

3.25 CUMULATIVE IMPACTS

1. The draft EIR/EIS Transportation Cumulative Impacts Assessment is grossly inadequate.

CEQA and NEPA both require that an EIR/EIS include a robust cumulative impacts assessment. The Draft EIR/EIS states that it analyzed potential direct and indirect impacts by “considering the impacts of the SR 710 North Study and other current or proposed actions in the area to establish whether, in the aggregate, they could result in cumulative environmental impacts.” As shown below, however, the Draft EIR/EIS cumulative impacts assessment is grossly inadequate. The cumulative impacts analysis should be completely revamped in the Final EIR/EIS.

2. The Draft EIR/EIS improperly segments the SR-710 North Project and the 1-710 South Corridor Project.

The SR 710 North Project and the 1-710 South Corridor Project end less than two miles apart, in the same corridor, with the same highway number designation. There is a current widening project in the freeway segment between them. The Draft EIR/EIS’s separate and bifurcated evaluation of the two projects is misleading and indefensible. In one contradictory reference, the Draft EIR/EIS states with respect to the 710 South project that “However, by adding highway system capacity to the goods movement infrastructure in Southern California, all of the Build Alternatives will have a beneficial effect in accommodating the forecast growth in the movement of cargo containers via truck *within the 710 corridor*.” This is clearly a reference to the entire 710 corridor. Simply put, the Draft EIR/EIS improperly bifurcates these two projects in the cumulative impacts analysis. A Finding of Inadequacy for the improper segmentation of the I-710 and SR-710 projects is documented in Section 2.1 of this document.

3. The Draft EIR/EIS improperly bifurcates I-5 Improvement Projects.

The Draft EIR/EIS also improperly considers separately a number of I-5 improvement projects that together will have substantial adverse impacts with the SR-710 North project. These projects, along with the Golden State Gateway project, should be collectively analyzed for cumulative impacts as a major regional transportation and goods movement effort.

I-5 is the one of the most important corridors in the Western U.S., ultimately connecting Baja California and British Columbia through California, Oregon and Washington. I-5 has had many completed and current capacity enhancements almost continuously from the Mexican border through Tejon Pass and into the Central Valley. Widening in San Diego and Orange Counties is mostly complete; widening between the Orange County line and I-605 is under way. Projects 2, 3, 4 and 5 (improving I-5 between I-605 and I-710 and between SR 134 and SR 118), along with the recently-completed widening of I-5 in the “Golden State Gateway” (Santa Clarita area) continue the I-5 capacity improvements to the north.

These projects leave a critical bottleneck in I-5 between I-710 and I-10. There are no current plans to widen that section of I-5, which would be very difficult and expensive to do. If an SR-710 Freeway Tunnel alternative is constructed, northbound I-5 traffic wishing to bypass this

bottleneck could use SR-710 to reconnect with I-5 at SR-134, SR-170 or SR-118. Southbound traffic north of SR-134 could also use the 710 tunnel to bypass the bottleneck. This likely contribution to SR-710 traffic, congestion, air quality and other impacts, as well as the effects of permitting or not permitting truck traffic on SR-710 North, does not appear to have been analyzed in the Draft EIR/DEIS. Therefore, it is inappropriate to conclude that these projects would not have substantial cumulative impacts.

The “Golden State Gateway Project” I-5 capacity improvement in the Santa Clarita Valley should also be considered for cumulative adverse impacts. The GSG project continues the I-5 widening efforts only a few miles north of Project 5. The GSG project was expressly identified as a goods movement enhancement project of regional significance; of necessity goods movement there is an extension of goods movement to the south, including within the SR-710 Study Area.

4. The Draft EIR/EIS improperly considers three contiguous I-5 Improvement Projects as separate projects.

The Western Avenue interchange improvement, improvements between SR-134 and SR-170, and improvements between SR-170 and SR-118 are in effect one continuous project despite their separate consideration in the Draft EIR/EIS Cumulative Impacts Assessment. This separate consideration has the effect of minimizing their cumulative adverse impacts. It is inappropriate to conclude that they would not have substantial impacts relevant to the SR 710 North study. Moreover, the Negative Declarations and Findings of No Significant Impact for these projects are now 15 years old and probably obsolete. These documents could not have considered the SR-710 North Build Alternatives since they did not exist at that time.

5. The Draft EIR/EIS improperly minimizes the cumulative adverse impacts of the I-10/I-605 Direct Connector Project and I-10 HOV lanes between I-605 and I-210.

Collectively, the I-10/I-605 Direct Connector Project and I-10 HOV Lanes between I-605 and I-210 add capacity to I-10 several miles east of the proposed SR-710 North project. Induced traffic on I-10, which connects directly to SR-710, reasonably could be expected to add traffic to SR-710. The Draft EIR/EIS improperly minimizes the cumulative impacts of these projects; a conclusion of no substantial impact is inappropriate and additional analysis is necessary.

6. The Draft EIR/EIS fails to analyze the relationship of the SR-710 tolled tunnel alternatives and the I-10 HOT lanes.

The I-10 HOT (High Occupancy/Toll) lanes are one of two HOT Lanes in Los Angeles County (the other operating on I-110). The Draft EIR/DEIS contains no discussion of how tolling would operate in the SR-710 North Freeway Tunnel Alternatives (conventional tolling, variable tolling, or HOT lanes) or whether it would be possible or beneficial to directly connect the I-10 HOT Lanes to the SR-710 tolled lanes. The southbound SR-710 currently has direct ramping to the westbound I-10 HOT lanes and El Monte Busway just north of I-10. The Draft EIR/EIS fails to discuss how this connection would operate with the SR-710 Freeway Tunnel Alternatives (with or without tolling) and does not analyze this issue for potential cumulative impacts.

7. The Draft EIR/EIS improperly dismisses the possible impacts of the I-110 Widening and Rehabilitation Project.

There is no substantive discussion of the I-110 Widening and Rehabilitation Project, which added capacity in the downtown Los Angeles area. The Draft EIR/EIS states that the environmental document is “not available for this project” – difficult to believe for a project that was completed in 2012. The Draft EIR/EIS concludes that there is “no substantial impact.” But that conclusion is unsupported and cannot be made without reference to an environmental document.

8. The Draft EIR/EIS fails to analyze current Metro LRT improvements in light of the proposed LRT build alternative.

The Draft EIR/EIS identifies the Regional Connector and proposed Gold Line Eastside and Foothill extensions as having significant impacts in a number of categories. But the Draft EIR/EIS fails to analyze the operational impacts of the proposed LRT alternative on these projects.

9. The Draft EIR/EIS improperly minimizes impacts from the 16 East California Project.

All build alternatives would facilitate access to and from this development, which includes on-site parking. But the Draft EIR/EIS only analyzes visual and paleontological impact. Impacts on Land Use, Utilities, Traffic and Transportation, and Air Quality should be assessed in the Final EIR/EIS.

10. The Draft EIR/EIS fails to analyze the Huntington Memorial Hospital Master Development Plan Amendment.

The Master Development Plan addresses the next 20 years of Huntington Memorial Hospital (HMH) development. Emergency Services impacts should be added to the EIR/EIS Cumulative Impacts Analysis. Access to HMH, especially from the north, may be impacted by the Freeway Tunnel Alternatives by removal of the California and Del Mar on and off ramps and by increased congestion in the area from freeway and potential toll diversion traffic. Ten years of construction should also be considered as a major impact. Construction impeding access roads, and blocking traffic because of construction equipment and hauling vehicles potentially are of greater concern even than the finished product.

11. The Draft EIR/EIS fails to analyze the Devil’s Gate Reservoir Project.

Depending on the timing of both projects, the Devil’s Gate sediment removal activities and the associated truck traffic could overlap with Freeway Tunnel Alternatives construction. The Final EIR/EIS should analyze the temporary cumulative impact of the Devil’s Gate Reservoir Project construction along with the proposed tunnel alternatives.

12. The Draft EIR/EIS inaccurately limits the cumulative Land Use impacts to land taken for construction and operation.

The Draft EIR/EIS Cumulative Impacts Assessment states that “none of the Build Alternatives would convert a substantial amount of land to transportation uses. Therefore, the Build Alternatives would not contribute to cumulative land use impacts.”¹ However, air quality, community character and cohesion, environmental justice, noise, and transportation and traffic, among other impacts of transportation infrastructure, also affect land uses. The effects on land uses under the Build Alternatives are not limited to merely whether land is taken for construction and operation of the alternatives.

13. The Draft EIR/EIS improperly concludes that neither the build alternatives nor the cumulative projects are growth inducing.

The Draft EIR/EIS states: “Because neither the SR 710 North Study nor any of the cumulative projects are anticipated to be growth inducing, no avoidance, minimization and/or mitigation measures are necessary.”² But there no support or analysis whatsoever in support of this conclusion. The Draft EIR/EIS expresses an improperly narrow view of growth inducement and a facile dismissal of the growth-inducing effects of transportation projects generally as well as within the Study Area. Indeed, Caltrans’ own Final EIR/EIS for the I-405 widening project in Orange County states:

Growth inducement is defined as the measurable increase in population, housing, and/or employment that can be reasonably and directly attributed to the implementation of a proposed transportation project within a given area. The growth inducement assessment examines the relationship of the proposed project to economic and population growth or to the construction of additional housing in the project area. It focuses on the potential for a project to facilitate or accelerate growth beyond planned developments, or induce growth to shift from elsewhere in the region.

The Council on Environmental Quality (CEQ) regulations, which established the steps necessary to comply with NEPA, require evaluation of the potential environmental effects of all proposed federal activities and programs. This provision includes a requirement to examine indirect effects, which may occur in areas beyond the immediate influence of a proposed action and at some time in the future. The CEQ regulations (40 CFR 1508.8) refer to these consequences as indirect impacts. Indirect impacts may include changes in land use, economic vitality, and population density, which are all elements of growth. CEQA also requires the analysis of a project’s potential to induce growth. CEQA guidelines (Section 15126.2[d]) require that environmental documents “...discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment...”³

¹ *Id.*, p. 410.

² *Id.*, p. 420.

³ I-405 Final EIR/EIS, pp. 3.1.2-1, 2.

WEST PASADENA RESIDENTS' ASSOCIATION
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The Final EIR/EIS should recognize and analyze the issues of growth inducement in the SR-710 North Study as Caltrans did in its 405 widening project.