless adequate environmental review shows to the contrary, the South Pasadena City Council determines that any extension of the SR -710 North Extension is not worthy of further consideration for a number of reasons: any extension would not reduce congestion in the corridor; it would create significant adverse health impacts on, and possible community disruption to, South Pasadena residents; and the extension's costs would be disproportionately high and not justified in light of other competing transportation and social needs.

**SECTION 4.** The South Pasadena City Council reiterates its support for further development and implementation of elements of a Multi-Modal Alternative that includes but is not limited to an integrated comprehensive network of efficient light-rail, heavy-rail, bus and bicycle systems throughout the San Gabriel Valley, including connections to Ontario International Airport and the Burbank/Glendale/Pasadena Metro Airport. We direct staff to work with other jurisdictions to fund an update of this Multi-Modal Alternative and to submit it to the Federal Highway Administration, Caltrans, and Metro. We further request that this alternative be pursued by the Governor, the California State Legislature, SCAG, Caltrans, Metro and others rather than an extension of the SR-710 North.

**SECTION 5.** Recognizing that Proposition R specifies that \$780 million is to be allocated to a 710 tunnel, and that Metro staff will likely recommend that its governing board authorize an Environmental Impact Report on a tunnel, and recognizing that such a study would be extremely costly, the South Pasadena City Council requests Metro and Caltrans to instead contract with an independent research organization, agreed upon by stakeholders in the corridor of the proposed SR-710 North Extension, to conduct a comparative cost-benefit study of the tunnel versus an updated Multi-Modal Alternative that would rely upon transit and mobility improvements.

**SECTION 6.** The South Pasadena City Council requests that the Governor of California, the California State Legislature, SCAG, Metro, Caltrans, and others work with the City of South Pasadena, the City of Pasadena, and the El Sereno representatives of the City of Los Angeles, and others, to implement a plan for complete and final elimination of the surface freeway alternative, and sale of the surface estate in the corridor.

**SECTION 7.** The South Pasadena City Council wholeheartedly urges other San Gabriel Valley Cities to support the self determination rights of all cities by supporting enactment of a repeal of Section 100.4 of the California Streets and Highways Code, as proposed initially in AB 353.

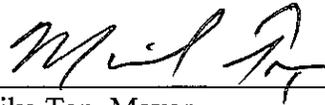
**SECTION 8.** Taking full advantage of the opportunity to forever remove the possibility of a surface SR-710 Freeway Extension through South Pasadena, upon reintroduction of legislation that conforms to AB 353 as introduced by Assembly Member Cedillo, and with anticipated enactment of that legislation, the South Pasadena City Council will actively participate in the environmental review process for all other alternatives to the surface freeway in that environmental review, and will withdraw any opposition to Caltrans and Metro proceeding with the environmental review process.

**SECTION 9.** Staff is directed to distribute this resolution to all interested parties and urge other cities, elected officials, regional agencies and organizations to support elements of a Multi-Modal transportation system.

**SECTION 10.** This resolution shall become effective immediately upon its adoption.

**SECTION 11.** The City Clerk shall certify to the passage and adoption of this resolution and enter it into the book of original resolutions.

**PASSED, APPROVED AND ADOPTED ON** this 20<sup>th</sup> day of July, 2011.

  
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Mike Ten, Mayor

**ATTEST:**

**APPROVED AS TO FORM:**

  
\_\_\_\_\_  
Sally Kilby, City Clerk

  
\_\_\_\_\_  
Richard L. Adams II, City Attorney

**I HEREBY CERTIFY** the foregoing resolution was duly adopted by the City Council of the City of South Pasadena at a regular meeting held on the 20<sup>th</sup> day of July, 2011, by the following vote:

**AYES:** Cacciotti, Putnam, Schneider, Sifuentes and Mayor Ten

**NOES:** None

**ABSENT:** None

**ABSTAINED:** None

  
\_\_\_\_\_  
Sally Kilby, City Clerk

**CHATTEN-BROWN & CARSTENS**

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September 20, 2012

Ronald Kosinski  
Caltrans District 7, Division of Environmental Planning  
100 South Main Street, MS 164  
Los Angeles, CA 90012

Re: I-710 Corridor Project Draft Environmental Impact  
Report/Environmental Impact Statement

Dear Mr. Kosinski:

On behalf of the City of South Pasadena, we provide these comments on the Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS) for the I-710 Corridor Project.

South Pasadena has been involved in issues related to the 710 (SR-710 and I-710) for decades. In April 2011 we submitted a letter regarding the scoping of the Proposed EIR/EIS on what you refer to as the "State Route 710 North Gap Closure Project" (hereafter referred as the "SR-710 North Project").

South Pasadena's primary concern is the devastating impact the SR-710 North Project could have on South Pasadena and the surrounding communities. However, the City and its residents are also very concerned that limited public resources be expended in a way that most cost effectively increases mobility throughout the entire Southern California Association of Government (SCAG) region. Therefore, any analysis of the effects of the I-710 Corridor's substantial increase in the capacity of the 710 at its southern portion must include an analysis of how those capacity increases could affect the northern portion and how those impacts can best be reduced or eliminated.

Together, the SR-710 North Project and the I-710 Corridor Project would encourage increased use of the I-710 freeway as a conduit for port cargo if the SR-710 North Project is a single highway, whether above or below ground, rather than a multi-modal alternative to increase mobility in the San Gabriel Valley and elsewhere in the region. The California Environmental Quality Act (CEQA) requires that the direct and cumulative impacts of these projects – traffic, air quality, health impacts on communities through which the 710 freeway passes,

and more – be assessed together. “‘Cumulative impacts’ refer to two or more individual effects which when considered together, are considerable or which compound or increase other environmental impacts.” (Title 14, Cal. Code Regs. (CEQA Guidelines) § 15355.) “Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.” (*Ibid.*)

The cumulative impacts of the I-710 Corridor and SR-710 North improvements are likely to be significant and must be adequately considered in each EIR/EIS for each project. The Regional Transportation Plan modeled and included a tunnel for the SR-710 North Project, and also includes the I-710 Corridor project to expand capacity at the southern portion of the freeway. This supports the conclusion that there will be cumulative impacts from the two projects together that must be carefully considered.

The cumulative impacts section of the I-710 Corridor Project Draft EIR (DEIR) identifies the SR-710 North Project as a related project but then states: “Cumulative impacts [are] not identified at this time, but impacts as a result of this [SR-710 North] project may include geotechnical, erosion, hydrology, air quality, water quality, noise, biology, public utilities, vehicle traffic patterns, parking, land use planning and hazardous waste.” (DEIR, p. 3.25-5.) The DEIR claims “There are no adverse growth-related effects of the build alternatives; therefore, no avoidance, minimization, and/or mitigation measures are required.” (DEIR, p. 3.25-40.) However, contrary to this claim, increasing capacity at the south end of the I-710 freeway may very well result in additional traffic, including truck traffic, traveling north on the 710 to the I-210 freeway, and from the I-210 back south. Both EIRs must include a detailed analysis of the amount of increased traffic that may result from the synergistic effect of the two projects.

The increased traffic must be quantified as best as is possible with modeling because the construction of the two projects could compound or increase the adverse impacts from each. To address such impacts, the I-710 Corridor assessment should also emphasize alternatives to the preferred project in the EIR, such as fully using the Alameda Corridor and Alameda Corridor East rather than relying on 710 capacity increases.

A multi-modal alternative for the SR-710 North Project that does not include a freeway or a roadway tunnel could avoid many types of cumulative impacts. It bears emphasizing that the Cities of Glendale, La Canada Flintridge, and Los Angeles have stated their opposition to a surface or tunnel route for the SR-710 North Project. The City of Pasadena has stated its opposition to two proposed tunnel routes and two surface routes. Again, South Pasadena urges that a multi-modal alternative that does not include a freeway or a roadway tunnel be

Ronald Kosinski  
Sep. 20, 2012  
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identified as the preferred project for the SR-710 North.

### **Conclusion**

We urge you to revise the DEIR/DEIS for the I-710 Corridor Project so that consideration of the potential cumulative impacts of the I-710 Corridor Project along with the impacts of the SR-710 North Project are not overlooked. The cumulative impacts of the two potential projects together must be acknowledged and analyzed in adequate detail. The mobility of the entire region is too important to be considered without an understanding of the cumulative effect of these two major projects.

Thank you for your consideration of these views.

Sincerely,



Douglas P. Carstens



## CITY OF SOUTH PASADENA

OFFICE OF THE CITY COUNCIL  
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TEL: 626.403.7230 FAX: 626.403.7211

January 9, 2013

Ron Kosinski  
Deputy District Director, Environmental Planning  
Caltrans District 7  
100 South Main Street Suite 100  
MS 16A  
Los Angeles, CA 90012

### Re: SR- 710 Study Draft Purpose and Need

Dear Mr. Kosinski;

The South Pasadena City Council would like to comment on the November 8, 2012, draft Purpose and Need for the State Route 710 (SR-710) Study Area prepared by the California Department of Transportation, District 7, Division of Environmental Planning (CalTrans). In summary, we find that the "Purpose and Need" statement does not sufficiently articulate either purpose or need, but instead is a series of observations of existing conditions and a selective hypothesis about future conditions. The hypothesis extended is that:

*The lack of continuous north-south transportation facilities in the study area affects the overall efficiency of the larger regional transportation system, causes congestion on freeways in the study area, contributes to cut-through traffic that affects the local streets in the study area, and results in poor transit operations within the study area.*

- State Route 710 Study Draft Purpose and Need, Nov. 8, 2012, page 5

This deceptively simple "needs" statement posits causal relationships between a perceived shortage of north-south facilities and observed outcomes of inefficient operations, congestion, cut-through traffic and poor transit service but provides no factual association of **cause and effect**. The causes of these conditions are, of course, multi-dimensional, and any proposed new facility could only partially—and temporarily—relieve these conditions, but this long view is reflected neither in the statement nor in the analysis.

The real need facing the San Gabriel Valley is to invest limited transportation resources wisely to provide sustainable, reliable, and efficient transportation improvements capable of responding to and supporting the current and projected growth of the region.

The comments that follow summarizes the concerns we have about the needs identified and claims made in the Need and Purpose that are the foundation for the definition of need for which closing the alleged “freeway gap” is assumed to be a significant and sustainable solution. Equally troubling are the unstated and unaddressed needs of the region and the overt, and suspicious, lack of transparent discussion regarding freight and goods movement.

## **Background**

In spring 2012, the City of South Pasadena agreed to act as a Participating Agency for the SR-710 Study process. The Draft Purpose and Need statement was circulated to agencies on November 8, 2012, in advance of the first Section 6002 Coordination Meeting scheduled for December 7, 2012.

The study area addressed in the purpose and need encompasses roughly 100 square miles east and west between the I-5/SR 2 and I-605, and north and south between I-210 and I-10. The area currently has 1.18 million residents and 450,000 jobs and is estimated to grow by roughly 10% in both population and employment over the next 25 years.

At least three separate purpose and needs statements have been articulated for this corridor in the past 40 years. In 1976/77, the purpose identified was to accommodate and enable the growth of traffic in the region. The purpose and need in the 1980s and early 1990s boiled down to a purpose to build a highway in response to the need to fill a highway preserved “gap” on a map. Although this purpose and need statement identifies a broader set of needs, the selective data and information presented is clearly biased toward the same objective of constructing a highway solution.

## **Stated Purposes and Needs**

### **Need 1: Insufficient capacity in the regional network**

One of the most troubling aspects of the report is the naïve assumption, without any acknowledgement of research to the contrary, that sufficient freeway capacity is an attainable or desirable goal. Only in regions of stagnant or declining economic productivity has this been achieved. The report makes no mention of induced demand or induced travel—a result that even national experts conclude is an increase in total daily travel over an entire transportation system that results from a change in system capacity.<sup>1</sup> A recent and extensive study utilizing FHWA data concluded that new or expanded interstate facilities correlate with VMT **increases** nearly on a one for one percentage basis. Further, researchers concluded that this increase is above and beyond VMT that shifts from alternative routes or other modes.<sup>2</sup> This raises clear concerns about the ability to solve for insufficient highway capacity by expanding freeway<sup>3</sup> capacity.

It is true that I-5 is the regional backbone, and that it suffers from congestion. Connecting the SR-710 to the 210 will enable a shift in some of that regional traffic from I-5 to the 210. The chief benefit of this project is likely to be balancing congestion between the I-5 and the 210—though

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<sup>1</sup> “Build it and They Will Come?” *The Region*, National Capital Region Transportation Planning Board, Vol 41, 2002, pp.21

<sup>2</sup> Duranton, Gilles, and Matthew A. Turner. 2011. “The Fundamental Law of Road Congestion: Evidence from US Cities.” *American Economic Review*, 101(6): 2616–52.

<sup>3</sup> “Clean Air Issues Put Transportation Planning Process on Hold” *The Region*, National Capital Region Transportation Planning Board, Vol 41, 2002, pp. 10-15

unable to ever solve congestion. However this “purpose” is never overtly stated. It should be plainly articulated if indeed the shifting of additional traffic to an eastern alignment is the overriding intent of the project. Failure to do so undermines the ability for meaningful stakeholder coordination and public review and comment.

The report cites an unusually long distance between freeway facilities as yet another indication of deficiency in the regional network, but again provides no evidence of a causal relationship to any of the problems to be solved.

The United States Department of Transportation generally assesses capacity by highway miles per 10,000 people. While Los Angeles does indeed rank low by this measure at just 4.73 and Houston is near the top at 9.54 miles of highway per 10,000 people, this seems not to correlate to quality of commute given that even while having an abundance of highways, it still ranks below LA, according to the business journal Forbes.<sup>4</sup>

### **Need 2: Cut-through trips on the local network**

The report finds that 19% of the local arterial trips made within the study area have neither origin nor destination within the study area. This is not at all unusual in metropolitan regional networks for many urban arterials. How does 19% non-local traffic compare to other arterials in the urban portions of the LA Basin, such as Santa Monica Blvd, Wilshire Blvd, Topanga Canyon Blvd or Laurel Canyon Blvd? A study of the New York Avenue corridor in Washington found that one-third of the trips on that arterial had neither origin nor destination within the 64 square miles of the District of Columbia,<sup>5</sup> where in fact capacity was available on alternate interstate or freeway routes.

As interesting as this statistic is, it is not particularly meaningful. The report has not demonstrated that if new north-south freeway facilities were constructed that these regional trips would no longer use the local network.

A more interesting data point would be how many trips on the regional (e.g., highway and freeway network) have **both** origin and destination within the study area. These sub-regional trips provide the best opportunity for alternate commutes—either by mode, time of day, and/or route selection. Providing improvements that meet the local travel needs of a modest number of these local freeway trips—even just 5% to 10% of the total—would create sufficient capacity in the regional network to relieve current congestion **and** accommodate future projected growth. Yet data on this point is not provided and appears not to have been considered in the statement of need.

### **Need 3: Limited future access to jobs**

The Draft Purpose and Need posits that, “One result of the inefficiency of the regional transportation is a decrease in the accessibility of employment opportunities.”<sup>6</sup> In fact, the chief limitation in access to jobs is not inefficient transportation, but inefficient land use. However, no

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<sup>4</sup> Woolsey, Matt. “Best and Worst Cities for Commuters” *Forbes.com* April 5, 2008  
[http://www.forbes.com/2008/04/24/cities-commute-fuel-forbeslife-cx\\_mw\\_0424realestate.html](http://www.forbes.com/2008/04/24/cities-commute-fuel-forbeslife-cx_mw_0424realestate.html)

<sup>5</sup> *New York Avenue Corridor Study*. District Department of Transportation. 2006

<sup>6</sup> SR 710 Study Draft Purpose and Need, November 8, 2012. Pg. 7

mention is made of the interrelated nature of land use and transportation. As the adage goes, the best transportation plan is a good land use plan.

But apart from this gross omission, the information that is provided is misleading. It assumes that the average travel time to work (25.3 minutes in 2010) will remain the average commute time in 2035, the horizon year for new jobs in the area. The projected travel time should be used as the measure of accessibility just as the projected employment growth is.

It also fails to recognize that Los Angeles enjoys a relatively short commute relative to its other comparable big city, New York (at 31.2 minutes).<sup>7</sup>

Access to jobs and opportunity is most definitely a need in the San Gabriel Valley, but this need is not adequately addressed by the alternatives being considered to address this purpose and need. There are several high employment and activity centers in the Pasadena and Alhambra areas that require greater multimodal accessibility. California State University – Los Angeles is home to more than 20,000 undergraduate and post graduate students, while Pasadena City College serves nearly 40,000 credit and non-credit students, many of them commuters. Both employ thousands of faculty and staff. East Los Angeles College (30,000 students), Azusa Pacific University (10,000 students), California Institute of Technology (approximately 4,000 students, faculty and staff), Huntington Hospital (625 beds) are all significant job and educational centers not adequately addressed by the mono-directional focus of the alternatives considered to date. In addition the general area includes the Art Center College of Design (approximately 2,000 students), USC Keck School of Medicine in Pasadena and Alhambra, Glendale Community College, the Claremont Colleges, such vocational schools as DeVry, and many other institutions. We concur that future access to jobs and activity centers is a vital need, and with so many jobs and opportunities in the valley, it is an expectation that the alternatives provide greater access to these activity nodes.

The Los Angeles County Department of Public Works, which is located in Alhambra, employs approximately 1,600 employees and receives hundreds of visitors each week. The Los Angeles Department of Community Development employs 500 employees and also receives hundreds of visitors each week. Due to the infrequent bus schedule in these areas, the facilities are accessible primarily by automobile. A good way to reduce traffic in this area would be to expand mass transit for visitors and employees, and this would clear the streets of parked vehicles.

#### **Need 4: Significant out-of-direction travel**

The statement asserts that there is a disproportionate amount of out-of-direction travel occurring in the LA basin. In fact, however, the built freeway system actually provides the most direct routes along the primary development axis of the region—the east-west alignment between San Bernardino and Santa Monica (provided by I-10, 210, and 60) and the southeast to northwest alignment between Irvine and Santa Clarita (provided by the 405, I-5, and 170). The direct north-south connection provided by an extension of SR-710 would be little more than a truck by-pass around the most congested portions of the I-5. The claim, therefore, that a new north-south facility would minimize out-of-direction travel in a region generally aligned along east-west and southeast-northwest axis is unproven.

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<sup>7</sup> Employment in New York State. *Getting to Work in New York State*.  
<http://www.labor.state.ny.us/stats/PDFs/enys1106.pdf>. November 2006.

Certainly some degree of out-of-direction travel exists in every network as there are innumerable combinations of origins and destinations. Freeway facilities cannot address every possible link, but no evidence has been presented that the degree of out-of-direction travel in the San Gabriel Valley is disproportionate to that experienced in comparable urbanized regions.

There certainly are sub-regional trips between Alhambra, San Gabriel, South Pasadena, Arcadia and San Marino that may now be utilizing facilities that take them out of direct alignment with their destination; however the tunnel alternative would not address this need. These sub-regional trips would do in the future condition what they do in the existing condition, which is to utilize some portion of Valley Boulevard. While improvements to and alternatives for the sub-regional trips are most definitely a need, the limited access facility alternatives included do nothing to meet this stated purpose.

Figure 4, from the draft Purpose and Need, implies that certain linkages—like that from El Monte to downtown Pasadena—represent such a volume of demand as to warrant a direct regional facility. Setting aside that no evidence of this overwhelming demand has been demonstrated, even if a freeway were built connecting SR-710 to I-210, the travel distance on the freeway from El Monte to downtown Pasadena is nearly the same. Similarly, the trip from downtown Pasadena to City Terrace is a local trip, not a regional trip—the local arterial streets are appropriate to accommodate this trip. In fact, as noted above in “Need 1,” providing such a connection may, in fact, induce additional vehicular trips and more circuitous trips to take advantage of the new freeway facility. Mark Hansen of the University of California at Berkeley concluded that in California a 10 percent increase in highway capacity led to a 9 % increase in vehicle miles traveled.<sup>8</sup>

### **Need 5: Increasing periods of freeway congestion**

It is unprofessional to state with certainty that “total delay in Los Angeles County will increase significantly in the future” without stating the assumptions of the regional model. What does the model assume about gas prices in 2035? How does it take into account demographic trends that show a sharp decline in per capita Vehicle Miles Traveled (VMT) with the existing network? Why is Southern California Association of Governments (SCAG) assuming that 20<sup>th</sup> century predict-and-provide approaches to transportation are desirable, let alone financially viable, in the 21<sup>st</sup> century? If downtown Vancouver can achieve a 20% reduction in actual vehicle trips as it increases its population by 75% and increases jobs by 26%<sup>9</sup>, through comprehensive land use planning and increasing transportation options resulting in modal shifts to mass transit, bicycling and walking, why not Los Angeles?

Below is an excerpt from our comment letter on Regional Transportation Plan (RTP) that we believe should be incorporated into the final Need and Purpose as the air quality benefits of building a freeway may at the very best only provide short term air quality improvements but fail in any long term solution to improving the region’s air quality.

Conformity of the regional (metropolitan) transportation plan with the State Implementation Plan (SIP) is required by Clean Air Act (CAA) §176(c). In

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<sup>8</sup> Hansen, Mark, “Do New Highways Generate Traffic?” *Access*, No. 7, Fall 1995, pp. 16-22.

<sup>9</sup> Vancouver Transportation 2040, at [talkvancouver.com](http://talkvancouver.com)

addition, SB 375 requires SCAG to prepare a Sustainable Communities Strategy as part of the RTP. Under SB 375, the Plan must demonstrate that it achieves (and maintains) greenhouse gas emission reductions of 8% per capita by 2020 and 13% per capita by 2035. A primary goal of SB 375 is to significantly reduce Vehicle Miles Traveled (VMT) as a tool for greenhouse gas emission reductions.

There are substantial assumptions made in the RTP and associated PEIR regarding the air quality benefits and VMT reductions of a vehicular facility to close the perceived SR-710 Gap. It assumes that the project will provide congestion relief over the 20-year horizon of the RTP, reduce VMT by shortening trip distances, and allow the region to meet the GHG targets prescribed by SB 375. However national experience and recent literature<sup>10</sup> has raised substantial questions around the validity of these assumptions.

In the short-run, the Project may increase efficiency due to reduced congestion, yielding a decrease in emissions per mile of travel and a decrease in regional emissions. In the long-run, however, when additional capacity reduces congestion evidence in similar cases has illustrated some increase in the number of drivers beyond typically forecast growth without the facility expansion. In addition, adding new capacity to the region's freeway system will lower the cost of long commutes, increasing demand for housing in communities farther from the urban core. Newly available freeway capacity will indeed make possible more development on the periphery of the SCAG region, yielding longer trips. Therefore, the modeling methodology needs to take this into account as a networked system.

An illustrative case is the I-270 highway expansion project in the Metropolitan Washington Council of Governments (MWCOC) region. This project was included in the regional network as a necessary and valid congestion reduction measure, with associated air quality benefits. The project anticipated it would meet regional vehicular demands and provide free-flow traffic conditions over the bulk of the 20-year planning period. VMT growth was assumed steady despite the additional network capacity. However, within just 5 years of project

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<sup>10</sup> Relevant studies include:

Hansen, Mark, "Do New Highways Generate Traffic?" *Access*, No. 7, Fall 1995, pp. 16-22.

Fulton, Lewis et al. "A Statistical Analysis of Induced Travel Effects in the U.S. Mid-Atlantic Region", *Journal of Transportation Statistics*, April 2000.

Lee, Douglas B. et al "Induced Traffic and Induced Demand." *Transportation Research Record*, 1659.

Johnston, Robert et al. "Applying an Integrated Model to the Evaluation of Travel Demand Management Policies in the Sacramento Region." Mineta Transportation Institute, San Jose State University.

Cervero, Robert. "Road Expansion, Urban Growth, and Induced Travel: A Path Analysis." *Journal of the American Planning Association*, Volume 69, No. 2 June 2003, 145 - 163.

completion and opening the region found that congestion levels had returned to previous levels and air quality impacts were worse than before as more cars now occupied the facility at the same congested levels. In addition, dramatic residential development followed the corridor expansion, despite the presence of local land use plans, included in the regional modeling assumptions that anticipated the ability to control such growth.

### **Need 6: Unpredictable and increasingly variable travel times**

As cited in the report, PM peak hour speed is highly variable not only on I-5, but also on other freeways in the study area. No evidence is presented, however, that travel time variability can be reduced (and remain low) through capacity increase. Available research suggests that consistent reduction in travel time variability results from transportation management measures, not capacity increase, again indicating claim without demonstration of cause.

### **Need 7: Slow travel speeds**

The report repeatedly highlights that transit is stuck in the same congestion as all other traffic. This is, in reality, a policy decision and not a fixed condition. Regions across the U.S. are investing in exclusive or priority bus facilities to address this very issue. These regions recognize that mass transit, such as buses, is capable of carrying more people per unit of roadway than can be achieved with private automobiles. These regions are focusing on person throughput, rather than vehicle congestion. Please identify empirical data that shows that general purpose freeway expansion has resulted in improved transit travel times. We can identify no data to support. Why is the project not considering the systemic transit needs for the San Gabriel Valley, as is being done in the Westside Mobility Plan?

### **Unstated need – sub-regional mobility**

As stated in various locations above, a driving need in the study area is for better sub-regional mobility and connectivity. The purpose and needs statement itself clearly notes that as much as 75% of the trips made on the existing regional network are sub-regional.<sup>11</sup> Providing more and better ways to address these trips, through a multi-modal, multi-directional network of facilities and services, would do more to create lasting capacity and efficiency on the regional travel network. The mono-directional challenge isolated by this statement and the majority of alternatives developed to date does not address this sub-regional mobility need.

### **Lack of transparency regarding freight and goods movement**

Conspicuously absent from the purpose and needs statement is any discussion at all of the needs for goods and freight movement. The foundational purpose of the interstate system and a major driver of state roadway networks is to support the movement of goods (and originally for national defense). For a federal and state sponsored transportation project to make no mention at all of this element in the purpose and needs statement introduces substantial doubt as to the transparency and sincerity of the overall document.

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<sup>11</sup> "Analysis using the SCAG RTP travel demand model shows that over one-quarter of the traffic on I-5 between I-10 and SR 110 does not have an origin or destination between SR 710 and SR 134." SR 710 Study Draft Purpose and Need, November 8, 2012. Pg. 6

It is appreciated that this element was discussed in detail at the November 15, 2012 Stakeholder Outreach Advisory Committee meeting. This makes it all the more curious, that goods movement is not addressed as an underlying need for the project. We have strong doubts about some claims made in the November 15 presentation—principally the position that the construction of a limited access tunnel facility on the 710 alignment would not alter regional truck patterns. Goods movement and delivery is more constrained by time than distance—meaning that while the pattern of distribution centers may very well be fixed, trucks will most definitely alter trip routes—even opting for more out of directional travel—if the trip will be less congested, more predictable, and ultimately faster than current routes. The proposed tunnel would create a parallel corridor to the highly congested, and reliably unpredictable I-5 corridor. The claim that trucks would not alter from their current patterns is unfounded and dangerously speculative.

### **Breadth of Alternatives**

Given the narrowness of the defined Purpose and Need to an exclusively north-south travel demand pattern and focus on the regional freeway system in near isolation, the current SR-710 study alternatives are fundamentally flawed. The need, and the associated evaluation of alternatives, must begin first with an assessment of sub-regional trips presently utilizing, and congesting, the regional travel networks and multi-modal, multi-corridor options to satisfy these trips to relieve pressure on the limited access system. Any good and valid alternative to address freeway congestion, travel time unreliability, and out of direction travel will require improvements that address the multi-directional mobility demands of the larger San Gabriel Valley.

Further, evaluation of the alternatives presented must strongly weigh the long term effectiveness of the proposed action in sustainably addressing the mobility needs expressed in this Purpose and Need statement. Given the well-documented effects of expanding highway capacity, none of the alternatives advanced save for the Transportation System Management/Demand Management option, addresses sustainable effects.

The low-build, multi-modal option is not expressly reflected in the five alternatives advanced for further environmental assessment. Instead, the three non-management solutions are mono-modal in their approach and divorced from their relationship with the local street network. We recommend the inclusion of an integrated multi-modal, network based alternative.

### **Conclusion**

Nowhere has Los Angeles Metropolitan Transportation Authority (Metro) or Caltrans established a case that there is a significant need for additional north-south regional traffic capacity in the study area, nor that the need for additional north-south capacity outweighs the need for more east-west capacity, nor that a north-south project in this study area outweighs other regional priorities.

The needs articulated in the provided statement are narrow and incomplete, but beyond that, the evidence provided as the foundation for addressing these needs through various alternatives is suspect at best and outright false in some instances.

Even more troubling is the apparent disregard for seeking long-term solutions to the needs articulated. Any solution will require a substantial investment of public funds. It is absolutely critical then that the alternatives explored unequivocally demonstrate the ability to improve the needs expressed not just for the next 10 or 20 years, but for the next 50 to 100 years of the

region's growth. The attention to this fiscal stewardship and sustainability of any solution proposed is fully absent from this purpose and needs statement.

The final purposes articulated to "effectively and efficiently" improve freeway and transit networks, reduce congestion on local arterials, and minimize environmental impacts related to mobile sources cannot be met by the narrowly defined alternatives advanced. The needs defined here, and the shallow evidence defending them, raise significant questions about the ability of this process to proceed objectively to address the real purpose of improving travel in the San Gabriel Valley.

Sincerely,



Richard D. Schneider, M.D.  
Mayor



Marina Khubesian, M.D.  
Mayor Pro Tem



Michael A. Cacciotti  
Councilmember



Philip C. Putnam  
Councilmember



Robert S. Joe  
Councilmember

CC: Senator Carol Liu  
Senator Ed Hernandez  
Assemblymember Chris Holden  
Burbank City Council  
Glendale City Council  
La Cañada Flintridge City Council  
Los Angeles City Council  
Pasadena City Council  
Sierra Madre City Council  
Brian Kelly, Undersecretary at the Business Transportation and Housing Agency  
Malcolm Dougherty, Director of the California Department of Transportation  
Art Leahy, Metro CEO