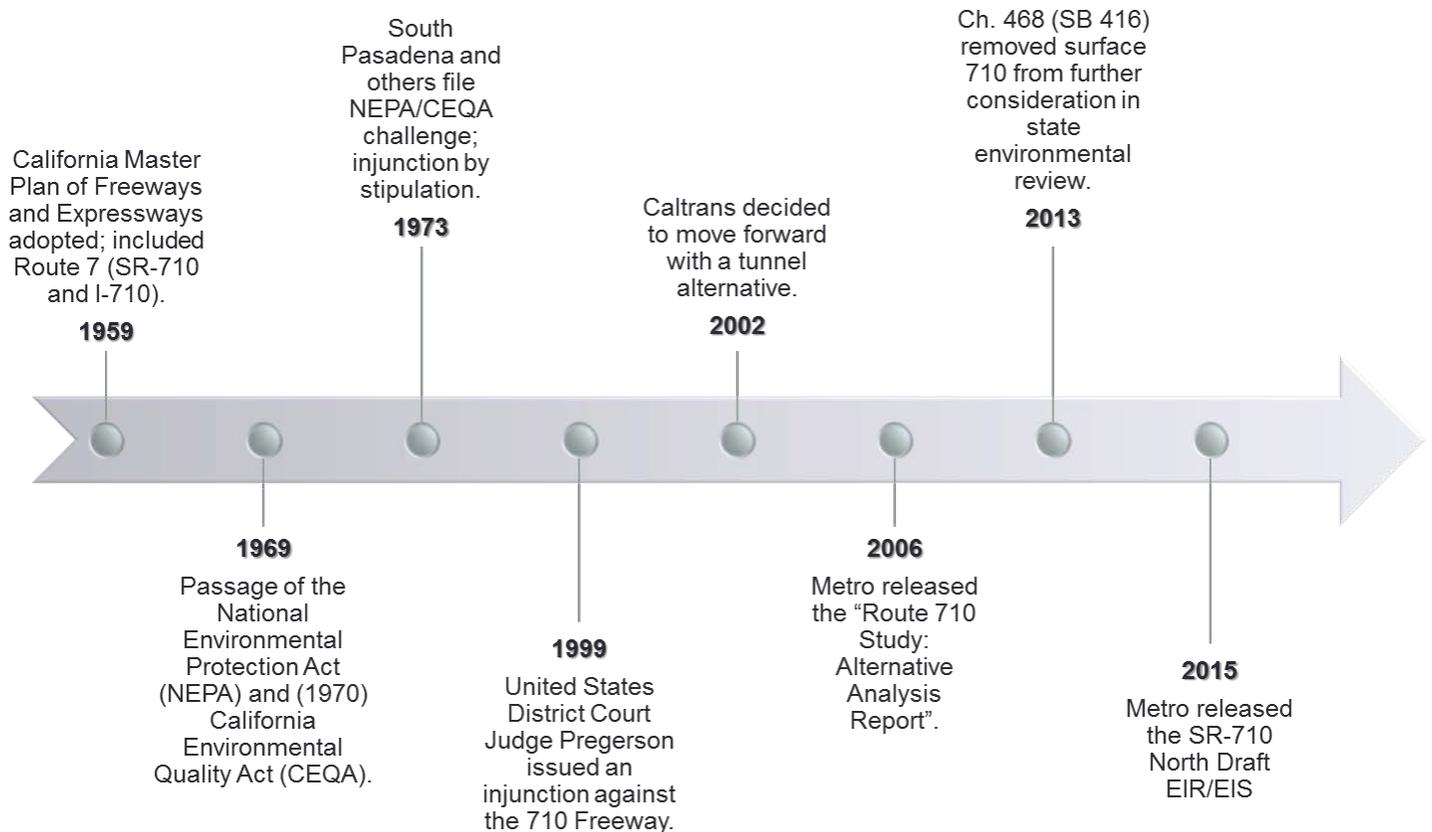


State Route 710 North Project: Issues and Concerns

Background and History:

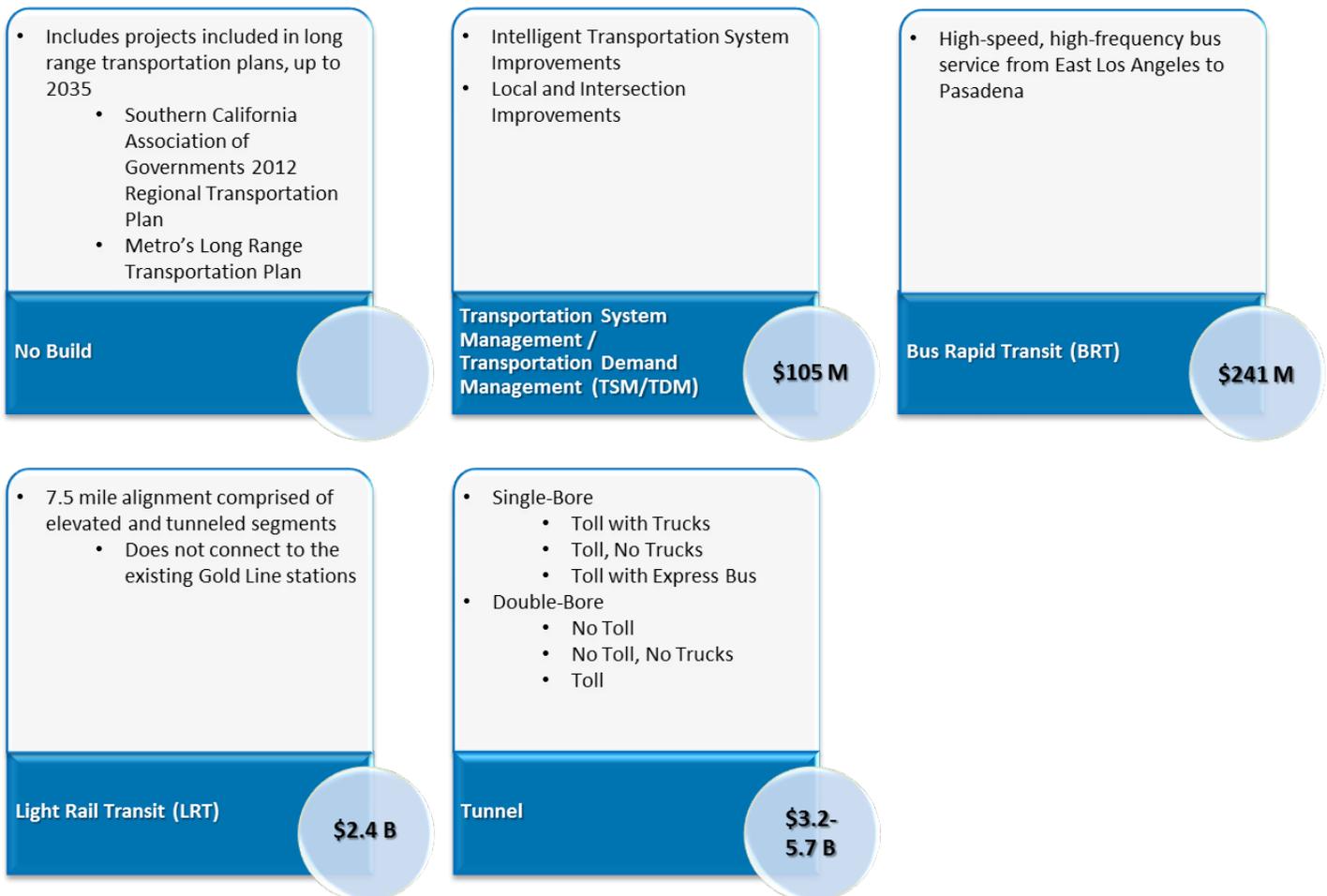
The history of the State Route 710 (SR-710) dates back to 1959, when Route 7 (now known as SR-710 and I-710) was included in the California Master Plan of Freeways and Expressways. The original route was proposed as a surface freeway that would result in significant negative impacts to the communities of El Sereno, Pasadena, and South Pasadena. After decades of litigation the SR-710 surface route was removed from further consideration. Since then, Caltrans failed to provide an accurate description of the existing conditions in the study area and has decided to move forward with a Tunnel Alternative. Conversely, the San Gabriel Valley Council of Governments Mobility Matrix identified that “about 70 percent of weekday person trips consist of trips occurring entirely within the San Gabriel Valley” indicating that the true transportation need of the region is east-west, not north-south.



SR-710 North Draft EIR/EIS Alternatives:

Metro claims that the Purpose and Needs of the project is due to “The lack of continuous north-south transportation facilities in the study area... The purpose of the proposed action is to effectively and efficiently accommodate regional and local north-south travel demands in the study area of the western San Gabriel Valley and East/northeast Los Angeles”. This flawed Purpose and Needs statement fails to establish an actual purpose and need, but misleadingly illustrates observations about the corridor. The antiquated statement represents outdated principals of transportation planning that favors the development of additional traffic lanes and fails to address the transportation, air quality, and economic development needs of the region. Consequently, the poorly designed alternatives are unable to compete with a tunnel alternative.

The SR-710 North Study Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) released by Metro in March 2015, includes numerous deficiencies and areas of non-compliance with the California Environmental Quality Act and National Environmental Protection Act.



“...ensuring a safe, financially sustainable, world-class multimodal transportation system that reduces congestion, improves the environment, and facilitates economic development through the efficient movement of people and goods ” -- California Transportation Commission Mission Statement

Air Quality:

The following issues and concerns have been identified:

- Proposed tunnel would increase Vehicle Miles Traveled and Greenhouse Gas Emissions, conflicting with recent climate change legislation
- Failed to provide adequate air quality analysis for the construction and operation of the Tunnel Alternative
- Failed to provide Hot Spot Analyzes
- Failed to adequately analyze Sensitive Receptors (including 30 AQMD thresholds)
- Failed to analyze local air quality impacts and does not address the increased risk of cancer by 149 in 1 million
- Failed to include all areas potentially impacted by this project or cumulative impacts from other projects
- Failed to provide an adequate Health Risk Assessment

South Coast Air Quality Management District (AQMD) - “...very concerned about the inadequate analysis of two key aspects of the CEQA document. First, the Health Risk Assessment (HRA) for the project shows that the tunnel alternative will present a significant health risk to local residents when compared to a No Build scenario, however the Draft EIR/EIS concludes that this impact is less than significant, and no mitigation is required. Second, localized air quality impacts are not adequately analyzed, and decision-makers would not be able to use the EIR/EIS as written to determine if the project will adversely affect air quality in the local area.”

Los Angeles County Department of Public Health (DPH) - “Potential disease impacts from this project include cancer; cardiovascular disease; asthma and other respiratory diseases, impaired child lung development; adverse pregnancy outcomes such as birth defects and low-birth-weight births; obesity and diabetes; and neurological disease. Automobile-oriented transportation projects often limit active transportation modalities such as walking and bicycling, and raise the risk of injuries to pedestrians and cyclists.”

Shute, Mihaly & Weinberger - “The DEIR/S concludes that the freeway tunnel alternatives would result in a substantial regional benefit for public health. Yet, in direct contrast to this finding, the DEIR/S’s technical appendix discloses that the freeway tunnel alternatives would cause localized cancer increase due to added vehicle emissions.”

Environmental Justice:

The following issues and concerns have been identified:

- Proposed tunnel would only benefit 13.7 percent of peak period traffic in the study area
- Potential community impacts from the above-ground portion of the LRT Alternative
- Failed to provide adequate mitigation to prevent the displacement of residents
- Failed to include the community of El Sereno

Westridge School - "...the contradictory and incomplete assessment in the Draft EIR fails to address the health risks to sensitive populations, such as Westridge School's students, near the portals and thereby violates CEQA."

Geotechnical:

The following issues and concerns have been identified:

- Proposed tunnel would cross multiple active earthquake faults
- Failed to utilize the most robust tunnel design
- Failed to provide accurate identification of the type of TBM that will be utilized
- Failed to provide a contingency plan for potential tunnel boring machine (TBM) failures
- Failed to identify potential ground settlement as a significant impact

Historic Resources:

Identified the following issues and concerns:

- Failed to accurately identify the potential impacts to historic resources
- Failed to provide scientific and factual data to determine whether there will be a significant direct or indirect impact
- Failed to identify potential risks to historic resources in the event that the TBM breaks down

National Trust for Historic Preservation (NTHP) - "In general, the Draft EIR/EIS fails to adequately evaluate the adverse impacts and risks of the construction and operation of the proposed project. We are especially concerned about the Freeway Tunnel Alternative and the LRT Alternative... the Trust named South Pasadena, Pasadena and El Sereno to its annual list of America's 11 Most Endangered Historic Places, for five consecutive years, shining a national spotlight on the devastating threat posed to historic communities within the corridor from the proposed 710 freeway extension."

Hydrology:

The following issues and concerns have been identified:

- Failed to disclose the amount of water use
- Failed to provide adequate groundwater leakage mitigation measures
- Failed to evaluate impacts on groundwater basins such as the Main San Gabriel Basin
- Failed to provide water quality mitigation measures

Legal Requirements:

The following issues and concerns have been identified:

- Caltrans unlawfully delegated its legal responsibility for environmental review to Metro
- Failed to provide analysis and data to support the Purpose and Needs Statement
- Failed to determine Thresholds of Significance and Determinations of Significance
- Failed to adequately describe the project design and impacts
- Failed to identify a preferred alternative or environmentally superior alternative
- Failed to provide critical environmental studies and analysis

United States Environmental Protection Agency (EPA) - "... we have rated the Freeway Tunnel Alternative as "3" - Inadequate Information, and recommend preparation of a focused Supplemental Draft EIS..."

Transportation

The following issues and concerns have been identified:

- Increased vehicular travel and traffic congestion
- Failed to adequately estimate truck traffic
- Failed to address induced demand
- Failed to evaluate construction impacts and underestimates the number of years for completion

Keck School of Medicine at University of Southern California (Department of Preventive Medicine) - "...particularly concerned about the increased number of vehicles (and their emissions) that will choose to use a tunnel, if it is selected as an alternative, and the lack of attention in the DEIR/EIS to the increased emissions on the SR-710 north of the SR-60 Freeway up to the south tunnel portal

United States Environmental Protection Agency (EPA) - "EPA believes that transit options in conjunction with regionwide zero- and near-zero emissions corridors, can collectively contribute to long term strategies for improved air quality..."

Nelson\Nygaard Consulting Services - "... the freeway tunnel alternatives unilaterally result in increased VMT, directly contradicting State and regional efforts to reduce greenhouse gas emissions."

Elected Officials:

The following issues and concerns have been identified:

- The three cities that the proposed Tunnel Alternative will run under (Los Angeles, Pasadena, and South Pasadena) have adopted resolutions and/or official positions against the Tunnel Alternative

Congressman Adam Schiff, 29th District - "...a tunnel would be cost prohibitive and detrimental to the communities overall..."

Senator Carol Liu, 25th District - "This misleads both policymakers and the public."

Assemblymember Chris Holden, 41st District - "The entire system of moving people and goods across Southern California is broken. Given that the proposed projects in the SR 710 North study cost hundreds of millions, if not billions of dollars any alternative chosen should improve the existing system as to remedy congestion across the region and not just in a narrow four-mile corridor. If none of the alternatives can achieve meaningful improvements in mobility, then Caltrans and LA Metro should consider whether a more regionalized approach is a better use of taxpayer dollars."

Mayor Pro Tem Jonathan Curtis, La Cañada Flintridge - "...the current situation is not tolerable, and something must be done. Unfortunately, the Caltrans/Metro approach is so deeply flawed that it cannot be on a basis on which to move forward. Metro and Caltrans did not really listen to the ideas that came out of the scoping sessions, which is shown by the fact that among the 100 alternatives that they examined, none of them included eliminating either the north or south stub. Caltrans and Metro must take a new look at how best to connect people to their destinations, and use transit and great streets to sustainability grow communities, and improve everyone's quality of life."

Councilmember John Harabedian, Sierra Madre - "...the 710 Tunnel would cost many billions of dollars and not promote economic development at all..."

Mayor Ara Najarian, Glendale and Los Angeles County Metro Board - "... conclusively demonstrates that the the 710 EIR is fundamentally flawed, that the tunnel is a terrible idea, and that the EIR itself is biased toward the tunnel alternative. Caltrans should scarp this process and evaluate community-based alternatives such as the Beyond the 710 Proposal which will better serve the affected communities and relieve congestion"

Councilmember Marina Khubesrian, M.D., South Pasadena and Arroyo Verdugo Steering Committee Chair - "As a family physician, I am deeply concerned about the negative health effects a 710 freeway extension would create for many communities if it went forward. The draft EIR/EIS seems to be stuck in 1950s thinking by not bothering to do a health impact analysis, and ignoring the real benefits of a modern multi-modal approach. The Beyond the 710 initiative, on the other hand, does what this analysis does not: promotes wellness, reduces pollution, relieves congestion, and better connects people to their important destinations."

Mayor Terry Tornek, Pasadena - "The tunnel project is deeply flawed, politically unpopular, and presents so many environmental, health, legal, engineering, and economic concerns that it cannot be funded, let alone actually built."

Cost Benefit Analysis:

The Cost Benefit Analysis (CBA) was presented as a decision making tool. However, there are numerous deficiencies in the CBA and areas of non-compliance with the National Environmental Policy Act implementing regulation.

The following issues and concerns have been identified:

- Failed to include the Benefit/Cost Ratio and Return on Investment financial indicators
- Failed to identify the significant impacts on the Return on Investment and Net Present Values
- Failed to include cumulative effects in the Sensitivity Analysis
- Failed to include per-mile tunneling costs in the Sensitivity Analysis
- Failed to analyze the financial feasibility of the project alternatives
- Calculates 100 years of residual benefits, but only 20 years of the cost of air pollution, GHG emissions and traffic congestion
- Overestimates the “value of time” for freeway drivers compared to transit riders
- Overestimates the benefits associated with Travel Time Savings while underestimates the costs associated with air pollution and Greenhouse Gas emissions
- Failed to address the costs of mitigation activities
- Failed to discuss sources of funding
- Failed to model low probability, high-cost events
- Failed to include health care costs
- Failed to take into account business interruption litigations

Senator Carol Liu - “This renders the results section incomplete and misleading... the CBA fails to tailor the Cal-B/C model to address community concerns regarding the proposed project, including health care costs, seismic risks, aquifer contamination, and funding sources.”

List of Comment Letters:

- 5 Cities Alliance
- Arroyo Verdugo Subregion
- Assemblymember Chris Holden
- City of Burbank
- City of Glendale
- City of La Cañada Flintridge
- City of Los Angeles - Planning Department
- City of Pasadena
- City of South Pasadena
- Congressman Adam Schiff
- Connected Cities and Communities (C3)
- County of Los Angeles - Department of Public Health
- County of Los Angeles - Department of Public Works
- El Sereno Organizing Committee
- Los Angeles Conservancy
- National Trust for Historic Preservation (NTHP)
- Natural Resources Defense Council (NRDC)
- No 710 Action Committee
- Pasadena Heritage
- Senator Carol Liu
- Sequoyah School

- Shute, Mihaly & Weinberger, LLP
- South Coast Air Quality Management District (AQMD)
- United States Environmental Protection Agency (EPA)
- University of Southern California (USC) - Keck School of Medicine
- West Pasadena Resident's Association
- Westridge School

Measure R2:

In 2008, voters approved a 30 year half-cent sales tax for the County of Los Angeles, known as Measure R, which included an Expenditure Plan that allocates funding to seven transportation categories, including: rail and bus rapid transit projects, bus operations, carpool lanes and highway improvements, local city improvements, rail operations, Metrolink projects, and Metro rail system improvements. The SR-710 North Study Draft EIR/EIS identifies Measure R as the key source of funding for the Tunnel Alternative. However, Measure R cannot be read as a commitment of the remaining \$780 million to the Tunnel Alternative. In addition, Metro is currently considering a potential transportation half-cent sales tax ballot measure in November 2016. However, the San Gabriel Valley Council of Governments (SGVCOG) Governing Board has wisely decided to remove the SR-710 North Project from their priority list of projects for Measure R2 to help ensure that voters will approve the measure. Inclusion of the controversial project could potentially turn-off voters. The fallacy of sunk-cost thinking associated with the proposed tunnel should not be allowed to continue and precious taxpayer dollars should be used to further projects that will serve the region.

Connected Cities and Communities:

The Connected Cities and Communities (C3) is comprised of cities, organizations and individuals that have come together to find the best way to relieve traffic, connect communities, promote smart growth, and help people get to their jobs, schools, shopping and recreation. The C3 created the Beyond the 710 initiative as a starting point for discussing the strategies and types of projects necessary to achieve the goal of connecting communities, increasing everyone's quality of life, and putting scarce transportation dollars to their best use. The ever-growing coalition is comprised of the Cities of Glendale, La Cañada Flintridge, Pasadena, Sierra Madre, South Pasadena, plus the Natural Resources Defense Council, the National Trust for Historic Preservation, and No 710 Action Committee.

The Beyond the 710 initiative believes that the proposed SR-710 Tunnel Alternative would not only devastate communities, but be a massive waste of taxpayer dollars. Caltrans' and Metro's own studies show that the billions of dollars needed to complete the project would not appreciably improve anyone's commute, and would further add congestion to an already overloaded freeway system. The Beyond the 710 focuses on better alternatives to the Tunnel Alternative. Land currently occupied by the north and south freeway stubs and the land in between could be developed sustainably, and provide local transit connections, more housing and recreation, and better access to employment centers and academic institutions.

What we are asking Caltrans and Metro:

- Prioritize people first
 - Sustainability (clean air, environmental protection, etc.)
 - Public Health (reducing greenhouse gases, health risks, etc.)
 - Quality of Life (economic vitality, affordable housing, etc.)
 - Transportation (Complete Streets, active transportation, etc.)
- Recognize that the State Route 710 North Project fails to meet the transportation, land use, and air quality needs of the region
- Abandon all the Alternatives
 - Beyond the 710 supports public transit, transportation system management and transportation demand management (TSM/TDM), but not the Transit Alternative nor the TSM/TDM Alternative evaluated in the Draft EIR/EIS
- Begin developing and evaluating a community based, sustainable, multi-modal transportation plan, such as the Beyond the 710 or West Pasadena Residents Association Connecting Pasadena Plan
 - Facilitate public input to develop a community based project