

3.15 ENERGY IMPACT ANALYSIS

1. The energy impact analysis is biased toward the Freeway Tunnel Alternative even though the Freeway Tunnel is by far the greatest energy consumer of the alternatives analyzed in the DEIR/DEIS, NEPA (40CFR§1502.1).

The energy impact analysis in Section 3.15 concludes that none of the build alternatives energy requirements will have a significant environmental impact and offers no avoidance or mitigation measures, CEQA (§15020, §15126.2, §15126.4). The BRT and LRT alternatives consume significantly less energy than the Freeway Tunnel Alternative.

The Energy analysis incorrectly assumes that automobile vehicle miles traveled (VMT) are the same for all of the build alternatives and does not take into account that VMT would decrease under the BRT and LRT options. The purpose of a robust public transit system is to get people out of their cars.

2. For the Freeway Tunnel and LRT alternative the amount of energy for the TBMs was not specified and meaningful plans for electricity provision are deferred; thus environmental impacts cannot be assessed.

Section 3.15 does not quantify the amount of energy required by the Freeway Tunnel Boring Machine (TBM) or the LRT TBM. However, the 2014 Energy Technical Report estimates that each of two substations for the Freeway Tunnel Option would be sized at 55 MW or 5 MW beyond the CEC threshold requiring power plant permitting¹. The single LADWP substation for the LRT option is sized at 12 MW. Both documents defer all TBM energy issues to the two power companies (LADWP or Pasadena DWP) without consideration of how the two utilities will supply the power or the impact of furnishing the large amounts energy involved. Deferral of impact analyses to a later date for impacts created by a project is prohibited by CEQA (§ 15020).

3. For the Freeway Tunnel alternative, the facility design of the two proposed electricity substations has been deferred; thus environmental impacts cannot be assessed.

The specific location of each utilities proposed substation (one for LADWP and one for Pasadena DWP) is discussed in general terms and the visual impacts of the substations are not considered. The energy impact analysis in Section 3.15 is inadequate because it does not describe or reference the size, appearance or location of required electrical facilities such as electrical substations or the adequacy of transmission and distribution facilities, in violation of CEQA (§15020, §15126.2, §15126.4).

¹ Also, "Stuck in Seattle", pages 52-57, Bloomberg Businessweek, April 6-12 issue.

4. The Energy Impact Analysis is confusing and presents information that is not intuitive with minimal or incomplete explanation.

The decrease in operational energy for the single bore freeway tunnel option shown in Table 3.15.9 when compared to the No Build alternative is not intuitively obvious and deserves a more thorough explanation.

Section 3.24.15 Energy (construction impacts) is inadequate. Beginning on the 3rd paragraph of page 3.24.15 where total energy use is reported to be the same for both the single bore and dual bore Freeway Tunnel options continuing through the 4th paragraph. The last sentence in the section is incorrect and carries forward the flawed logic of promoting the environmentally inferior Freeway Tunnel Option.