

**Date:** March 17, 2017

**To:** The Los Angeles County Metropolitan Transportation Authority Board  
The California State Assembly Transportation Subcommittee  
The Honorable Chris Holden

**Subject:** The West Pasadena Residents' Association Supports the Approval of the SR-710 North Study Bill, AB 287, with Modifications

The West Pasadena Residents' Association (WPRA) is an all-volunteer organization dedicated to maintaining and enhancing the quality of life in southwest Pasadena. We represent 7,000 households, including 1,000 paid members who live near the proposed SR-710 tunnel north portal in Old Pasadena.

Due to the enormous cost of the SR-710 tunnel alternative, the inadequacy of both the tunnel proposal and the environmental impact assessment, and the large environmental impact to residents that have suffered from the threat of a freeway destroying their communities for more than a half century, *we recommend that you support AB 287, so that the SR-710 North Study Tunnel Alternative can be permanently removed from consideration.* Instead of a tunnel, we urge support for a multi-modal solution that will serve all communities, promote economic vitality, and reduce greenhouse gas emissions as required by SB743 and the Governor's April 2015 Executive Order. Both the City of Pasadena and the Beyond the 710 project have developed SR-710 multi-modal alternatives that should be considered in any SR-710 study. These plans have broad general support from local communities including Pasadena, South Pasadena, Glendale, La Canada and Sierra Madre.

While we support AB 287, we are concerned with some of the language and request that the wording of the draft bill be changed to address the following concerns:

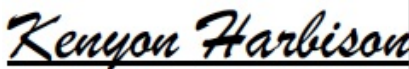
- First and foremost, the bill appears to allow for the re-introduction of a surface freeway route, which is not acceptable. We have confirmed with Assemblymember Holden's office that this was not the draft bill's intention, and we recommend that specific wording be added to disallow this alternative.
- We also recommend finding alternate wording for the 'I-710 Gap Corridor'. This terminology inadvertently legitimizes a 60-year-old plan that does not respond to current transportation conditions. It implies that a gap exists which must be filled, and it further suggests either a freeway or toll way connecting point 'A' to point 'B'. Furthermore, the wording suggests that the SR-710 North Study and the I-710 Corridor Study (that extends along the I-

710 from Long Beach to Los Angeles) are in fact the same project. This is confusing and it suggests that there was improper segmentation during the environmental impact process. We believe that the name of the project that this bill is intended to address is the SR-710 North Study. Therefore, the proposed Advisory Committee's focus should be on improving the efficiency of the regional transportation network in the SR-710 Study Area, not on filling a purported gap.

- It is stated that the proposed Advisory Committee "will make recommendations...on the most appropriate and feasible alternative...to improve... activities related to goods movement". The SR-710 Draft Environmental Impact Report did not include goods movement as a primary project purpose and need. Adding this wording at this time causes confusion and contributes to an already unstable project definition that has plagued the SR-710 environmental impact process from the start. This language may invalidate many of the analyses performed and impact assessments described in the SR-710 Draft Environmental Impact Report. Furthermore, the new wording implies that the Advisory Committee will consider goods movement from the ports. Again, this might lead one to conclude that the SR-710 and I-710 Corridor projects were improperly segmented during the environmental impact process.
- The bill states that the tunnel alternative costs are '\$2 billion to \$3 billion.' These numbers do not reflect the estimates provided by Metro (~\$3.2B for a single-bore tunnel and ~\$5.6B for a dual-bore tunnel). Moreover, we have concluded that Metro's numbers are grossly underestimated and do not reflect costs estimates for analogous projects. Metro has failed to respond to the numerous documented concerns regarding the validity of its estimates.
- We believe that the cities of La Canada Flintridge and Glendale should be represented on the proposed Advisory Committee. These cities are heavily impacted by the project. Officials and residents of these cities have been consistently active throughout the SR-710 project environmental impact process and should not be excluded moving forward.

In summary, we urge you to support the passage of AB 287, after acceptable modifications are made to address the concerns stated above. We ask that you take the actions necessarily to move the SR-710 project toward a more progressive transportation future -- a multi-modal solution that is environmentally and financially responsible, and that has the support of the people it is intended to serve.

Thank you for considering our point of view.



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WPRA President



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