



CITY COUNCIL

Laura Olhasso, Mayor
Donald R. Voss, Mayor Pro Tem
Gregory C. Brown
Stephen A. Del Guercio
David A. Spence

Mr. Mike Jones
Regional Planner
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017-3435

SUBJECT: "I-710 Missing Link Truck Study" Comments

Dear Mr. Jones:

Background:

The City of La Cañada Flintridge has reviewed the Draft Final Report for the I-710 Missing Link Truck Study prepared by Iteris dated May 2009. In addition, City staff has participated in several meetings hosted by the Arroyo-Verdugo Subregion regarding this Study. This Study was commissioned by the Southern California Association of Governments (SCAG) to further examine the potential vehicle and truck impacts on the surrounding freeway and roadway network if a tunnel was constructed between the existing northerly terminus of the SR-710 Freeway in Alhambra and the I-210/SR-134 freeway interchange in Pasadena. SCAG has emphasized that this study is technical and comparative in nature and is not meant as a recommendation either for or against a freeway tunnel.

City Comments:

The City's primary objections are the assumptions made in the preparation of the Study and unilateral recommendations of its conclusion. We question the usefulness and intent of the Study's findings, and are concerned about the myopic analysis made without consideration of the larger context of the alternatives and effects on regional traffic. **But, most importantly, the City also questions the usefulness of constructing the tunnel, since, based on the study's findings, if the tunnel is built, motorists would be driving farther and spending more time on the road.**

In response to SCAG's request for comments on the draft Final Report, the following detailed comments have been prepared after a review of the Study and listening to the technical consultant presentations.

1. The Study should explain its origin in more detail, and the reason why it was commissioned. The Study should clarify the purpose for this Study and under what guidelines it should or should not be used. The explanation should identify:
 - a. the responsible agencies involved in the prior studies;
 - b. the process used to define the scope of work;
 - c. why this Study was deemed necessary;
 - d. the exact scope as approved by SCAG; and

- e. what the anticipated uses are for this document.
2. The Study should clarify that the Study was not prepared for the Arroyo Verdugo Subregion as stated in the title.
3. The Study should NOT assume that the “Route 710 Tunnel Technical Feasibility Assessment Report,” conducted by Metro, conclusively demonstrated the environmental feasibility of the project, including the potential traffic impacts (Page 1). The Study even admits that the feasibility study did not extensively review the traffic effects on the roadway system.
4. The Study scope is very limited and uses outdated information and assumptions. Without updated and expanded analysis, this Study has NO validity. As such, it should not and can not form the basis for informed public participation and informed decision making. In Berkeley Keep Jets Over the Bay Committee v. Board of Port Com’rs (2001) 91 Cal.App.4th 1344, the Court concluded that an EIR that used “outdated information . . . was not a reasoned and good faith effort to inform decision makers and the public.” Id. at 1367. At a minimum, the Study should be updated with SCAG 2009 Regional Transportation Plan (RTP) assumptions and modeling, and its scope should be expanded to answer the comments raised by the Arroyo-Verdugo participating cities and detailed below.
5. The Study confirms that in every comparison, the tunnel project would cause SIGNIFICANT detrimental traffic and truck impacts on the segment of the I-210 Freeway through the cities of La Cañada Flintridge, Glendale, Pasadena, and the community of La Crescenta.
6. A comparison of 2030 values with and without the tunnel project concludes:
 - a. More than 25% increase in daily volume on I-210
 - b. Additional 30,000 vehicles per day on I-210
 - c. Additional 2,500 trucks per day on I-210
 - d. 850 additional trucks per PM PEAK HOUR on I-210
 - e. Truck percentages on I-210 increase from 11% to over 20%
 - f. Higher truck volumes on Foothill Boulevard (almost no current truck volumes)
 - g. Before-no freeway segments through City over capacity, after-most northbound segments over capacity
 - h. I-210 freeway segments through city will operate over capacity (Level-of-Service F) and consequently force traffic onto local streets
 - i. Foothill Boulevard will operate over capacity near Angeles Crest Highway
7. The Study repeatedly incorrectly identifies the tunnel segment as the “missing link” or “gap closure” when there is no mandate that it must be connected. The Study should explain the background and history of the 710 freeway connection, and that it is not universally assumed to be a “link” or “gap closure”, as well as more detail on the origins of the tunnel alternative.
8. The Study should have given the results of the AM peak hour analysis in addition to the PM peak hour. Different traffic patterns are prevalent in the AM commuting hours and the associated potential AM impacts should have been identified and examined for the decision makers’ review.

9. The Study should analyze the freeway interchange connections, transition lane capacities and arterial street intersections in determining Levels-of-Service and potential adverse impacts. It is universally recognized (see Highway Capacity Manual) that the “nodes” or intersections of roadways are the constraining features of a road network, not the segments in between.
10. The Study was made using outdated SCAG 2004 Regional Transportation Plan (RTP) regional traffic modeling for 2030 future traffic conditions with and without the freeway extension. After this study was initiated, the 2009 RTP with 2035 future traffic volumes and regional modeling was completed which included numerous updates to the RTP list of programmed projects. This Study should be expanded to compare traffic volumes on the roadway system using the updated 2035 forecasting.
11. If the Study does not use updated 2009 RTP forecasting model, then it is based on old, invalid data and must not be used in any subsequent study or analysis, particularly related to an EIR. At the very least, the Study shall include a disclaimer that it is based on outdated information and an updated analysis would be necessary for any future comparisons referencing this Study.
12. The Study should describe the assumptions made on the physical and operational characteristics of the tunnel, such as alignment, number of lanes, Level-of-Service, vertical grade, toll booths, access control, etc.
13. The Study only considered a connection between the SR-710 terminus and the I-210 Freeway. The Study should compare traffic and truck conditions for the different tunnel alignments as a way to determine if fewer adverse traffic impacts could be expected with a different scenario. This comparison would be consistent with the geological studies currently being conducted on a route-neutral basis with five possible alignments. For example, a tunnel alignment option that connects to the SR-2 freeway would mitigate the expected capacity deficiencies (and significant adverse impacts) along the I-210 freeway.
14. The Study was constrained to making findings about how truck and vehicle traffic would be redistributed with and without the tunnel. It should have compared alternate system-wide solutions to a tunnel scenario to help determine if there would be greater benefit or the cost would be better spent by making improvements to the existing roadway system with fewer environmental impacts than a tunnel.
15. The Study only analyzes a 4-lane tunnel scenario. The Study should compare the traffic conditions for a 3-lane tunnel as well, which was contemplated in the initial feasibility study.
16. The Study should also compare the future traffic conditions for a tunnel with NO trucks allowed, as discussed in the initial tunnel feasibility study.
17. The toll issue was not considered: full-access, free-flowing conditions were assumed. Any congestion from a toll booth would be handled by adding more toll booths and/or fastrak services. Toll booth congestion was not factored into drive time analyses. In addition, the

question of whether existing surface street congestion would be mitigated to any large extent because of traffic not using a tolled tunnel is not studied.

18. The study does not consider the vertical grade and its impacts on truck routing through or around the tunnel.
19. The Study identifies several freeway and arterial road segment impacts with expected adverse impacts and makes certain recommendations, but does not determine if these capacity enhancements would actually work or even mitigate the impact. The Study should be expanded to include a comparative analysis of the future roadway conditions if the recommendations/strategies were implemented.
20. The Study recommends adding a 5th travel lane to the segment of I-210 through the City (Section 5.1) as a way to address expected capacity deficiencies and increase in truck traffic. However, the Study does not identify the other related adverse impacts related to widening the freeway, nor does it consider other alternatives to widening. Therefore, the recommendations are premature and not thought out. The recommendations should be removed completely and replaced with a statement that these key issues would need to be addressed and/or mitigated.
21. If recommendations are to be included in the study, other capacity enhancing alternatives need to be considered, such as Demand Management, ITS, expanded rail freight transportation and exclusive truck corridors. If only freeway capacity enhancements are being considered, it should be clearly stated that there are numerous possible mitigation alternatives that have not been presented or analyzed, and the feasibility of any capacity enhancement has not been determined.
22. The recommendation to address expected impacts to Foothill Boulevard (Section 5.2) is incoherent and not understood. This recommendation needs to be clarified, and address all traffic, not just truck connections. It should be understood that SR-2 north of the I-210 Freeway is NOT a truck route and has truck restrictions. In addition, Foothill Boulevard is NOT a truck route, so non-local trucks are not allowed. Any reference to a truck route on Foothill Boulevard within the City should be removed.
23. While the Study graphically compares conditions with and without the tunnel, it is important that it quantify the magnitude of the operational improvement to the roadway system (or users) versus capacity degradations and overall delays to determine if the existing condition would be better to the road users than the proposed tunnel connection. A comparison parameter could be the miles of roadway that would decrease to LOS-F vs. the miles that would improve to LOS-E or better. Another comparison parameter would be vehicle hours of delay. This type of analysis would be limited to traffic benefits at this time, but should ultimately be evaluated on other environmental conditions as well.

It should be noted in the Study that a formal traffic impact study that is part of an EIR would have to address the same and more extensive traffic issues independently of this study and evaluate a full range of potential alternatives and mitigation measures.

The tunnel connection creates some new LOS-F conditions, particularly at the gap-closure connection points and along the I-210 freeway north of SR-134. The project should not create new problems where there were none before.

The Study does not identify the magnitude of impacts on roadways adjacent to sensitive land uses i.e. residences, schools, etc. as opposed to those roadways adjacent to sensitive uses that would experience improvements. Any further study of the I-710 freeway connection should evaluate the overall benefit versus the adverse environmental impacts on the roadway network. This includes the impacts on multiple schools and thousands of school children within 1,000 feet of the 210 Freeway through the City.

Amazingly, the Study's summary findings conclude that the tunnel connection would make overall driving conditions worse. The number of vehicle miles traveled would INCREASE in the peak hour with an I-710 connection, which would bring a host of unintended environmental impacts. Even more astounding is that the number of vehicle hours would INCREASE as well, which translates to more hours of delay, gas consumption and air pollution. The system-wide benefit would be a small increase in overall average speed of 0.6 miles per hour. Regionally, the substandard traffic conditions that exist would not be improved if the tunnel was built and additionally, those substandard conditions would be introduced into areas that would otherwise, without the tunnel, have standard or better conditions. So, simply stated, if the tunnel is built, motorists would be driving farther and spending more time on the road. This is exactly the OPPOSITE of the intended regional objective of the tunnel connection. Isn't this enough reason to stop pursuing this project?

In conclusion, the City of La Cañada Flintridge urges that SCAG deem this study incomplete, and table any further discussion on this Study until: (1) an updated Study is prepared where current data, information and assumptions are presented; and/or (2) the CEQA challenges of the I-710 Tunnel to Measure R have been fully and finally adjudicated.

Sincerely,



Laura Olhasso
Mayor

c: City Council
Mark R. Alexander, City Manager
Honorable Assembly Member Anthony Portantino
Honorable Senator Carol Liu
Honorable Supervisor Michael Antonovich
Hasan Ikhata, Executive Director, SCAG
Douglas Failing, Director, Caltrans District 7
Arthur Leahy, Chief Executive Officer, Metro
Honorable City Council Members and City Manager, City of Glendale
Honorable City Council Members and City Manager, City of Pasadena
Honorable City Council and City Manager, City of South Pasadena
Erik Zandvliet, City Traffic Engineer
Ann Wilson, Senior Management Analyst

Appendix A

City of La Cañada Flintridge I-710 Missing Link Truck Study Review

TECHNICAL CORRECTIONS

1. Section 1 – The I-210 Freeway description is inaccurate and should be modified to include the connection east of the SR-57 freeway.
2. Section 2.3 – Please describe that no collision data was collected from certain cities, including the City of La Canada Flintridge
3. Section 2.5 and Figure 11 – Remove truck route from Foothill Boulevard in the City of La Canada Flintridge. Explain there are no truck routes in the City.
4. Change references to Gap Closure to “Tunnel” or “Connection”.
5. Table 11- Provide legend for color-coding of issues and color code all Plan + Gap Closure scenarios stating “Same as Baseline Conditions).