



CITY COUNCIL

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March 7, 2013

Ms. Mary Nichols, Chair
& Members of the California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Investment plan for cap-and-trade auction proceeds – Support for investment in light rail, bus rapid transit, active transportation and other non-highway projects

Dear Honorable Chair and Members:

This letter is submitted in response to your request for public comment regarding the development of investment plans and other materials that support California's use of auction proceeds under the Air Resources Board's (ARB or Board) Cap-and-Trade Regulation. This is to support Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. We are aware that AB 1532 (Pérez), SB 535 (De Leon) and SB 1018 (Budget and Fiscal Review Committee, Chapter 39) together establish a framework for developing this investment plan. We further understand that the Department of Finance, in consultation with the ARB, will be developing and submitting a three-year plan for the auction proceeds.

These statutes enable the creation of the Greenhouse Gas Reduction Fund (Fund) to receive auction proceeds. They also provide the framework for how the auction proceeds will be administered. In particular, AB 1532 (Pérez), in creating the Greenhouse Reduction Account, used the following criteria:

"The state board shall award the moneys in the Greenhouse Gas Reduction Account appropriated pursuant to subdivision (b) only for measures and programs that reduce greenhouse gas emissions consistent with this division to achieve any of the following:

*(1) Clean and efficient energy, through energy efficiency, clean and renewable distributed energy generation, and related activities. (2) Low-carbon transportation, through the development of state-of-the-art systems to move goods and freight, deploy advanced technology vehicles and vehicle infrastructure, produce and use advanced biofuels, and increase the availability of low-carbon and public transportation. (3) Natural resource protection, through measures associated with water use and supply, land and natural resource conservation and management, and sustainable agriculture. (4) **Sustainable infrastructure development, through strategic planning and development of major infrastructure, including transportation and housing.**" (emphasis added.)*

The City wholeheartedly supports the reduction of greenhouse gases and the implementation of truly "sustainable" transportation projects that definitively prove to be sustainable after careful independent analysis. The issue of which projects may be included under this category is of great concern to the City.

The City of La Cañada Flintridge is located in the project area of the proposed “SR-710 North” project. This project, as you know, is in the environmental review stage and currently, five alternatives are under consideration. They are:

- Transportation System Management/Transportation Demand Management (TSM/TDM)
- Bus Rapid Transit (BRT)
- Light Rail Transit (LRT)
- Freeway Tunnel (F-7X)
- No Build (required by law to be studied)

The City Council has formally taken a position against the SR-710 “Freeway Tunnel” in large measure because of the increased numbers of vehicles that it will bring through the City. The City has many schools and homes near the freeway (school/freeway proximity map attached). You, as Members of the Air Resources Board, are well aware of the dangers of increased smog exposure to children. Dr. Rob McConnell, USC Keck School of Medicine, Division of Environmental Health, one of the contributors to the “Children’s Health Study”, has indicated in presentations before the City Council that, “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 disease.” Additionally, the “Children’s Health Study” has indicated that, “There is “emerging scientific consensus that residential or school proximity to major traffic corridors is associated with respiratory impairment in children and in adults,” and that “Residential proximity to freeways is associated with increased rates of asthma. A group of pollutants is associated with slower growth in lung function, which is a strong predictor of “debilitating lung disease and mortality in later life.” These facts have been the primary driver, along with the huge project expense without a clear showing of public benefit, that the City Council opposes the “Freeway Tunnel” project and opposes investment in that project. Dr. McConnell has also recently stated that the current laws regulating air quality have not kept up with the air quality regulations and that dangerous particles exist that are not currently regulated.

Additionally, the investment in additional highway projects in areas already congested has been shown, in many studies, to fail. In fact, often traffic is “induced” or attracted from other areas, and then the new highway facility quickly reaches gridlock. Although the Southern California Association of Governments (SCAG), in its Regional Transportation Plan (RTP), made assumptions regarding improvement in Vehicle Miles Traveled (VMT) reductions that may be achieved by a network which includes the SR-710 highway expansion, these assumptions are questionable. SCAG’s assumed results included congestion relief, reduced VMT, and lower greenhouse gas emissions. These assumptions are not borne out by recent research¹ and

1 Relevant studies include:

- 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.

comparable peer regions. Research in California has concluded that a 10 percent increase in highway capacity leads to a nine percent increase in VMT.² A recent and extensive study utilizing FHWA data also concluded that new or expanded interstate facilities correlate with VMT increases on a nearly one-for-one percentage basis and that the increase is above and beyond VMT that shifts from alternative routes or other modes.³ The new facility will attract additional drivers, additional trips, and convert some transit trips to vehicle trips eliminating most assumed air quality benefits.

A comparable case in the Metropolitan Washington Council of Governments (MWCOC) region had just such a result with the 1991 widening of I-270. This project was included in the regional network and analyzed in the regional air quality model, which assumed that the added capacity would reduce congestion, improve mobility and provide air quality benefits. It further assumed that the majority of trips on the new facility would be diverted from the smaller streets on the network and therefore assumed no change in VMT projections and no reduction in transit mode share. Within just 8 years of project completion, however, congestion levels had returned to previous levels – in some segments, 10 years earlier than the model predicted. Dramatic residential development followed the facility expansion, despite regional modeling assumptions that local land use plans could control such growth. The corridor paralleled the heavy rail transit “red line” and despite increases in population along the transit corridor, transit ridership dropped by over 6 percent during the first three years after the additional lanes opened. The added cars and early congestion meant air quality impacts were worse than the model had predicted. In 2001, 10 years after the widening opened, for the first time ever, the regional transportation plan for the Washington Region failed to meet federal Clean Air requirements and all planning had to be put on hold.⁴

Therefore, not only is the SR-710 “Freeway Tunnel” unworkable, but investment in additional highway projects run the risk of failing entirely to achieve any expected air quality gains.

The City Council fully recognizes that there is a regional issue that needs to be resolved and certainly wants to find a solution that works for the entire region. We support investment in Bus Rapid Transit, Light Rail Transit (whether north-south or the Gold Line extension), TSM/TDM improvements, and Active Transportation solutions.

The City has a network of over 25 miles of multi-modal trails in which the City has heavily invested and which are widely used by its residents for active transportation purposes. We have completed, within the past few years, an east-west bicycle facility. We are adding to that by a current bikeway that is under construction. Additionally, the City applied for and has been funded for a new bikeway and new greenbelt and pedestrian walkway with many trees. We have just recently applied for a grant for a major project (a “Complete Street” project) which would make our downtown more pedestrian-friendly. Our City Council firmly believes in Active Transportation solutions and has invested heavily in it. Additionally, the City has received

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

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

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

grants for Safe Routes to School and has built those safe routes. Further investment in these areas would be welcome.

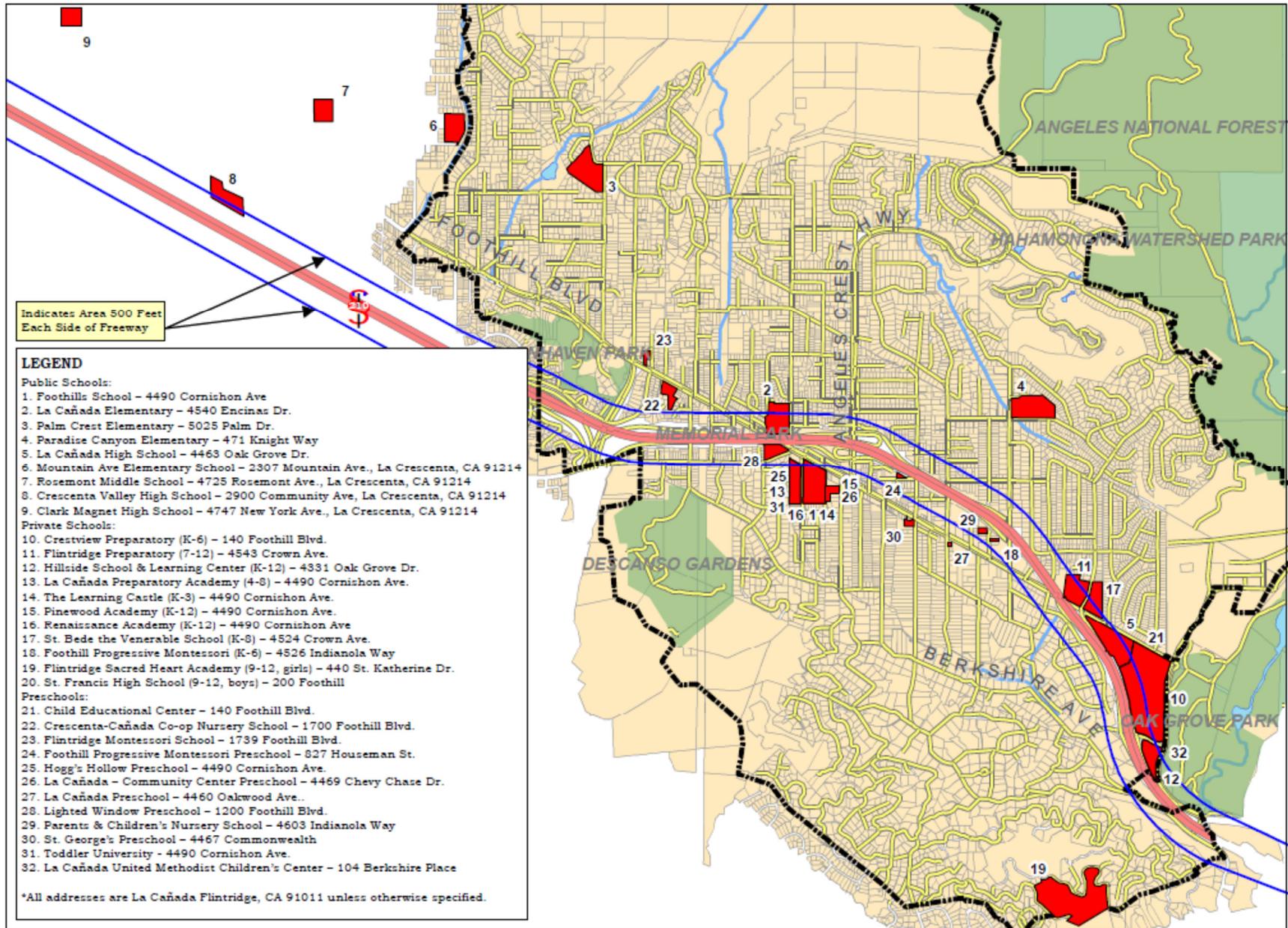
We must, as responsible public officials, protect the health of everyone, especially our children. We are endeavoring, at every opportunity, including this one, to state publicly that our investigation of the facts of the SR-710 "Freeway Tunnel" project indicates an alarming amount of air pollution and congestion that will come into our community and the surrounding communities. In fact, independent studies have shown that the congestion that now exists outside our City and on the south of the project area, would only be slightly improved and the surface street congestion only improved by approximately 25%. For these improvements, it is too high a price to pay. We ask that you prohibit investment in this harmful project. We also ask that you invest in improving congestion within our region through light rail, freight-to-rail, bus rapid transit, TSM/TDM and Active Transportation for the benefit of everyone in our region.

Thank you very much for the opportunity to comment on this important investment.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Del Guercio". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Stephen A. Del Guercio
Mayor



**City of La Cañada Flintridge
Schools in Close Proximity to the I-210 Freeway**