

### **3.4 UTILITY IMPACT ANALYSIS**

**1. The utility impact analysis in Section 3.4 is limited to facility relocation analysis and fails to acknowledge the potentially greater disturbance of utility facilities associated with the Freeway Tunnel option indicating a bias toward the Freeway Tunnel that violates NEPA (40CFR§1502.1), CEQA (§15020, §15126).**

The conclusion of the analysis, that there is no impact (page 3.4-20) because all build alternatives share equal impacts, is not sufficiently supported. For example, only the Freeway Tunnel option requires the relocation of a 60 inch diameter MWD pipeline that serves a large area.

The Utility construction Impact analysis in Section 3.24.4 also fails to locate the existence of water supply wells that may be impacted by any of the tunnel boring options (LRT, Freeway). Wells with steel casings may also present problems for the Tunnel Boring Machine (TBM).

**2. The utility impact analysis in Section 3.4 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 or discuss the source of power as required by CEQA (§15020, §15126) (also see Section 3.15 Energy).**

Southern California power supplies could be limited because of the loss of the San Onofre power plant and hydro –power reductions from Hoover Dam. The Final EIR/EIS should study whether overall power supplies and transmission and distribution capacity are adequate.

**3. The DEIR/DEIS fails to specify water requirements for any of the project alternatives and meaningful plans to provide water service to the project are deferred; thus environmental impacts cannot be assessed.**

Questions XVIIIb and XVIII d<sup>1</sup> of the CEQA Initial Study cannot be answered unless the expected water use of the project is quantified. Furthermore, the answer to XVIII d concludes that all entitlements are sufficient to meet the unquantified water demand for the project. The analysis to support the “*Less than Significant Impact*” conclusion is not sufficient and defers impact analysis to the water agencies in violation of CEQA (§15020, §15126).

On April 1, 2015 Governor Jerry Brown ordered cities and towns across California to cut water use by 25% as part of a sweeping set of mandatory drought restrictions<sup>2</sup>. These restrictions continue to emphasize the seriousness and unknown duration of the unprecedented drought conditions that California continues to experience. Since imported water from either the State Water Project (SWP) or the Colorado River System will likely be part of any water supply mix,

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<sup>1</sup> **XVII. UTILITIES AND SERVICE SYSTEMS:** Would the project: b) require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

<sup>2</sup> Front page article *Brown gets tough on water*, LA Times Thursday April 2, 2015

the DEIR/DEIS document needs to confirm the availability of SWP, Colorado River Water and local water supplies in an environment of curtailments and substantial imported supply reductions<sup>3</sup>. SWP allocations have been severely limited in recent years and if the drought persists, the use of drinking water for construction purposes may not be possible.

The DEIR/DEIS wrongly concludes that water use will have a “*Less than Significant Impact*” on water utilities without key information on the level of water use. However, TBM water demands could be significant, especially if slurry capabilities are employed. Furthermore, the project could have several concrete batch plants for mixing concrete and grout. Accordingly, a more thorough explanation of expected water needs should be included and the “*Less than Significant*” finding re-evaluated.

**5. The DEIR/DEIS does not specify the capacities of solid waste disposal facilities; thus potential environmental impacts cannot be assessed.**

The answer to Question XVIII<sup>4</sup>, of the CEQA Initial Study indicates that project related solid wastes (construction and operation) will be disposed of at the Puente Hills and Scholl Canyon Landfills after waste minimization through diversion and recycling. What are the expected diversion and recycling facilities that will accept construction wastes and what are the estimated closure dates of the Puente Hills and Scholl Canyon Landfills? Also, tunnel spoil disposal relies on the *total capacity* of the Manning and Olive Pits to determine their adequacy for the project. Please verify that the volumes referenced represent the *available capacity* that can be relied upon by the project.

**5. The Draft EIR/EIS Fails to Analyze the Huntington Memorial Hospital Master Development Plan Amendment.**

The Huntington 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 this hospital, 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.

**6. The Draft EIR/EIS Fails to Adequately Analyze Impacts on Emergency Services Near the Tunnel Portals.**

In discussing permanent impacts for the Build Alternatives, the Draft EIR/EIS, pg. 3.4-19 states the following:

“In the long term, operation of the Build Alternatives would not impact access to/from the driveways of any of the emergency service facilities near such improvements. As a

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<sup>3</sup> State Water Resources Control Board notification of water right curtailments.

<sup>4</sup> **XVII. UTILITIES AND SERVICE SYSTEMS:** “Would the project: f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?”

result, the Build Alternatives would not result in adverse long-term traffic and transportation impacts at emergency service facilities. The elements included in the Build Alternatives could help to reduce congestion in the future and consequently reduce response times of emergency vehicles. “

Driveways are hardly the only important part of access to emergency facilities and the operation of emergency vehicles. Huntington Memorial Hospital, in particular, would be impacted by the removal of direct freeway access to and from California Avenue and Del Mar Avenue in the freeway tunnel alternatives, by additional traffic resulting from tunnel portal congestion and queueing, and potentially from toll evasion. Furthermore, the statement that Build Alternatives could reduce congestion and consequently reduce response times of emergency vehicles is unsupported by the document. The Draft EIR/EIS itself recognizes increased traffic and the adverse impact on the road system from the Huntington Memorial Hospital Master Development Plan. Clearly, impacts with the freeway tunnel alternative requires further analysis in the Final EIR/EIS.

### **7. For the tunnel alternative, the Draft EIR/EIS Fails to incorporate reasonable options for first responder safety and tunnel access/egress.**

A Finding of Inadequacy for the single-bore tunnel’s failure to provide adequate first responder safety and access/egress is documented thoroughly in Section 2.3 of this document. In summary, the single-bore tunnel alternative lacks cross transits to and from a non-existing parallel tunnel, egress routes to the surface, multiple access passages from one road deck to another and internal safe havens. This deficiency greatly increases the safety risk for tunnel users and first responders. Furthermore, the design

- *Increases* the time it takes first responders to arrive at the location of an incident, and
- *Decreases* the options first responders would have in order to reach an incident, and

While the SR-710 tunnel designs appear to meet the very minimum safety and access/egress standards for road tunnel projects in the United States, it should be noted that these standards are probably inadequate in addressing the SR-710 tunnel unique safety challenges. Five-mile-long passenger tunnels without intermediate exits and entries have never been built in this country. The SR-710 tunnel design fails to consider the design of modern international passenger tunnels of similar length that have applied lessons learned from tunnel disasters.

Many of the safety, egress and access issues associated with the single-bore tunnel design also apply to the dual-bore tunnel design. These issues are thoroughly described in a Finding of Inadequacy for Tunnel Safety in Section 3.24 of this report. They will not be repeated here. It should be noted, however, that the Draft EIR/EIS states that elimination of the cross-passages for the dual-bore design is being considered. In the SR-710 Tunnel Evaluation Report, Appendix A, Technical Memorandum 1, Bored Tunnel Geometry, Sec. 4.2, p. 6, it says

“In future phases of this project, ***if the cross passages are carried forward***, coordination will be needed to determine how the cross passages will work together with the emergency egress passageways when they are in use.” (bold emphasis added)

If cross passages are eliminated for the dual-bore tunnel option, this would result in a very significant change to safety and emergency response impacts than what is currently presented in the report.