September 25, 2019

Metro Board of Directors
One Gateway Plaza
Los Angeles, CA 90013
Dear Metro Board Members and Staff,

As community-based organizations, neighborhood groups, local stakeholders, and project area residents committed to improving the health and well-being of residents of Los Angeles County, regional air quality and climate goals, and the safety of local streets, the undersigned urge the Metro Board to:

1. Approve LA County/City project lists, which are largely focused on multi-modal, climate-friendly improvements vetted and supported by local stakeholders, neighborhood groups, and residents;
2. Provide San Gabriel Valley cities an additional 30 days to refine and/or submit additional projects, per Board and staff input at the 9/18/2019 Policy and Programming Meeting regarding Metro’s openness to project types in all categories (e.g., ITS; Local Intersection Improvements; Transit; Active Transit; Maintenance/Rehab/Safety);
3. Score all projects using the Metro-Board-adopted Performance Metrics for Major Projects (Mobility, Economy, Accessibility, Safety, Sustainability & Quality of Life) to determine consistency with Metro Strategic Plan goals; share scoring with cities a minimum of 14 days prior to Board review; and
4. Direct staff to ensure fidelity of approved projects to Metro’s 2014 Complete Streets Policy before transferring funding.

Project Background

2017 Board Motion
After decades of study, discussion, and legal action, in 2017 the Metro Board adopted a motion by Directors Fasana, Barger, Solis, Garcetti, and Najaria to shelve plans for a highway expansion and invest in Transportation Demand Management and Transportation Systems Management (TDM/TSM) alternatives. The motion directed staff to reallocate Measure R and other funds dedicated to the construction of a highway to local mobility improvements. It specifically encouraged Metro, Caltrans, and the corridor cities to:

“pursue policies and actions that would promote smart and functional land use, reduce automobile dependency, encourage multi-modal trips, improve traffic operations, and maximize the use of the latest available technologies to enhance performance of the existing transportation system to minimize impacts of the regional traffic on the communities along the SR-710 corridor.”
Project Area Vehicle Traffic

According to the SR 710-N North Environmental Impact Report, only 13.7% of peak PM traffic in the project area is regional (i.e. moves between the I-10 and I-210/I-134 freeways). In other words, 86.3% of vehicle trips along the corridor are local in nature (Source: DEIR Transportation Technical Report, Table 4-9, page 4-18). Local corridor traffic in Pasadena, South Pasadena, and Alhambra is not being addressed with the projects recommended for funding by Metro staff. With these projects funded by a one-time grant, if the decades long traffic congestion is not tackled now, the neighborhoods in the SR-710 corridor may never be relieved of this traffic.

Round 1 Funding (December 2018)

At its December 6, 2018 meeting, the Metro Board approved over $500 million in funding for projects that will increase automobile dependency, discourage multi-modal trips, and further entrench auto-centric land-use. With the exception of the $100 million allocated for stub redesign in the City of Alhambra, the selected projects focused on moving vehicles faster, an approach that will result in more vehicle miles traveled (VMT), more localized air pollution, more greenhouse gas emissions, and more preventable traffic collisions and deaths. At the time, Metro staff and board members stated Round 2 funds would be focused on multi-modal projects.

Round 2 Funding Recommendations (September 2019)

In mid-September, Metro staff made public Round 2 project recommendations. For LA City and County project area residents, the project list includes a variety of transit, active transit, and multi-modal projects designed to reduce vehicle trips. This is laudable and the direction Los Angeles County needs to move in to successfully address existing health, environmental, and equity issues. These projects are also largely consistent with board adopted Complete Streets, Equity, and Sustainability policies.

Yet for San Gabriel Valley residents, staff recommendations do not include a single transit, active transportation, or other demand management project to support reducing vehicle trips. Recommended projects for the San Gabriel Valley are singularly focused on enhancing vehicle capacity, to the detriment of public health, public safety, greenhouse gas emissions, and the region’s worst-in-nation air quality.

Project selection is justified on an outdated metric -- “Level of Service (LOS)” -- rather than the new statewide standard for planning - “Vehicle Miles Traveled (VMT)”; the former focuses solely on moving vehicles through intersections, the latter moving people and reducing vehicle trips. Investing hundreds of millions of dollars in projects focused on moving vehicles through intersections faster will only induce additional car trips, resulting in no net benefit to travel times and automobile congestion, the purported justification for these projects. This outcome of roadway widening and expansion is well-documented and acknowledged in the academic world. In 2017 the Governor’s Office of Planning and Research advised agencies that “each percent increase in lane miles results in a 1.03 percent increase in vehicle travel” (Source: pg. 29 - http://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf).

Comment Letter 9/25/2019 SR-710-N Funding Round 2
Recommended projects for the San Gabriel Valley are not consistent with Metro’s Complete Streets Policy. In October 2014 the Metro Board of Directors adopted a Complete Streets Policy to “establish a standard of excellence for multimodal design,” recognizing Metro’s unique position to “help advance state, regional and local efforts to create a more ‘complete’ and integrated transportation network that serves all users (including pedestrians, users and operators of public transit, bicyclists, persons with disabilities, seniors, children, motorists, users of green modes, and movers of commercial goods) and supports environmental sustainability” (page 3). Metro’s Complete Streets policy further underlines that all relevant departments at Metro, partner agencies, and funding recipients shall approach every relevant project, program, and practice as an opportunity to improve streets and the transportation network for all categories of users” (Page 4). Metro Highway staff has not met this standard in selecting projects.

No longer a highway project, the SR 710-N reallocation must consider the needs and safety of all roadway users, including older adults, children, and mobility-impaired residents who walk along and walk across streets selected for auto improvements -- not for recreation, but transportation -- to access local schools, community sites, and businesses. The vast majority of Round 1 and 2 San Gabriel Valley projects are designed to move cars versus people via “improvements” that will make streets more difficult to cross by foot. Unless mitigated with best practices in safe design, this will result in more serious injuries and deaths at a time when such preventable collisions are on the rise across Los Angeles County; traffic crashes are the number one cause of premature death in Los Angeles County for children aged 5-14, and number two cause for children 1-4, young adults 15-24, and adults 25-44 (Source: Los Angeles County Department of Public Health, Mortality in Los Angeles County, http://publichealth.lacounty.gov/dca/data/documents/mortalityrpt12.pdf).

Project selection is also not consistent with the 2018 adopted Metro Equity Platform Framework. Metro staff failed to incorporate equity-based performance metrics in investment decisions for the corridor. Staff did not ensure that project area communities hosted forums to engage the community meaningfully and actively, resulting in a piecemeal community engagement and outreach process for a reallocation of over $1 billion in corridor funding.

Project Eligibility
At the Metro Planning and Programming Committee meeting on September 18th, 2019, Metro staff stated that eligible cities were invited to submit a wide range of project types, including transit, active transportation, and rehab/safety projects. Yet over the past nine months city staff from multiple San Gabriel Valley communities have shared that Metro staff members declined requests to integrate safety measures and pedestrian, bicycle, and transit improvements to corridor projects, even in cases when the latter would have no impact on vehicle throughput. Due to the inconsistency between the original board motion, project submission directions, and project selection process, the Cities of Alhambra, Pasadena, and South Pasadena submitted a joint letter to Metro on March 26, 2019 requesting clarification.
on this matter (included below for your reference). Six months later every San Gabriel Valley request for multi-modal project funding -- including but not limited to Bus Rapid Transit, first/last mile improvements, and Gold Line shuttle service -- was unjustifiably rejected by Metro staff.

We call on you to intervene and make this right. San Gabriel Valley cities deserve a chance to submit multi-modal mobility projects, and receive funding for those projects as staff has recommended for LA City and LA County.

Carter Rubin  
Mobility and Climate Advocate  
Natural Resources Defense Council

David Diaz  
Executive Director  
Active San Gabriel Valley

Bryn Lindblad  
Deputy Director  
Climate Resolve

Kyle Tsukahira  
Interim Director  
Asian Pacific Islander Forward Movement

Jessica Meaney  
Executive Director  
Investing in Place

Robin Mark  
Program Manager  
The Trust for Public Land

Paul Arney  
Organizer  
Concerned Southwest Residents of Pasadena 2.0

Lynn Bryan  
Organizer  
Caltrans Tenants of the 710 Corridor

Dr. Gene Wester  
Steering Committee Member  
Pasadena Complete Streets Coalition

Jared Sanchez  
Senior Policy Advocate  
California Bicycle Coalition

Jazmine De La Torre  
Program Coordinator  
Healthy Communities Initiative  
Day One

Ryan P. McDaniel  
Director of Advancement  
Sequoyah School

Claire Bogaard  
No 710 Action Committee

Eli Lipmen  
Director of Programming and Development  
Move LA

Jan SooHoo  
No 710 Action Committee

Eli Kaufman  
Executive Director  
Los Angeles County Bike Coalition

Andrea Fox  
Organizer

Río Oxas  
Building Power Director  
People for Mobility Justice

Comment Letter  9/25/2019  SR-710-N Funding Round 2
City-Submitted Projects with Multi-Modal Benefit NOT Recommended for Funding

- **Alhambra**
  - Metro Gold Line Shuttle - $750,000
  - Bike Plan Implementation Project [Citywide] - $650,000

- **San Gabriel**
  - Transit Service to Light Rail - $500,000
  - Local Circulator Bus Service - $1,000,000
  - First-mile/last mile improvements - $2,000,000
  - Valley Boulevard Corridor Bus Rapid Transit [BRT] - $59,100,000
  - Multimodal Transit Center and Parking Structure - $24,000,000
  - Citywide Bicycle Facilities - $35,000,000

- **South Pasadena**
  - Regional Traffic Corridor Improvements (supporting bicycle and pedestrian safety components) - $10,000,000
  - Neighborhood Traffic Safety Program - $5,000,000

- **Pasadena**
  - Pasadena Avenue/St. Johns Avenue Complete Streets - $15,000,000
  - Allen Avenue Complete Streets - $1,500,000
  - Hill Avenue Complete Streets - $1,500,000
  - Avenue 64 Complete Streets - $2,000,000
  - Rapid Bus Improvements - $10,000,000
  - Student Transit Passes - $200,000
  - Electric Transit Vehicles - $28,000,000
- Bicycle Transportation Action Plan Projects - $5,000,000
- The Arroyo Link - Multi-Use Path - $2,000,000
- Mobility Hubs - $10,000,000

Sample of Project Scoring Utilizing Metro Adopted Performance Metrics (source)

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<th>Project Name</th>
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<th>Safety</th>
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<td>Westside Purple Line Extension - Section 4 to Bundy</td>
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<td>SGV</td>
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1. Total Scores may not add up due to rounding.
2. Project name describes the project scope that was funded. Modeled scope may vary.
March 26, 2019

Metro Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Re: State Route 710 Corridor Mobility Improvements Investments

Dear Metro Board of Directors,

The cities of Alhambra, Pasadena, and South Pasadena (Cities) greatly appreciate the leadership provided by the Metro Board of Directors to help the corridor cities implement the State Route 710 (SR-710) Corridor Mobility Improvements Investment projects (also known as the Early Action Projects). We have focused our collective actions on implementing the spirit and intent of the May 2017 Metro Board Motion (item 29; File ID 2017-0097: SR-710 North). The Cities are excited to move forward with the projects that have been awarded under Phase I and to submit additional projects to be awarded in June 2019 for Phase II.

In preparation for the Phase II submittals and subsequent funding agreements, the Cities would like to request the following information to ensure regional coordination and the implementation of appropriate mobility improvements:

1. Clarification regarding project eligibility for non-capacity enhancing projects;
2. Explanation of the project evaluation process;
3. Opportunities for additional technical support and cross-jurisdictional collaboration; and
4. Creation of a Project Funding Process that outlines the next steps to implement the projects in a timely fashion.

For more information regarding the requested information, please see the attached SR-710 Corridor Mobility Improvement Investments Suggestions.

The Cities appreciate your consideration of these requests and looks forward to working collaboratively with Metro to alleviate local traffic and improving mobility in the corridor. If you have any questions or comments please feel free to contact Margaret Lin, Principal Management Analyst, at MLin@southpasadenac.gov or (626) 403-7236.

Sincerely,

Jefissa Binquet
Alhambra City Manager

Steve Mermell
Pasadena City Manager

Stephanie DeWolfe
South Pasadena City Manager

Attachment: SR-710 Corridor Mobility Improvement Investments Suggestions

cc: The Honorable Anthony Portantino, Senator, 25th District
The Honorable Chris Holden, Assembly Member, 41st District
Alhambra City Council
Los Angeles City Council
Pasadena City Council
South Pasadena City Council
Phil Washington, Metro CIBO
SR-710 Corridor Mobility Improvement Investments Suggestions

Project Eligibility
On February 15, 2019, a fact sheet was distributed to the Cities regarding the SR-710 Corridor Mobility Improvements Investment. However, there is still some confusion regarding project eligibility for Phase II. The historic May 2017, Metro Board Motion to reallocate the remaining Measure R funds to the Transportation System Management/Transportation Demand Management (TSM/TDM) Alternative and new mobility improvement projects specified “Funds shall be prioritized for multi-modal and safety enhancement projects within the SR-710 North Study Area.” The Board Motion further “Encourages the corridor cities, Caltrans, and Metro to collectively pursue policies and actions that would promote smart and functional land use, reduce automobile dependency, encourage multi-modal trips, improve traffic operations, and maximize the use of the latest available technologies to enhance the performance of the existing transportation system to minimize impacts of the regional traffic on the communities along the SR-710 corridor.” However, the fact sheet indicates that projects will only be deemed eligible if they enhance vehicular capacity. There is no consideration for active transportation or safety components, which seems contrary to the Metro Board Motion. In an effort to improve mobility, it would be beneficial to look comprehensively at the transportation system to improve transportation options for all users as established in the Metro mission, vision, values, and goals. This requires a balance between the reducing killing cars and encouraging multi-modal modes of transportation to reduce automobile dependency.

Metro staff has stated that the recommendation to approve only capacity enhancing projects is attributed to the Purpose and Need Statement for the SR-710 North Project. However, the Purpose and Need Statement does not limit the project scope to vehicular capacity enhancements but stipulates that the “proposed action is to effectively and efficiently accommodate regional and local north-south travel demands in the study area... improve efficiency of the existing regional freeway and transit networks; reduce congestion on local arterials adversely affected due to accommodating regional traffic volumes; and minimize environmental impacts related to mobile sources.” Therefore, this once in a lifetime opportunity to fund regional projects should not be limited to vehicular capacity enhancements but embrace multi-modal strategies. As Caltrans acknowledged, “Numerous studies have examined the effectiveness of this approach and consistently show that adding capacity to roadways fails to alleviate congestion for long because it actually increase vehicle miles traveled.”

The Cities acknowledge that the Measure R funds dedicated to the SR-710 North Project were established under the Highway Capital Subfund; however, the selection of the TSM/TDM Alternative as the Preferred Alternative for the SR-710 North Final Environmental Impact Report/Environmental Impact Statement should result in an amendment to move the SR-710 North Project funding from the Highway Capital Subfund to the Local Return Subfund. Per Ordinance #08-01, Section 11 Amendments, Paragraph ‘t’ this may be accomplished with a vote of not less than two-thirds (2/3) of the Metro Board of Directors and is warranted as the majority of the TSM/TDM Alternative and the Mobility Improvement Projects are not highway projects but local projects that produce regional benefits. In addition, the goals of Measure R “focus on reducing congestion, improving traffic flow, improving mobility, and increasing accessibility to public transportation.”

Project Evaluation Process
It is unclear to the Cities how projects were evaluated and selected for Phase I and what the process will be for Phase II. In an effort to support regional projects and establish partnerships, the Cities have taken the initiative to meet and discuss potential impacts associated with the proposed projects. Unfortunately, many of
the cities lack the technical expertise to evaluate the collective traffic impacts. Consequently, the Cities would like to request that Metro provide written guidance on the project evaluation and selection process to help improve transparency and consistency. In addition, the Cities would like to request that the Measure R funding also be allowed to fund staffing for local jurisdictions in need of technical support to implement these projects.

In order to bolster partnership with Metro the Cities would also request the creation of a SR-710 Mobility Working Group. Public Works or Transportation Department staff from the local jurisdictions would be able to participate in the working group to provide insight on potential impacts and assist collaboratively on the management of these important mobility projects. One of the priority areas this partnership forum should focus on is formulating a SR-710 program management plan to provide increased administrative structure to implement the May 2017 Metro Board Motion.

Project Funding Process
It is unclear what specific steps are necessary to obtain a Letter of No Prejudice or funding agreement. The Cities would like clarification regarding the next steps to ensure the funding is distributed in an expedient manner. Specifically, the Cities would like to request written guidance on the next steps, expenditure plan, and reimbursement requirements that will lead to the implementation and construction of these projects.

Metro staff has offered to some cities to assist with the implementation of the proposed projects and has established that the Measure R funds will be allocated on a “one time basis.” The Cities would like to request that Metro incorporate a contingency in the cost estimates for potential cost overruns if Metro assumes a role in construction management. Any funds that are not expended may then be assigned to other mobility improvement projects in the corridor.