

WPRA SR710 Draft EIR/EIS Response Finding and Appendices List

Section			
1	INTRODUCTION:		
		Executive Summary	
		Key Contributors	
		Historical Overview of the 710 Project	
2	PROJECT DEFINITION, PROCESS AND ALTERNATIVES	Appendices	
2.1	PROJECT DEFINITION - PROJECT NEED, PURPOSE AND STUDY AREA		
	1	<p>The Draft EIR/EIS improperly segments the SR-710 and I-710 Projects; this has resulted in misleading and inconsistent project definition and an inadequate alternatives analysis.</p> <p>a) The I-710 and SR-710 Projects have been inappropriately and illegally segmented. They are in fact a single, linked project; as separate projects each has greatly weakened utility.</p> <p>b) Segmenting the two projects allows the SR-710 Project Need and Purpose statements to avoid addressing the effects of creating a new goods movement corridor in the SR-710 Study Area. Consequently</p> <p>b1) The Draft EIR/EIS uses an inaccurate and unstable (changing) project definition.</p> <p>b2) The Draft EIR/EIS omits critically important alternatives related to increases in port and other traffic.</p> <p>b3) The Draft EIR/EIS fails to adequately assess environmental impacts related to port traffic and port growth.</p> <p>b4) The Draft EIR/EIS grossly misrepresents the project, its alternatives and impacts, crippling reasonable participation by decision-makers, stakeholders and the public.</p> <p>c) Segmentation results in a failure to assess alternatives equally across project boundaries; this unequal treatment results in a biased and inaccurate cumulative impact assessments for both 710 projects.</p>	<p>2.1: Finding 1, Attachment A: No 710 Action Committee Letter to Mr. Kosinski, dated September 26, 2012.</p> <p>2.1: Finding 1, Attachment B: 'I-710 Corridor RDEIR/SDEIS Summary of the Technical Memorandum for Model Input Data and Key Assumptions for Person Travel'. Metro.</p>
	2	The Draft EIR/EIS SR-710 Project Need statement was changed without explanation – creating an unstable project definition and uncertainty regarding the validity of the <u>Alternative Analysis process</u> .	
	3	The Project Need is based on flawed assumptions and is not justified.	

		<p>a) The Project Need is defined in terms of a necessity to fill a ‘Gap’ in LA’s freeway system; a 60 year old plan that does not respond to current transportation system conditions.</p> <p>b) The Project Need’s focus on a north-south transportation problem is misplaced; the true need is to improve the efficiency of the regional transportation system network, which is ignored.</p> <p>c) Neither historical nor predicted Vehicles Miles Traveled (VMT) trends support the Project Need.</p> <p>d) It was not demonstrated that models predicting future VMT adequately consider current game-changing technologies that are rapidly changing travel behavior and will further reduce VMT and the need for a freeway tunnel.</p> <p>e) Growth data are misrepresented and grossly overstated.</p> <p>f) The claim that “the high volume of cut-through traffic in the Study Area plays a major role in contributing to arterial congestion” is not supported.</p> <p>g) Project Need has been artificially generated by misleading freeway signage, which creates north/south cut-through traffic in the Study Area.</p>	
	4	The SR-710 Study Area is too narrowly defined; as a result, important alternatives have not been considered that address the Project Purpose and Need, and affected communities have not been involved in the EIR process.	
2.2		THE EIR PROCESS	
	1	<p>The Draft EIR/EIS fails to identify a Preferred Alternative, yet the entire EIR/EIS process has been conducted in a manor to justify a decision already made – the construction of a freeway tunnel(s).</p> <p>a) The project name and definition promote a freeway tunnel.</p> <p>b) The Study Area boundaries are carefully defined to favor a freeway tunnel.</p> <p>c) The Draft EIR/EIS does not consider a reasonable range of alternatives that realistically compete with the freeway-tunnel in meeting project objectives.</p> <p>d) The Draft EIR/EIS has ‘bundled’ alternative options in a manner that favors the freeway-tunnel alternative.</p> <p>e) The treatment of the SR-710 alternatives in the I-710 Re-circulated Draft EIR (DEIR) / Supplemental Draft EIS (DEIS) demonstrates that Metro expects that the freeway-tunnel will be built.</p> <p>f) The Metro organization and key Metro board members are vocal and active public advocates for the freeway-tunnel.</p>	<p>2.2: Finding 1, Attachment A: SR-710 North Study Fact versus Fiction, Metro website.</p> <p>2.2: Finding 1, Attachment B: ‘Mobility’, Los Angeles Times Advertisement, published by Civic Publications, Inc.</p> <p>2.2: Finding 1, Attachment C: Email conversation with citizen Sylvia Plummer and Chris Lancaster owner of Civic Publications.</p> <p>2.2: Finding 2, Attachment D: Metro/Caltrans SR-710 Cooperative Agreement, June 12, 2014</p>

	<p>g) The SR-710 cost benefit analysis was performed in a manor that favors the freeway tunnel.</p> <p>h) The Draft EIR/EIS technical analyses were performed in a manor that favors the freeway tunnel.</p>	
2	Metro inappropriately initiated the SR-710 Study Draft EIR/EIS process without approval by the Lead Agency (Caltrans), and there's little evidence that Caltrans has taken responsibility for the scope and content of the environmental assessment.	
3	<p>The ability of the public and stakeholders to meaningfully participate in the Draft EIR/EIS process is greatly inhibited by the length, complexity and inadequacy of the document.</p> <p>a) The Draft EIR/EIS document size is unreasonable.</p> <p>b) Large cumulative impacts significantly add to review complexity.</p> <p>c) The SR-710 Study includes numerous alternatives, design variations and options; the assessment of environmental impacts for each scenario are not easily discernable.</p> <p>d) The Draft EIR/EIS is confusing and incomplete.</p>	
4	It is unclear if the 'SR-710 Project Study' Draft EIR/EIS is actually a Draft EIR/EIS for a 'project' or a 'study'.	
5	The Draft EIR/EIS does not clearly describe how the document responds collectively to NEPA and CEQA.	
2.3	ANALYSIS AND DEFINITION OF ALTERNATIVES	
1	The SR-710 Study Analysis of Alternatives and subsequent Draft EIR/EIS failed to adequately consider reasonable and competitive multi-mode alternatives	2.3: Finding 1, Attachment A: The Pasadena Preferred Alternative (Letter + Document of Recommendations) 2.3: Finding 1, Attachment B: Beyond the 710's 'New Initiative for Mobility and Community', Nelson
2	<p>The SR-710 Study Analysis of Alternatives and the subsequent Draft EIR/EIS failed to consider several reasonable and competitive single-mode alternative options.</p> <p>a) Options that address the efficiency of the broader transportation system network, not just north-south corridors.</p> <p>b) Options that address the primary source of the SR-710 Study transportation demands - the Glendale region.</p> <p>c) Options that provide meaningful scale and connectivity with areas south of the Study Area.</p> <p>d) Options that consider multiple bus enhancement corridors in a single alternative.</p> <p>e) Options that address significant transportation problems and safety hazards in the Pasadena '210' stub area and at the termination of the I-710 freeway in El Sereno.</p>	2.3: Finding 2, Attachment A: The Connecting Pasadena Project

	3	The definition of the tunnel alternative options is unclear, inconsistently presented and sometimes unexplained, making it difficult for the public to fairly assess the environmental impacts.	
	4	The “No Truck” tunnel option presented is not credible.	
	5	The description of the one-tunnel option is inaccurate and intentionally misleading to the public, stakeholders and decision-makers.	
	6	The tunnel alternative single-bore option is not adequate or reasonable because it exceeds margins of safety and passes unacceptable fire and accident risks onto tunnel users.	
2.4		THE ALTERNATIVE ENVIRONMENTAL IMPACT ASSESSMENT	
	1	The Draft EIR/EIS lacks sufficient information to substantiate many claims and defers decisions and analyses required for a credible environmental impact assessment.	
	2	The Draft EIR/EIS does not establish criteria for when an environmental impact would be “significant” for purposes of environmental review and mitigation.	
	3	Missing information, deferred designs and analyses, and failure to establish criteria for significant impacts has resulted in a very immature formulation of mitigation measures for this phase of the EIR process.	
	4	The Draft EIR/EIS fails to adequately address the Project Need for safety, and safety appears to have been compromised in order to achieve the desired performance and cost objectives.	
3		TECHNICAL ASSESSMENT	
3.1		LAND USE	
	1	The Draft EIR/EIS fails to provide acceptable mitigations for many Land Use related environmental impacts.	
	2	Mitigation Measure LU- 1 (General Plans and related local plans) is inadequate under NEPA and CEQA as to all four Build Alternatives.	
	3	Mitigation Measure LU-2 (State, Regional and related local transportation-related plans) is inadequate under NEPA and CEQA as to all four Build Alternatives.	
	4	The Draft EIR/EIS is inadequate in that the proposed series of six, large, ventilation towers or “stacks” for the northern portal (and, in the alternative, any other location or number of such ventilation towers for the northern portal) 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.	

	5	The Draft EIR/EIS is inadequate in that the proposed series of six, large, ventilation towers or “stacks” for the northern portal (and, in the alternative, any other location or number of such ventilation towers for the northern portal) will have substantial adverse impacts on Cultural Resources, namely the Old Pasadena National Register Historic District	
3.2		GROWTH	
	1	Growth data are misrepresented and grossly overstated. a) The Draft EIR/EIS uses a ‘growth rate’ definition that is inconsistent with accepted standards and gives the impression that growth numbers are much larger than they actually are. b) The Draft EIR/EIS quotes historic growth rates that are not relevant to the SR710 Study Area, exaggerating the perceived need for the project. c) The Draft EIR/EIS uses the anomalous 2008 recession year as a base year; thus, population growth numbers are greatly overstated. d) The Draft EIR/EIS fails to acknowledge declining population growth rate trends.	
	2	The Draft EIR/EIS fails to properly assess growth-induced environmental impacts related to expanded freeway capacity, changing traffic patterns and the creation of a new goods movement corridor.	
3.3		Community Impact	
3.3.1		Community Character and Cohesion	
	1	The Draft EIR/EIS fails to acknowledge the City of Pasadena as a ‘site of cultural significance’; consequently, it does not comply with NEPA and Executive Order 11593 - Protection and enhancement of the cultural environment, or properly assess the environmental impacts for the tunnel alternative. <i>Note: Please see the Finding of Inadequacy of the same title in Section 3.7. Cultural Resources</i>	
3.3.2		Relocations and Real Property Acquisitions	
		Not reviewed	
3.3.3		Economic Impacts	
	1	The economic impact analysis dismisses indirect affects of the build alternatives and presents misleading results.	
	2	The economic impact analysis fails to recognize unique economic environmental impacts for the tunnel alternative.	
	3	The criteria for a ‘significant impact’ related to business and job disruptions during construction periods is not disclosed, and claims of ‘no significant impact’ are not warranted for the cities of Pasadena and Monterey Park.	

	4	The economic impact analysis trivializes the economic consequences of business relocations in environmental-justice-sensitive unincorporated areas by using inappropriate screening criteria.	
	5	The economic impact analysis improperly uses the cost of the Project Alternatives as the only determining factor for employment calculations; consequently the report is biased to favor the most expensive alternative – the freeway tunnel.	
	6	The RIMS II methodology and multiples used to estimate job creation for the build alternatives are not fully explained, or disclosed in a manner that can be validated for accuracy.	
	7	Demographic Projections for the Study Area were based on only one data source, and growth claims are misrepresented and grossly overstated	
	8	The inappropriate Study Area western boundary has resulted in an inadequate economic analyses; Pasadena, Glendale and Burbank are economically linked in a ‘Tri-city market.	
3.3.4	Environmental Justice		
	1	The SR-710 Study Project EIR/EIS process has failed to properly identify issues, environmental impacts, or impact mitigations related to Disadvantaged Communities in the Study Area, and has both failed to inform and misinformed these communities in a manner that perpetuates environmental injustice.	<p>3.3.4: Finding 1, Attachment A: ‘Environmental Justice Comments for the SR-710 Draft Environmental Impact Report (EIR) / Environmental Impact Statement (EIS)’. from Roger Kintz to the WPRA. August 2, 2015.</p> <p>3.3.4: Finding 1</p> <p>Attachment A1: CES 2.0 Map of Study Area with Tunnel Alternative Alignment</p> <p>Attachment A2: CES PM2.5 Map of Study Area with Tunnel Alignment</p> <p>Attachment A3: CES Groundwater Map of Study Area with Tunnel Alignment</p> <p>Attachment A4: CES PM2.5 Map of El Sereno</p> <p>Attachment A5: CES Groundwater Map of El Sereno</p> <p>Attachment A6: CES Population Characteristics of El Sereno</p> <p>Attachment A7: CES PM2.5 Map of Northwest Pasadena</p> <p>Attachment A8: CES Groundwater Map of Northwest Pasadena</p> <p>Attachment A9: CES Population Characteristics of Northwest Pasadena</p>

	2	The WPRC adopts and incorporates the EJ-related findings submitted by the Coalition For a Safe Environment (CFASE).	3.3.4: Finding 2, Attachment B: SR-710 Draft EIR/EIS Comments, from Coalition For a Safe Environment, July 6, 2015
3.4		UTILITIES / EMERGENCY SERVICES	
	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).	
	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).	
	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.	
	4	N/A	
	5	The DEIR/DEIS does not specify the capacities of solid waste disposal facilities; thus potential environmental impacts cannot be assessed.	
	5 (number inadvertently repeated)	The Draft EIR/EIS Fails to Analyze the Huntington Memorial Hospital Master Development Plan Amendment.	
	6	The Draft EIR/EIS Fails to Adequately Analyze Impacts on Emergency Services Near the Tunnel Portals.	
	7	For the tunnel alternative, the Draft EIR/EIS Fails to incorporate reasonable options for first responder safety and tunnel access/egress.	
3.5		TRAFFIC AND TRANSPORTATION IMPACTS	
	1	The Draft EIR/EIS is inadequate because the underlying traffic model is flawed and deficient.	
	2	The Draft EIR/EIS fails to analyze whether the project is consistent with important regional and state transportation planning strategies.	
	3	The Draft EIR/EIS fails to reconcile future traffic assumptions with actual regional traffic trends	3.5: Finding 3, Exhibit A: ‘Ian Lockwood’s Response to the Draft EIR/EIS’, Toole Design Group, July 2015.
	4	The Draft EIR/EIS fails to consider important new local and state transportation performance measures.	
	5	The Draft EIR/EIS erroneously concludes that the build alternatives would be consistent with Pasadena’s General Plan.	
	6	The Draft EIR/EIS fails to analyze intersections and freeway segments in close proximity to the build alternatives.	

	7	The Draft EIR/EIS erroneously minimizes the impacts of the build alternatives on new traffic trips.	
	8	The Draft EIR/EIS erroneously minimizes the shift of trips to new facilities and the decrease in congestion reduction benefits over time.	
	9	The Draft EIR/EIS fails to adequately analyze the permanent parking impacts in BRT and LRT station areas.	
	10	The Draft EIR/EIS fails to analyze LRT alternatives.	
	11	The Draft EIR/EIS fails to properly describe and analyze TSM/TDM alternative improvements for the tunnel alternatives and erroneously claims that traffic impacts would be reduced in residential areas.	
	12	The Transportation Analysis is inadequate in many other ways.	
		a) The Draft EIR/EIS Transportation Cumulative Impacts Assessment is grossly inadequate.	
		b) The Draft EIR/EIS improperly assumes that the freeway tunnel alternative would improve mobility on local streets.	
		c) The Draft EIR/EIS does not adequately consider tolling alternatives and the potential impacts of toll diversion.	
		d) The Draft EIR/EIS does not analyze reasonable tunnel alternative options.	
		e) The Draft EIR/EIS does not adequately analyze ramp metering.	
		f) The Draft EIR/EIS TSM/TDM options for the non-tunnel alternatives fail to address significant transportation problems and safety hazards in the Pasadena 210 Freeway stub area and at the termination of the I-710 Freeway in El Sereno.	
		g) The Draft EIR/EIS fails to adequately explain and justify modifications made to the heavy duty truck (HDT) model.	
		h) The Draft EIR/EIS fails to adequately analyze impacts on emergency services near the tunnel portals.	
		i) The Draft EIR/EIS fails to adequately analyze cut-through traffic in the Fremont corridor.	
		j) The Draft EIR/EIS does not analyze Tunnel Alternative impacts on Rose Bowl traffic.	
		k) The Transportation Technical Report fails to demonstrate that the new SCAG transportation model was adequately validated	
3.6		VISUAL / AESTHETICS	
	1	The description of the local visual environmental settings is inadequate for assessing visual quality impacts.	
	2	The Draft EIR/EIS fails to provide a summary map of the Tunnel Alternative north portal physical characteristics.	

	3	The Visual Impact Analysis fails to adequately consider Pasadena’s rare and unique visual attributes, and underestimates the Tunnel Alternative environmental impacts.	
	4	The selection criteria for Key Views is inadequately described, and the Key Views selection process was unsuccessful in identifying important impacted views in Pasadena.	
	5	The mapping for Key Views is confusing and didn’t adhere to mapping conventions.	
	6	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.	
	7	The DRAFT EIR/EIS improperly minimizes the visual impacts of the proposed Tunnel Alternative sound walls.	
	8	The Draft EIR/EIS trivializes the visual impacts during tunnel construction and improperly defers mitigations.	
	9	The VIA fails to address either short or long-term visual impacts associated with the reasonable possibility of having to fix a failed Tunnel Boring Machine (TBM) from above ground.	
3.7		CULTURAL RESOURCES	
	1	The WPRA adopts and incorporates the comment submitted by both Pasadena Heritage and the National Trust for Historic preservation (Attachments A & B).	3.6: Finding 1, Attachment A1: ‘Draft Findings of No Adverse Effect for SR 710 North Study, May 2015’, Pasadena Heritage, July 2, 2015. 3.6: Finding 1, Attachment A1: Pasadena Heritage Response to the SR-710 Draft EIR/EIS 3.6: Finding 1, Attachment B: National Trust for Historic Preservation Response to the SR-710 Draft EIR/EIS
	2	The Draft EIR/EIS fails to acknowledge the City of Pasadena as a ‘site of cultural significance’; consequently, it does not comply with NEPA and Executive Order 11593 - Protection and enhancement of the cultural environment, or properly assess the environmental impacts for the tunnel alternative.	
	3	The Draft EIR/EIS has woefully failed to sufficiently address Pasadena’s cultural assets.	
3.8		HYDROLOGY AND FLOOD PLANE	
	1	The Hydrology and Floodplain Analysis in Section 3.8 is misleading and demonstrates a bias toward the Freeway Tunnel Alternative in violation of NEPA (40CFR§1502.1).	
	2	The DEIR/DEIS does not provide sufficient information to conclude that adequate downstream drainage system capacity exists to accommodate the proposed build alternatives. Therefore, a “no impact or Less than Significant Impact” finding is not justified. CEOA (§15126.2, §15126.4).	
3.9		WATER QUALITY AND STORM WATER RUNOFF	

	1	The DEIR/DEIS does not adequately evaluate potential water quality impacts that may be created by the project from groundwater dewatering, groundwater pumping and storm water runoff, CEQA (§15020, §15126.2, §15126.4).	
3.10		GEOLOGY / SOILS / SEISMIC / TOPOGRAPHY	
	1	It was not demonstrated that the cited seismic/geology design, build and operational standards for the Tunnel Alternative are appropriate.	
	2	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.	
	3	For the LRT and Freeway Tunnel Alternatives, key geological/seismic designs, investigations and analyses have been inappropriately deferred until after the Final EIR/EIS.	
	4	Seismic design criteria have not been established.	
	5	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 Final EIR/EIS.	
	6	There is no evidence that geological/seismic lessons learned from historic tunnel seismic events were adequately considered or incorporated into tunnel designs.	
3.11		PALEONTOLOGY	
		Not reviewed	
3.12		HAZARDOUS WASTE / MATERIALS	
		Not reviewed	
3.13		AIR QUALITY	
	1	The Draft EIR/EIS used outdated guidance for the calculation of cancer risks.	
	2	Current levels of particulate matter less than 2.5 microns in size have not been identified for the portals.	
	3	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.	
	4	Quantitative Hot-Spot Analyses have been improperly deferred.	
	5	The quantitative MSAT Analysis improperly takes credit for air quality improvements outside the scope of the project, mischaracterizing the negative health impacts of the freeway tunnel alternative to the public, stakeholders and decision-makers.	
	6	By failing to properly present the cancer risk <i>attributable to the project</i> , the Draft EIR/EIS fails to discuss important negative health impacts to residents near the roadway (both below the South Portal and above the North Portal)	

	7	MSAT analysis for the tunnel alternative indicates that increases in cancer risk far exceeds both the South Coast AQMD and EPA standards.	
	8	The Draft EIR/EIS Selected the wrong year for the Health Risk Assessment	
	9	Important information regarding the tunnel air pollution control system is not provided; consequently, the adequacy of the design cannot be validated.	
	10	The dispersion model for the tunnel exhaust tower(s) cannot be validated due to a lack of information on the facility.	3.13: Finding 10 & 11, Attachment 1/Figure A (both references used, mislabeled): Sensitive Receptors for the Tunnel North Portal
	11	The dispersion models near the portals do not consider unfiltered air escaping from the tunnel exit with the traffic.	
	12	Dispersion model parameters were inadequately described and a sensitivity analysis was not performed.	
	13	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.	
	14	The dispersion model does not appear to adequately cover the reduced dilution that occurs at night.	
	15	The Draft EIR/EIS fails to acknowledge the uncertainty of estimated emission rates and modeling results, and the values shown imply precision that does not exist.	
	16	Dispersion model inputs for emission rates are unwieldy and impossible to evaluate as presented.	
	17	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.	
	18	The Draft EIR/EIS failed to include a Health Impact Assessment.	
3.14	NOISE AND VIBRATION		
	1	The Noise section of the CEQA Evaluation (Section 4.2.12 of the DEIR/DEIS) fails to identify the significant noise impact from the operation of the LRT maintenance yard.	
	2	The CEQA Noise Evaluation of Long-Term Stationary Noise Impacts (Page 4-70 to 4-71 of Section 4.2.12 of the DEIR/DEIS) does not provide noise criteria for the measurements, standards, or estimates included in the analysis	
	3	The CEQA Noise Evaluation (Section 4.2.12 of the DEIR/DEIS) fails to address noise from LRT Alternative and Freeway Tunnel Alternative ventilation systems.	
	4	The DEIR/DEIS fails to substantiate purported noise reductions.	
	5	The DEIR/DEIS fails to recognize Ambassador Auditorium as a sensitive receptor, or assess construction and long-term noise and vibration impacts against the appropriate requirements for a concert hall.	
	6	The DEIR/DEIS fails to address either short or long-term noise impacts associated with the reasonable possibility of having to fix a failed Tunnel Boring Machine (TBM).	

	7	The DEIR/DEIS does not analyze noise from the TBM during the construction of the LRT or freeway Tunnel Alternative, or from other special equipment required to build a 60' diameter tunnel.	
	8	The DEIR/DEIS does not adequately analyze or assess the impacts resulting from TBM vibrations for either the LRT or the Freeway Alternative.	
	9	The DEIR/DEIS does not analyze the vibrational impacts of potential blasting used for excavating the LRT and Freeway Tunnel alternatives.	
	10	Continuous tunnel-boring operations would conflict with local noise regulations and result in a significant noise impact.	
	11	The noise model for the tunnel alternative north portal may be invalid; there is evidence that at least some model parameters incorrectly assumed that the tunnel(s) exit is approximately 1500 feet south of the proposed location.	
	12	The noise model did not use conservative estimates for modeling tunnel effects near the tunnel openings; consequently environmental impacts are underestimated, including for the Maranatha School and Ambassador Auditorium.	
	13	The noise environmental impact for Receptor FR-71 is incorrect.	
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).	
	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.	
	3	For the Freeway Tunnel alternative, the facility design of the two proposed electricity substations has been deferred; thus environmental impacts cannot be assessed.	
	4	The Energy Impact Analysis is confusing and presents information that is not intuitive with minimal or incomplete explanation.	
3.16 TO 3.21 AND NES		NATURAL COMMUNITIES , WETLANDS AND OTHER WATERS, PLANT SPECIES, ANIMAL SPECIES, THREATENED AND ENDANGERED SPECIES, INVASIVE SPECIES IMPACT ANALYSIS	
	1	The Draft EIR/EIS does not use current sources for the identification of special status species.	
	2	The Draft EIR/EIS uses results from field surveys that have not been conducted at the appropriate time of year to determine the presence and status of applicable species.	
	3	The Draft EIR/EIS incorrectly reports the results of animal species surveys.	
	4	The Draft EIR/EIS makes erroneous statements of fact about wildlife corridors.	
	5	The Draft EIR/EIS makes invalid assumptions about rare plant persistence in disturbed environments.	

	6	The Draft EIR/EIS makes assertions about the habitat value of wetlands that are inconsistent and that conflict with NES survey data.	
3.22		RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF THE HUMAN ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY	
		Not reviewed	
3.23		IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES THAT WOULD BE INVOLVED IN THE PROPOSED PROJECT	
		Not reviewed	
3.24		CONSTRUCTION AND TUNNEL DESIGN	
	1	The Draft EIR/EIS has failed to demonstrate an understanding of SR-710 tunnel boring technical risks, and a plan to reduce risks was not presented.	
	2	The Draft EIR/EIS fails to address the reasonable probability of a Tunnel Boring Machine (TBM) breakdown(s) and the resulting environmental impacts should a TBM require repairs from above ground, or if land settles above the tunnels. a) The Draft EIR/EIS does not address the probability of severe and foreseeable TBM breakdowns. b) The Draft EIR/EIS does not present recovery scenarios when a TBM needs repairing underground or through an excavated access pit within a residential or commercial area. c) The Draft EIR/EIS does not address the environmental impact resulting from the execution of TBM recovery plans above or below ground.	
	3	The Draft EIR/EIS does not address potential tunnel failures both during and after construction.	
	4	The Tunnel Alternative is based on a success-oriented plan that is unlikely to be realizable and which misinforms the public of project risk. a) The Draft EIR/EIS assumes that the SR-71 tunnels can be constructed using 60 foot TBMs without having performed a meaning technical feasibility assessment. b) The SR-710 Study Project assumes that the Tunnel Alternative can be built for approximately 1\$B/mile despite overwhelming evidence that the tunnel costs will be higher. c) The Draft EIR/EIS presumes that excavation of the SR-710 tunnels will progress without unexpected mishaps and setbacks. d) The Draft EIR/EIS carries “bare conclusions” which imply that tunneling under Pasadena, South Pasadena and Los Angeles will not cause significant negative effects.	

		<p>e) The Draft EIR/EIS ignores of potential environmental impacts related to the displacement of people from homes and businesses inside a TBM rescue construction zone.</p> <p>f) The Draft EIR/EIS did not consider the a potential above ground TBM rescue to be either a temporary or permanent impact.</p>	
Note: This finding was submitted as an addendum	5	The proposed SR-710 tunnel designs fail to incorporated a reasonable array of fundamental safety options for mitigating vehicle accidents and fires, and lack multiple alternatives for egress and first responder tunnel access. Consequently significant risk is passed on to the tunnel users.	
Note: This finding was submitted as an addendum	6	<p>For the tunnel alternative, the Draft EIR/EIS fails to identify a feasibility plan, environmental impacts, or costs associated with transporting Tunnel Boring Machines (TBM) to the construction sites.</p> <p>a) The Draft EIR/EIS fails to acknowledge the extensive challenges of transporting TBMs and other large, heavy objects in urban areas.</p> <p>b) The Draft EIR/EIS fails to provide a feasibility plan for transporting the TBMs from the ports to the portal construction sites.</p> <p>c) The Draft EIR/EIS fails to identify environmental impacts related to TBM transport, even though historic precedence for the movement of large and heavy objects in Los Angeles demonstrates that impacts could be very significant.</p> <p>d) There is no evidence that tunnel cost estimates include the cost of TBM transport, even though estimates are likely to run into the tens of millions of dollars.</p>	
Note: This finding was submitted as an addendum	7	It was not demonstrated that cited design, build and operational standards are appropriate Tunnel Alternative.	
3.25		CUMULATIVE IMPACTS	
	1	The draft EIR/EIS Transportation Cumulative Impacts Assessment is grossly inadequate.	
	2	The Draft EIR/EIS improperly segments the SR 710 North Project and the I-710 South Corridor Project.	

3	The Draft EIR/EIS improperly bifurcates I-5 improvement projects.	
4	The Draft EIR/EIS improperly considers three contiguous I-5 improvement projects as separate projects.	
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	
6	The Draft EIR/EIS fails to analyze the relationship of the SR 710 tolled tunnel alternatives and the I-10 HOT Lanes	
7	The Draft EIR/EIS improperly dismisses the possible impacts of the I-110 Widening and Rehabilitation Project	
8	The Draft EIR/EIS fails to analyze current Metro LRT improvements in light of the Proposed LRT build alternative.	
9	The Draft EIR/EIS improperly minimizes impacts from the 16 East California Project.	
10	The Draft EIR/EIS fails to analyze the Huntington Memorial Hospital Master Development Plan Amendment.	
11	The Draft EIR/EIS fails to analyze the Devil's Gate Reservoir Project.	
12	The Draft EIR/EIS inaccurately limits the cumulative Land Use impacts to land taken for construction and operation.	
13	The Draft EIR/EIS improperly Concludes that neither the build alternatives nor the cumulative projects are growth inducing.	