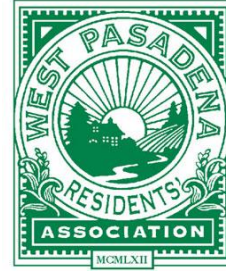


Date: August 4, 2015

To: Via Email and USPS
Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning
Department of Transportation, District 7
100 S. Main St, MS-16A
Los Angeles, CA 90012



Reference: State Clearinghouse Number: (SCH#) 1982092310
File number: 07-LA-710 (SR 710)
Caltrans Project No.: EFIS 0700000191 (EA: 187900)
Title: State Route 710 North Study

Subject: SR-710 Draft Environmental Impact Report (EIR) / Draft Environmental Impact Statement (EIS)

Attachment: West Pasadena Residents' Association (WPRA) Response to the SR-710 DEIR / DEIS

Dear Mr. Damrath,

The West Pasadena Residents' Association (WPRA) appreciates the opportunity to review and comment on the State Route 710 (SR-710) North Study Draft Environmental Impact Report and Environmental Impact Statement (EIR/EIS). WPRA is an all-volunteer organization dedicated to maintaining and enhancing the character of Southwest Pasadena and the quality of life throughout Pasadena. We represent 7,000 households and have nearly 1,000 dues-paying members. Because the SR-710 Study Project will have a very large and permanent impact on our community, our Board of Directors and a volunteer team of experts have reviewed the SR-710 DEIR/DEIS released on March 6, 2015. The purpose of this letter is to formally submit our Findings of Inadequacy for this report by means of the attached document 'WPRA Response to the SR-710 North Study Draft EIR/EIS', August 3, which can also be found on the WPRA website at www.wpra.net. We ask that this letter and report be put into the administrative record and that we receive complete responses as stipulated by CEQA and NEPA. We find that the SR-710 DEIR/DEIS is completely inadequate and ask that deficiencies identified be corrected and that a new Draft EIR/EIS be circulated.

The approval of Measure R in November of 2008 presented an exciting opportunity for Los Angeles County to improve its transportation infrastructure in a meaningful way. Unfortunately, we believe that Metro has squandered this opportunity and has not seriously considered environmentally responsible and feasible alternatives to meaningfully address regional transportation issues in the SR-710 Study Area.

From its inception, the SR-710 Study environmental process has been improperly conducted. The project definition is unstable and distorted. The SR-710 and I-710 projects have been

improperly segmented, preventing the public and stakeholders from fully understanding the entirety of the project and its co-related impacts. The Project Need statement also is unstable. The Draft EIR/EIS has a different Project Need statement than what was presented in the Alternatives Analysis Report. This substitution was made without explanation. Such tactics call into question the validity of the alternatives selection process. Furthermore, the Project Need is based on flawed assumptions and is not justified by the data presented. Instead, it is based on an out-of-date, pro-automobile, pro-speed paradigm that erroneously assumes that highway building in and through cities reduces congestion and increases mobility. In addition, it also fails to consider changing public, state and national priorities to reduce greenhouse gas emissions. It completely ignores the California state law SB743, which calls for the “reduction of greenhouse gas emissions, the development of multi-mode transportation networks, and a diversity of land uses”. Finally, the environmental process has failed to adequately address the Project Need for safety. For the tunnel alternative, safety has been grossly compromised in order to achieve the desired performance and cost objectives.

The EIR process also has been conducted in a manner to justify and sustain a decision already made: the freeway tunnel as the preferred alternative. Both the Metro organization and board members have historically advocated for the tunnel. Metro’s favoritism continues in the Draft EIR/EIS with the biased selection of the Study Area boundaries and alternatives, the biased bundling of options, the deferral or complete failure to address large environmental impacts for the tunnel alternative, data averaging, and the selective presentation and manipulation of data.

The SR-710 Analysis of the Alternatives is also grossly deficient. For example, the SR-710 Study failed to consider a multi-mode alternative, despite numerous community inputs to do so during the scoping process. This is egregious particularly in light of the 1999 injunction prohibiting a 710 surface freeway extension due to Caltrans’ failure to consider a multi-modal low build alternative. The alternative selection criteria only considered north-south corridors rather than the efficiency of the transportation network as a whole. The Glendale region – a primary source of the 710 tunnel traffic according the Metro – was excluded from the Study Area; consequently, Glendale/Burbank options were not considered. In addition, options that provide meaningful LRT and BRT connectivity and broader area service were ignored. The TSM/TDM alternative fails to address safety and connectivity issues associated with the ‘210 stub’ in Pasadena and the termination of the 710 freeway in El Sereno. Remnants of historic 710 extension aspirations, these transportation and safety nightmares have divided and plagued these communities for more than a half century. Moreover, the Draft EIR/EIS proposes several tunnel alternative options that we do not find credible. This includes the ‘no truck’ option, which is not enforceable either in the near term or future, and the single-bore tunnel option, which is not reasonable because it exceeds margins of safety and passes unacceptable fire and accident risks onto tunnel users.

The Draft EIR/EIS environmental impact assessment is also grossly flawed. It lacks sufficient information to substantiate many claims and defers decisions and analyses required for a credible and dispassionate environmental impact evaluation. For many technical areas, it fails to establish the criteria for significant environmental impacts; consequently, claims of ‘no significant impact’ are not substantiated. Missing information, deferred designs and analyses, and failure to establish

criteria for significant impacts has resulted in a very immature and/or weak formulation of mitigation measures for this phase of the EIR process.

Also, we have found numerous significant Findings of Inadequacy in the Draft EIR/EIS technical assessment. Highlights are summarized below:

3.1 Land Use

- Acceptable mitigations for many Land Use related environmental impacts were not provided.
- The report assumes that local General Plans, local land use plans, and state, regional and local transportation-related plans will be modified to implement the Build Alternatives without justification. It does not consider the possibility that requests for modifications may be denied.
- The report fails to acknowledge that the proposed ventilation tower(s) will have substantial adverse impacts on a number of scenic vistas, will substantially damage scenic resources, and, will substantially degrade the existing visual character and quality of the site and its surroundings. This in turn will have substantial adverse impacts on Cultural Resources, specially the Old Pasadena National Register Historic District.

3.2 Growth

- Growth data are misrepresented and grossly overstated. Some data is irrelevant to the study area and the anomalous 2008 recession year was used as the base year for calculating growth. The report fails to acknowledge documented declining growth rate trends in Los Angeles County.
- The report fails to properly assess growth-induced environmental impacts related to goods movement, expanded freeway capacity and changes in traffic patterns.

3.3 Community Impacts

- The report fails to acknowledge the City of Pasadena as a ‘site of cultural significance’ or address impacts to the community’s identity, tourism and economic vitality if the tunnels are built. For example, impacts to the Tournament of Roses Parade, the Norton Simon Museum and Old Pasadena are not addressed.
- The economic impact analysis dismisses indirect effects of the build alternatives and presents misleading results. It fails to recognize the unique economic impacts for the tunnel alternative and trivializes the consequences of business relocations, especially in Environmental Justice communities. Also, the report dismisses the disproportionate impacts of construction for the communities of Pasadena, El Sereno and Monterey Park – approximately 22% of all Pasadena employees are expected to have a ‘high likelihood of disruption’. Moreover, the economic impact analysis improperly uses the project cost as the only determining factor for employment calculations; consequently the report is biased in favor of the most expensive alternatives. Finally, the report fails to either recognize or assess the impacts to the ‘Tri-Cities’ economic region, which includes Pasadena, Glendale and Burbank.
- The report fails to properly identify issues, environmental impacts, or mitigations related to Disadvantaged Communities in the Study Area, and has both failed to inform, and misinforms, these communities in a manner that perpetuates environmental injustice. The accepted CalEnviroScreen tool was not used to properly identify Disadvantaged Communities. For example, Northwest Pasadena has been ignored. Impacts on

unincorporated counties (e.g. El Sereno and East Los Angeles) have been trivialized because of improper screening methods and the proposed elevated LRT line in Los Angeles is a burden to that community. Moreover, tunnel tolls place a disproportionate economic load on the ‘disadvantaged’ who have been assigned a minimal value in the cost benefit analysis because they are more likely to use transit.

3.4 Utilities / Emergency Services

- The utility impact analysis is limited to facility relocation analysis. It does not describe the size, appearance or location of required electrical facilities such as electrical substations, or the adequacy of transmission and distribution facilities, or the sources of power.
- It’s unclear where water used for construction and de-watering will come from or how it will be disposed. This is especially crucial given the drought emergency in Southern California.
- The report fails to analyze the Huntington Memorial Hospital Master Development Plan Amendment and does not adequately analyze impacts on emergency services near the tunnel portals.
- The tunnel alternative fails to incorporate reasonable options for first responder safety and tunnel access/egress.

3.5 Traffic and Transportation / Pedestrian and Bicycle Facilities

- It is not demonstrated that the Tunnel Alternative is consistent with local, regional and state transportation strategies, especially SB743, which calls for the reduction of greenhouse gas emissions, development of multi-mode transportation networks, and mass-transit responsive land uses.
- The report indicates that the SCAG traffic model has not been validated and adjustments made to the Heavy Duty Truck Model were not adequately explained.
- The traffic analyses are flawed and deficient. They fail to properly analyze spillback and bottlenecks, induced traffic, tolls and toll diversion, ramp metering, intersections and segments near the tunnel portals, emergency services near the tunnel portals, cut through traffic along the Pasadena Ave. / Saint John Ave. / Fremont corridor, and parking impacts.
- Traffic models and analyses are based on outdated population and automobile traffic growth estimates and ignore current and future generational transportation trends.
- The report fails to support claims that the Tunnel Alternative will reduce traffic on local streets and in neighborhoods.
- Impacts due to shifting traffic patterns are minimized. This includes, but is not limited to changes in land use, development, and demographics.
- The LRT alternative is very limited in scope and the design provides inconvenient connections with the Gold Line north and south.
- The TSM/TDM alternative fails to address safety and traffic issues at the ‘stubs’ in Pasadena and El Sereno.
- The report fails to assess Tunnel Alternative impacts on Rose Bowl Stadium traffic.

3.6 Visual / Aesthetics

- The Visual Impact Analysis (VIA) failed to adequately consider Pasadena’s rare and unique visual attributes and underestimates the Tunnel Alternative environmental impacts.
- Key Views studied do not reflect high-impact views in Pasadena.

- A VIA of the north tunnel portal cannot be made because the design and location of the electric substation and ventilation towers have been improperly deferred.
- The report improperly minimizes the visual impacts of Tunnel Alternative sound walls.
- Visual impacts during the years-long tunnel construction are trivialized and mitigations are deferred.
- The VIA fails to consider the reasonable possibility of a TBM breakdown and repair operation from above ground.

3.7 Cultural Resources

- The report fails to identify Pasadena as a ‘site of cultural significance.’
- Note: The WPRA adopts and incorporates the comment submitted by both Pasadena Heritage and the National Trust for Historic Preservation.

3.8 Hydrology and Floodplain

- Encroachment on the Laguna Regulating Basin is inadequately addressed and there is insufficient information to conclude that adequate downstream drainage capability exists to accommodate the build alternatives.

3.9 Water Quality and Storm Water Runoff

- Insufficient information was presented to ensure that tunnel construction would not compromise the Raymond and San Gabriel water basins.
- Contamination of wells and disposal of water used during tunnel construction was not adequately addressed.

3.10 Geology/Soils/Seismic/Topography

- For the LRT and Freeway Tunnel Alternatives, the Draft EIR/EIS fails to establish either environmental impacts or significance criteria for ground settlement cause by tunnel boring.
- Tunnel seismic design criteria have not been established. Key geological/seismic designs, investigations and analyses have been inappropriately deferred until after the alternative selection is made.
- Seismic modeling performed to date is inadequate to determine the feasibility and safety of the Freeway Tunnel Alternative, and meaningful modeling has been deferred until after the alternative selection is made.
- There is no evidence that geological/seismic lessons learned from historic tunnel seismic events were adequately considered or incorporated into tunnel designs.

3.13 Air Quality

- The air quality analysis does not adhere to generally accepted policies and practices followed by California air quality and health agencies for analysis of Mobile Source Air Toxic (MSAT) impacts on near roadway residential areas. The report also uses outdated guidance for the calculation of cancer risks; consequently, cancer risk estimates are underestimated.
- Quantitative Hot-Spot Analyses have been improperly deferred until after the alternative selection is made.
- The MSAT Analysis improperly takes credit for air quality improvements outside the scope of the project, mischaracterizing and underestimating the negative health impacts of the freeway tunnel alternative to the public, stakeholders and decision-makers.
- The Health Risk Assessment is not conservative; health risks were assessed for the year with the lowest MSAT emissions.

- Inadequate information is provided to assess the air dispersion model for the Tunnel Alternative. There is very little and conflicting information on the exhaust facility location, design and air pollution control system. The model does not consider unfiltered air escaping from the tunnel exit and reduced dilution that occurs at night. Dispersion model parameters are inadequately described and a sensitivity analysis was not performed. Criteria for establishing receptor locations was not established and the location of the receptors could not be resolved with information provided; consequently, receptor air quality environmental impacts could not be validated.
- Concentrations of air pollution inside the tunnel are not discussed and may produce high health risk for regular tunnel users, or for drivers that are delayed in the tunnel due to congestion or accidents.
- The report fails to acknowledge the uncertainty of estimated emission rates and modeling results, and the values shown imply precision that does not exist.
- A Health Impact Assessment has not been performed.

3.14 *Noise and Vibration*

- The noise impact analysis indicates there will be up to an 11 dB increase in noise adjacent to the ‘210 stub’ at the north portal, which far exceeds the Federal Transportation Agency noise thresholds for allowable increases. The report also fails to recognize Ambassador Auditorium as a concert hall.
- Vibration impacts from tunnel boring were not adequately addressed. The vibration impact assessment related to tunnel blasting has been deferred until “*geotechnical information is evaluated*”.

3.15 *Energy*

- The Energy impacts analysis is confusing, lacks information and includes incorrect assumptions regarding Vehicle Miles Traveled (VMT).
- For the Freeway Tunnel and LRT alternatives, the amount of energy required for the Tunnel Boring Machine (TBM) operations is not specified. Meaningful plans for electricity provision are deferred; thus environmental impacts cannot be assessed.

3.16 to 3.21 *Natural Communities, Wetlands and Other Waters, Plant Species, Animal Species, Threatened and Endangered Species, Invasive Species*

- Current sources were not used for the identification of special status species. Animal species surveys are incorrectly reported and there are erroneous statements about wildlife corridors.
- Botanical field studies were not conducted in a manner that allows for a meaningful impact assessment. Invalid assumptions are made about rare plant persistence.
- Assertions about the habitat value of wetlands are inconsistent with Natural Environmental Study (NES) survey data.

3.24 *Construction Impacts*

- The report fails to consider the possible breakdown of a Tunnel Boring Machine (TBM) in the environmental impact analysis. Repair operations for the Seattle Alaskan Way Viaduct TBM indicate that this could result in a very large impact to communities above the tunnel route.
- A decision on the location and design of the tunnel exhaust towers and utility substation in Pasadena has been deferred.
- The tunnels are built to very minimum fire and safety standards and fail to employ features used in recently built long tunnels using lessons learned from major tunnel

disasters. The tunnels lack intermediate exits, egress routes to the surface, multiple access passages from one road deck to another and internal safe havens. The single-bore tunnel alternative lacks cross transits to and from a non-existing parallel tunnel. The proposed tunnel operations plan fails to prevent hazardous materials and vehicles from entering the tunnel portals.

- Challenges associated with transporting the TBMs from the port to the construction sites were not acknowledged. A feasibility plan, environmental impacts and costs associated with this unique and impactful construction activity were not provided.
- It was not demonstrated that the design, build and operational standards cited are appropriate for the Tunnel Alternative.

3.25 Cumulative Impacts


- The report improperly considers cumulative impacts related to numerous projects (e.g. the I-5, the I-710, I-10/I-605 Direct Connector, I-110 widening, Devil's Gate Dam, other LRT projects, etc.).
- The cumulative impacts assessment is incomprehensible. Forty projects have been identified as having cumulative impacts. The I-710 South Draft EIR/EIS alone is 26,204 pages in length.

For the reasons cited above and in the attached document, we consider the SR-710 DEIR/DEIS deficient and inadequate. We ask for a recirculation of the Draft EIR/EIS to correct for these deficiencies.

Sincerely,



Geoffrey Baum
WPRA President



Sarah Gavit
WPRA Vice-President, SR-710 Lead

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