



January 25, 2022

California Transportation Commission
Via webinar

RE: Agenda Item 22 - 710-N - Pasadena Stub Relinquishment

Dear Chair Norton, Commissioners, and CTC staff,

As community-driven organizations committed to improving quality of life in Los Angeles County, we urge you to prioritize the health and well-being of residents of the 710-N corridor when considering and advancing the relinquishment of the 710-N “stub” and associated, Caltrans-operated streets in the City of Pasadena.

The CTC has a wonderful opportunity to work with and support the City of Pasadena, Metro, partner agencies, and community stakeholders to reconnect communities torn apart by the 710-N, including the “stub” area and corridor south of California Blvd, which needs to be included and relinquished to local control.

In doing so it is critical that public agencies support community-endorsed, balanced projects that will enhance public safety, public health, equity, and regional mobility, as well as restore neighborhoods harmed by prior 710-N projects.

Recent 710-N History

Following the 2017 Metro Board motion to advance the TDM/TSM alternative for the 710-N corridor, in 2018 the City of Pasadena submitted a relatively balanced, diverse project list to Metro Los Angeles that was informed by community input and planning, only to see it rejected in an opaque funding process that did not even include project scoring by Metro highways department staff. With \$240 million in funding to be reallocated from the California Boulevard grade separation project, it is imperative that Metro address the mistakes of the prior process and award projects that are multi-benefit, enjoy strong community support, and begin to address the decades of harm associated with the razing of entire neighborhoods to build the “stub” and destruction of neighborhood streets. Further, Metro should consider top-tier, high impact projects from the City of Pasadena’s latest planning efforts, including but not limited to the pedestrian plan update. In the first 11 months of 2021 six people have been killed, and fifty-five injured, in traffic collisions while walking in Pasadena. These projects should include at a minimum the following, with costs updated to reflect increases since list submission in 2018.

Previously submitted projects | City of Pasadena (Total: \$106 million)

- **Pasadena Avenue / St. Johns Avenue Complete Streets**
- **I-210 Ramp Modifications (Del Mar Ave)**
- **Electric Transit Buses**
- **Bicycle Transportation Action Plan Projects**
- **Allen and Hill Avenue Complete Streets**
- **The Arroyo Link - Protected Multi-Use Path**

New, community-supported projects

- **I-210 Stub Mitigation / Repurposing** (“Reconnecting Communities”)
- **Pasadena Pedestrian Plan Priority Projects**

2018 Pasadena 710-N Project List

In 2018, in response to a Metro request for projects serving a range of mobility needs, the City of Pasadena developed a diverse project list that was designed to support the goals and intent of the original 2017 Metro Board motion. The list was composed of the following projects, five of which were subsequently recommended for funding by Metro Highways staff, and one of which (Gold Line Grade Separation) the Pasadena City Council elected not to move forward with in 2021. As the table makes clear, only projects within Categories 1 and 2 of the Metro call for projects were awarded funding, whereas the County and City of Los Angeles was awarded funding for Category 3 and 4 projects.

	Requested Projects (Pasadena)	Metro Recommended Projects (Pasadena)
1. Intelligent Transportation System (ITS) Projects		
Gold Line At-Grade Crossing Enhancements	\$1,000,000	
Pedestrian and Bicyclist Automated Data Collection	\$1,000,000	
High Resolution Traffic Signal Data - Citywide	\$9,000,000	

Walnut Street Corridor Upgrades	\$4,100,000	\$4,100,000
Fair Oaks Avenue / Bellevue Drive Signalized Intersections	\$850,000	\$850,000
ITS Projects and Traffic Flow Improvements within affected SR-710 Corridors (Orange Grove, Colorado, Green, Holly and Hill)	\$3,800,000	\$3,800,000
2. Local Street / Road and Freeway Local Interchange Mobility and Operational Improvement Projects		
I-210 Corridor Expansion	\$5,000,000	
210 Ramp Modifications / Operation Street Improvements	\$50,000,000	
Pasadena Avenue / St. Johns Avenue Complete Streets	\$15,000,000	
Allen Avenue Complete Streets	\$2,000,000	
Hill Avenue Complete Streets	\$2,000,000	
Avenue 64 Complete Streets	\$2,000,000	
Gold Line Grade Separation at California Boulevard (Round 1 and 2 requests combined)	\$230,500,000	\$230,500,000
St. John's Capacity Enhancement Project	\$2,600,000	\$2,600,000
3. Transit Projects		
Rapid Bus Improvements	\$10,000,000	
Rose Bowl Shuttles	\$400,000	
Student Transit Passes	\$400,000	
Electric Transit Vehicles	\$28,000,000	
Short Range Transit Plan	\$9,000,000	
Transportation Operations and Maintenance Facility	\$33,000,000	
4. Active Transportation Projects		
Bicycle Transportation Action Plan Projects	\$5,000,000	
The Arroyo Link - Protected Multi-Use Path	\$2,000,000	
Bikeshare Expansion	\$400,000	
Mobility Hubs	\$10,000,000	
5. Local Street Intersection Improvement Projects		
None		
6. Maintenance / Rehabilitation Projects		
None		
7. Studies		

None		
8. Parking Structure		
None		
TOTALS	\$427,050,000	\$241,850,000

2014 Metro Board Adopted 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 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**, and work in “coordination with other departments, agencies, and jurisdictions to maximize opportunities for Complete Streets, connectivity, and cooperation”.

2017 Metro Board 710 Motion by Directors Fasana, Barger, Solis, Garcetti, and Najarian 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.”

In response, corridor cities submitted over \$425 million in requests for transit and active transportation improvements. These projects were aimed at reducing vehicle miles traveled, air pollution, greenhouse gas emissions, and preventable traffic collisions and deaths. Yet the vast majority were unfunded; only the City and County of Los Angeles received funding for local transit and active transportation projects.

2021 Modernizing Metro Highways Motion

On June 24, 2021 the Metro Board of Directors adopted a motion to grant local cities and municipalities greater flexibility and control over how sales tax measure highway funding is spent on local streets. This flexibility is designed to support cities working to address public safety, public health, equity, and climate goals directly connected to transportation spending. This board adopted policy is another direct example and direction to staff that cities have the authority to incorporate street safety improvements into local projects funded with Measure R/M sales tax dollars.

The motion recognized that **when Metro Highway Funding is used on local streets, it impacts all road users, including older adults, children, and mobility-impaired residents who walk along and across streets to access local schools, community sites, and**

businesses. Transportation “improvements” should not make local streets more difficult or dangerous to cross by foot. This is particularly important in Los Angeles County, where traffic crashes are the number one cause of premature death for children aged 5-14.

Alignment with Local and State Climate Goals

To date Metro staff has prioritized projects designed to improve “**Level of Service (LOS)**” rather than reduce “**Vehicle Miles Traveled (VMT)**”, the statewide standard for planning and an approach adopted by Pasadena in 2014. This shift was made recognizing the science behind ‘induced demand’, including the Office of Planning and Research’s guidance that “each percent increase in lane miles results in a 1.03 percent increase in vehicle travel”¹.

In 2022 Metro should no longer prioritize projects based on Level of Service, an outdated approach that is at odds with Metro’s own mission as well as Pasadena and California climate goals. Projects should be evaluated and selected based on their ability to reduce VMT and increase mobility for all. This is particularly important as the transportation sector is the number one source of Greenhouse Gas (GHG) emissions locally, regionally, and statewide.

It is critical that future transportation investments and planning respond to the science at a moment when focused action is imperative; the California Air Resources Board has found that *Los Angeles County is failing to reduce emissions from the transportation sector.*² The time to bring our transportation spending in line with our safety, health, and climate goals is now.

Thank you for your time and consideration of these issues,

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¹ Governor’s Office of Planning and Research. Technical Advisory on Evaluating Transportation Impacts in CEQA. Page 29. Accessed 11/3/2021: http://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf.

² 2018 Progress Report, California’s Sustainable Communities and Climate Protection Act https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf

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Metro Board Adopted Complete Streets Policy (2014) - Policy Statement

The principles below guide Metro's core commitments to include the needs of all users, regardless of how they travel, into the everyday decision-making process. Source:

http://media.metro.net/projects_studies/sustainability/images/policy_completestreets_2014-10.pdf

1. **Complete Streets Serving All Users and Modes.** Metro expresses its commitment to work with partner agencies and local jurisdictions to plan and fund Complete Streets that provide safe, comfortable, and convenient travel along and across streets (including streets, roads, transit facilities, highways, bridges, and other portions of the transportation system) through a comprehensive, integrated transportation network that serves all categories of 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. It may be ineffective to enhance all streets to accommodate all modes equally. Modal priorities may need to be established for key arterials based on context sensitive evaluations, public feedback, and a review of relevant data. Some streets may be prioritized for transit travel, others for walking, bicycling, vehicle travel, goods movement, or other types of modes. Some streets may have robust facilities that accommodate all modes; however, a number of streets might not contain all these features due to physical right of way constraints, connection with local context, and other considerations. However, all streets will allow for safe travel within an integrated transportation network.
2. **Context Sensitivity.** In planning and implementing transportation projects, Metro departments, partner agencies, and funding recipients will maintain sensitivity to local conditions in both residential and business districts as well as urban, suburban, and rural areas, and will work with residents, merchants, and other stakeholders to ensure that a strong sense of place ensues. Improvements that will be considered shall contribute to safe travel for all users and be consistent with best practices, such as the Metro First/Last Mile Strategic Plan, NACTO Urban Street Design Guide, NACTO Urban Bikeway Design Guide, Los Angeles County Model Design Manual for Living Streets, or equivalent.
3. **Complete Streets Routinely Addressed by All Departments.** All relevant departments at Metro, partner agencies, and funding recipients will work towards making Complete Streets practices a routine part of everyday operations; approach every relevant project, program, and practice as an opportunity to improve streets and the transportation network for all categories of users; and work in coordination with other departments, agencies, and jurisdictions to maximize opportunities for Complete Streets, connectivity, and cooperation.
4. **All Projects and Phases.** Complete Streets infrastructure sufficient to enable reasonably safe travel along and across the right of way for each category of users will be incorporated into all planning, funding, design, approval, and implementation processes for any transit and highway planning and design, new construction, reconstruction, retrofits, rehabilitations, and capital grant programs, except that specific infrastructure for a given category of users may be excluded if an exception is approved via the process set forth in the "Exceptions" section of this policy. Even for projects with limited scope, opportunities to implement incremental improvements leading to long-term accommodations for all users shall be incorporated. In new Metro corridor projects,

intermodal connectivity elements shall be an intrinsic part of the project's scope in environmental documents, to the extent required, and project definition for construction.

Implementation

1. **Design. Metro will design and evaluate projects using the latest design standards and innovative design options**, with a goal of balancing user needs. Metro strongly encourages partner agencies and Metro fund recipients to use the best design guidelines and standards to foster safe travel for all users.
2. **Network/Connectivity.** Metro will work with partner agencies and local jurisdictions to incorporate Complete Streets infrastructure into transit and highway planning and design, new construction, reconstruction, retrofits, rehabilitations, and Metro capital grant programs to improve the safety and convenience of all users, with the particular goal of creating a connected network of facilities accommodating each category of users, and increasing connectivity across jurisdictional boundaries and for anticipated future transportation investments. Transportation facilities are long-term investments that shall anticipate likely future demand for walking, bicycling, and transit facilities and not preclude the provision of future improvements. These facilities should address the need for pedestrians and bicyclists to cross corridors as well as travel along them; this may include, but is not limited to, addressing the need along an adjacent corridor. Even where pedestrians and bicyclists may not commonly use a particular travel corridor that is being improved or constructed, key points should be identified for cross corridor accessibility. Therefore, the design of intersections, interchanges and bridges shall accommodate bicyclists and pedestrians in a manner that is safe, accessible, and convenient.
3. **Implementation Next Steps.** Metro will take the following specific next steps to implement this Complete Streets Policy:
 - A. Plan Consultation and Consistency:** Maintenance, planning, and design of projects affecting the transportation system will be consistent with local bicycle, pedestrian, transit, multimodal, and other relevant plans.
 - B. Stakeholder Consultation:** Develop and/or clearly define a process to allow for continued stakeholder involvement on projects and plans including, but not limited to, local bicycle and pedestrian advisory groups, transit riders and operators, accessibility advisory groups, automobile interests, movers of commercial goods, businesses, residents, emergency responders, and/or other stakeholders, as defined necessary to support implementation of this Complete Streets policy by Metro. Consultation with these stakeholders is part of the overall project outreach effort.
4. **Performance Measures.** Metro will develop additional performance metrics and track progress toward achieving sustainability policies and priorities, including Complete Streets implementation, which will be included in the annual Sustainability Report developed by the Countywide Planning and Development Department. In addition, all relevant capital grant funding recipients shall perform evaluations of how well the streets and transportation network planned, designed, implemented, and funded by Metro are serving each category of users by collecting baseline data and collecting follow-up data after project implementation. This requirement has been incorporated into the 2015 Call for Projects cycle and will apply to all subsequent capital grant funding program cycles.