

Memorandum

To: CHAIR AND COMMISSIONERS
CALIFORNIA TRANSPORTATION COMMISSION

CTC Meeting: December 11-12, 2013

Reference No.: 4.9
Information Item

From: STEVEN KECK
Acting Chief Financial Officer

Subject: UPDATE ON STATE ROUTE 710 NORTH STUDY

The attached package includes a brief fact sheet and informational pamphlet on the State Route 710 North Study (Study). The California Department of Transportation and Los Angeles Metropolitan County Transportation Authority (Metro) will be presenting a status of the Study at the December 2013 Commission meeting.

Attachments

STATE ROUTE 710 NORTH STUDY FACT SHEET

SUBJECT: State Route 710 North

The existing No Build condition of State Route 710 North contributes to growing congestion on freeways and local arterials, and poor transit operations; and cannot accommodate regional and local north-south travel demands within the study area.

BACKGROUND: The 710 transportation corridor was originally envisioned to extend from the City of Long Beach, north to the 210/710/134 interchange in the City of Pasadena. A 4.5 mile segment between Interstate 10 and the 210/710/134 interchange is the only uncompleted portion of the facility. For decades, planning efforts to improve mobility and relieve congestion on local arterials and nearby freeways, resulting in part from the uncompleted portion of the 710 corridor, were only focused extending the freeway (a surface alignment).

In 2008, two-thirds of Los Angeles County voters approved use of Measure R local funds to address the problem. In 2011, LA Metro, in partnership with Caltrans, commissioned an environmental study to determine the full range of multi-modal transportation options to improve mobility while addressing community concerns through a robust community outreach and public participation program for a study area bordered by Routes 2, 5, 10, 210 and 605 in the western San Gabriel Valley and east/northeast section of Los Angeles County.

ALTERNATIVES UNDER STUDY:

1. No Build
2. Transportation System Management/Transportation Demand Management
3. Bus Rapid Transit
4. Light Rail Transit
5. Freeway Tunnel

STUDY SCHEDULE:

MAJOR MILESTONE	TARGET DATES
Alternatives Analysis (AA)	Completed December 2012
Complete and Release Draft EIR/EIS	Spring 2014
Conduct Public Hearings	Spring 2014
Complete Final EIR/EIS and Select Preferred Alternative	Summer 2015
Record of Decision	Summer 2015

PROJECT FUNDING:

Major Build Alternatives Estimate Range: \$2.6 – \$5.4B

Secured Funds: Measure R - \$780M

Potential P3 Opportunity

CONTRACT DELIVERY METHOD: Undefined

State Route 710 North Environmental Study

ENVIRONMENTAL DOCUMENTATION PHASE

With your participation in the SR 710 North Study, Metro and Caltrans will begin to shape the future of transportation and mobility in your community.

Con su participación en el Estudio de la Ruta Estatal 710 Norte, Metro y Caltrans empiezan a cambiar el futuro del transporte y la movilidad en su comunidad.

SR710研究有了您的參與，地鐵和Caltrans將開始在你的社區塑造未來的運輸和流動性。

How do *We Connect?* ¿Cómo *Nos Conectamos?* 我們如何 推廣?

How your feedback is incorporated into the SR 710 North Study Process:

Como sus comentarios son incorporados al proceso de Estudio de la SR 710 Norte:

您的反饋納入SR710北段研究的過程：



Web

互聯網

www.metro.net/sr710study



E-Mail

電子郵件

sr710study@metro.net



Correspondence

Correo

信件

SR-710 Study
One Gateway Plaza
Los Angeles, CA 90012



Facebook

www.facebook.com/SR710Study



Twitter

[@sr710study](https://twitter.com/sr710study)



Telephone

Teléfono

電話

855-4SR-7100



E-Tool

Portal Interactivo

互動網站

www.sr710etool.com

Once delivered to the Study Team, feedback is...

Una vez entregado al Equipo de Estudio, sus comentarios son...

一旦交付給研究小組，技術專家將會...

- Evaluated by technical experts
Evaluados por expertos técnicos
評估您的反饋
- Reflected in the alternatives, based on set criteria consistent with the study objectives
Reflejados en las alternativas, basado a los criterios establecidos con los objetivos del estudio
並且在與各研究目標的標準相一致的基礎上體現於各個替代方案中

...examined
and considered

...examinados
y considerados

...研究和考慮

What is the SR 710 North Study?

¿Qué es el Estudio de la Ruta Estatal 710 Norte?

710公路北段研究是什麼？

The State Route 710 North (SR 710) Study evaluates transportation options to improve mobility and relieve congestion in the area between State Route 2, Interstates 5, 10, 210, and 605 in East/Northeast Los Angeles and the San Gabriel Valley. The Study considers five multimodal Alternatives. The Alternatives are 1.) No-Build, 2.) Transportation System Management/Transportation Demand Management (TSM/TDM), 3.) BRT, 4.) LRT, and 5.) a Freeway Tunnel.

El Estudio de la Ruta Estatal 710 Norte (SR 710) evalúa las opciones de transporte para mejorar la movilidad y aliviar la congestión en el área entre la Ruta Estatal 2 y las autopistas 5, 10, 210 y 605 en el Este/Noreste de Los Ángeles y el Valle de San Gabriel. El estudio considera cinco Alternativas multimodales Las Alternativas son 1.) No Construir, 2.) Administración de Sistemas de Transporte/ Manejo de Demanda para el Transporte (TSM/TDM), 3.) BRT, 4.) LRT y 5.) un Túnel de Autopista.

國道710 (SR710) 研究評估運輸方案, 以改善在州2號公路, 5, 10, 210號州際公路和605在洛杉磯東部/東北部和聖蓋博谷地區之間的流動性和紓緩交通擠塞。研究考慮五種備選方案以及這些方案對周圍社區的影響。它們是 1.) 保持原貌, 2.) 交通運輸系統管理/交通需求管理(TSM/TDM), 3.) 快捷巴士系統 (BRT), 4.) 輕軌, 以及 5.) 修建高速公路隧道。

1 No-Build No-Construir 保持原貌

2 Transportation System Management/ Transportation Demand Management

Administracion de Sistemas de Transporte/ Manejo de Demanda para el Transporte

交通運輸系統管理/交通需求管理

The No Build Alternative includes transportation improvement projects inside and outside the Study Area, including all projects in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) programmed to be completed by 2035. Including these projects is required by state and federal laws to demonstrate that the need exists even if these projects are completed. For detailed information on proposed projects under the SCAG RTP, go to <http://rtpscs.scag.ca.gov>

La Alternativa de No-Construir incluye proyectos de mejora de transporte dentro y fuera del Área de Estudio, incluyendo todos los proyectos del Plan de Transporte Regional (RTP) de la Asociación de Gobiernos del Sur de California (SCAG) programados para ser completados en el 2035. La inclusión de estos proyectos es requerida por las leyes estatales y federales para demostrar que existe la necesidad, incluso si estos proyectos se han completado. Para obtener información detallada sobre los proyectos propuestos en el RTP de SCAG, vaya a: <http://rtpscs.scag.ca.gov>

保持原貌方案包括710研究區域內甚至研究區域以外的交通改善項目, 其中包括到2035年完成的南加州政府協會 (SCAG) 區域交通規劃 (RTP) 的計劃。即使這些項目竣工後, 也需要通過州和聯邦的法律證明其必要性。有關SCAG RTP擬建項目的詳細信息, 請訪問: <http://rtpscs.scag.ca.gov>

This Alternative includes:

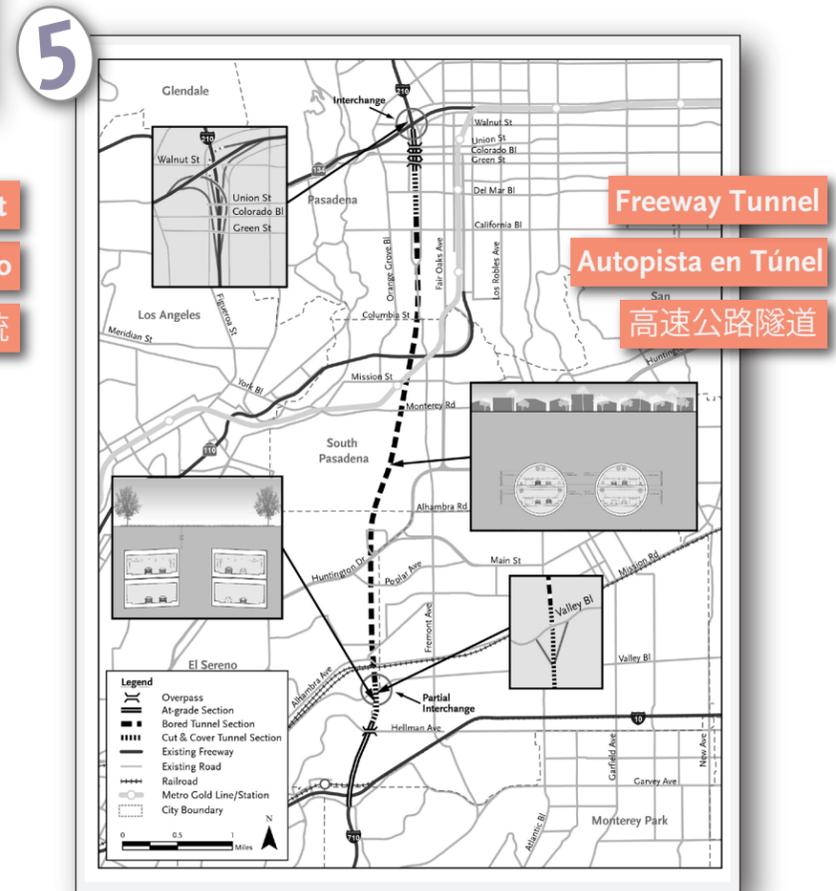
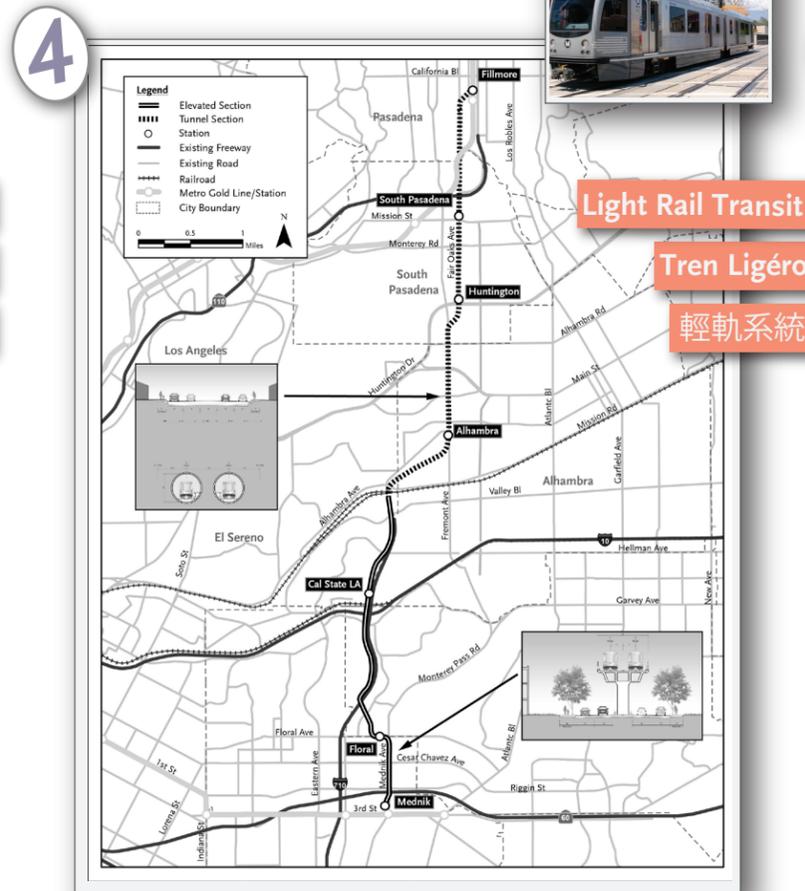
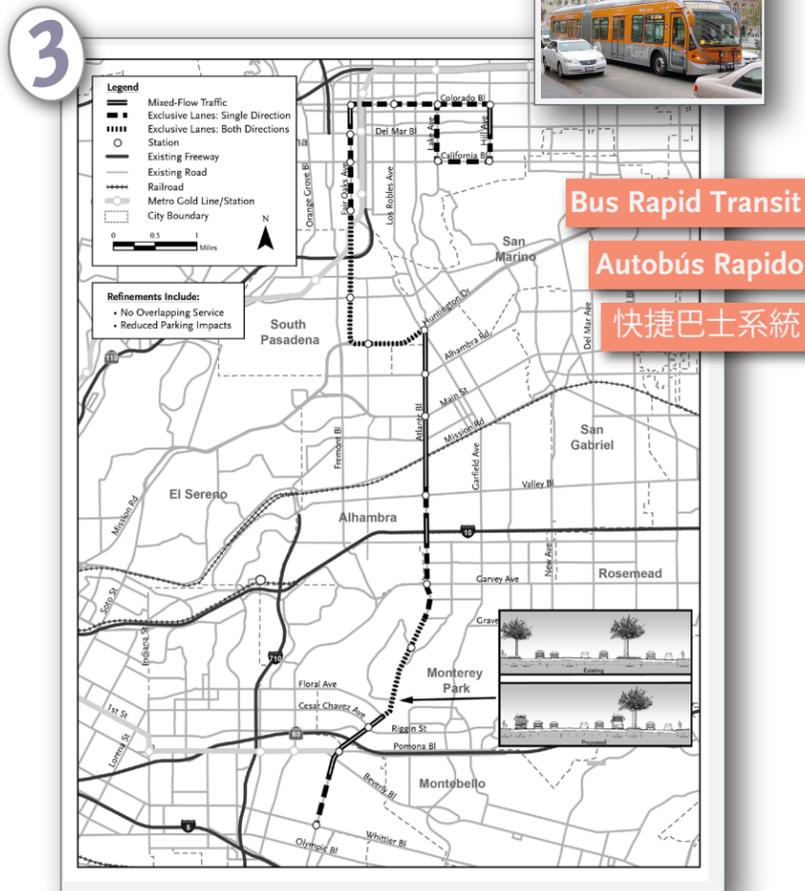
- Expanded Bus Service
- Traffic Light Synchronization
- Bike Paths
- Ridesharing
- Telecommuting
- Intersection and Road Improvements

Esta alternativa incluye:

- Servicio Ampliado de Autobuses
- Sincronización de Semáforos
- Carriles para Bicicletas
- Viajes Compartidos
- Teletrabajo
- Mejoras a Intersecciones y Calles Locales

備選方案包括:

- 擴展公車服務
- 交通燈同步
- 自行車道
- 拼車
- 遠程辦公
- 路口和道路改善工程



State Route 710 North Environmental Study Update

California Transportation Commission Briefing

December 2013



Metro



Study Area



Alternatives Under Study

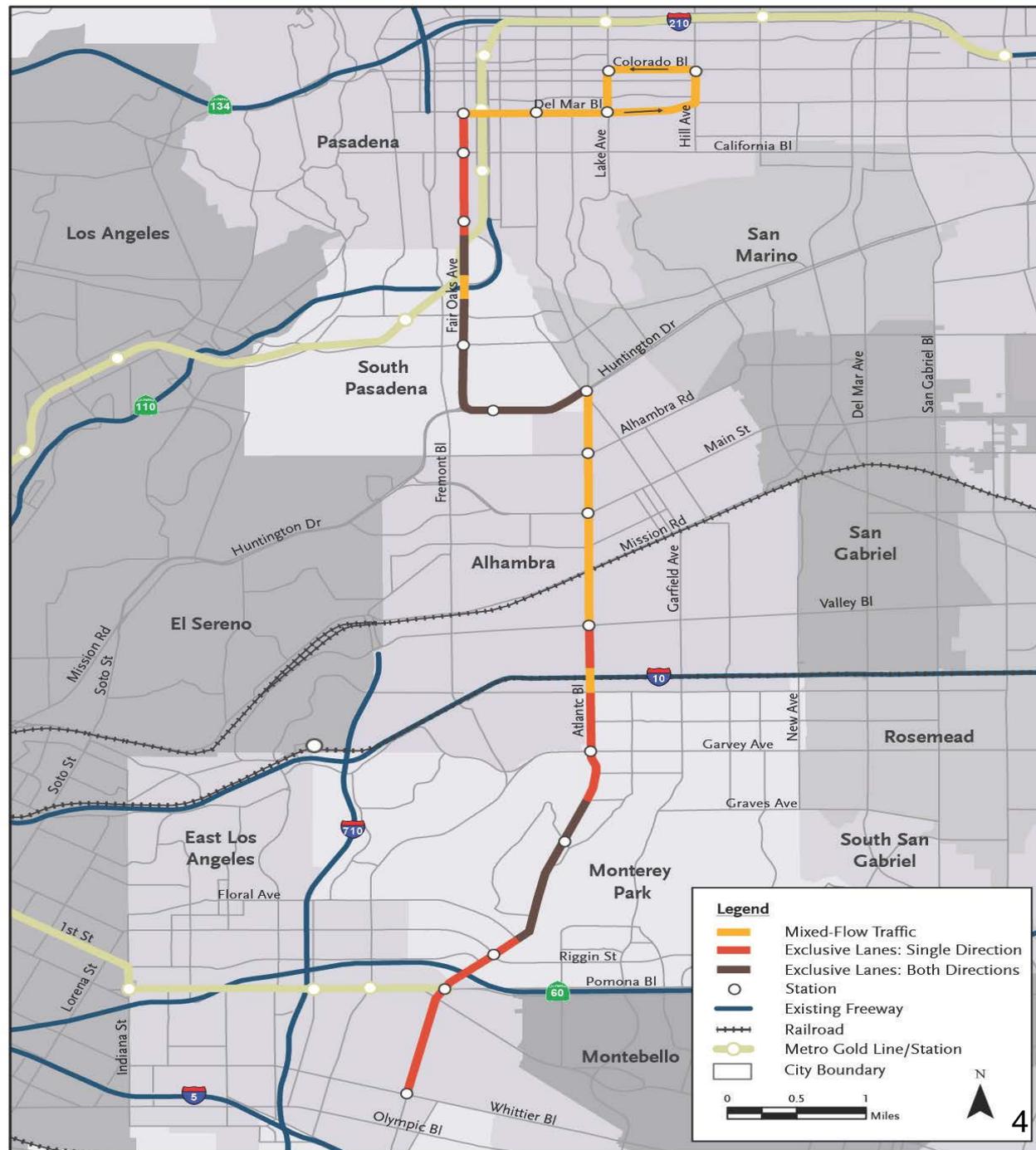
- 1) No Build
- 2) Transportation System Management (TSM)/
Transportation Demand Management (TDM)
- 3) Bus Rapid Transit (BRT)
- 4) Light Rail Transit (LRT)
- 5) Freeway Tunnel

To review the Alternative Analysis Report visit:

<http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/>

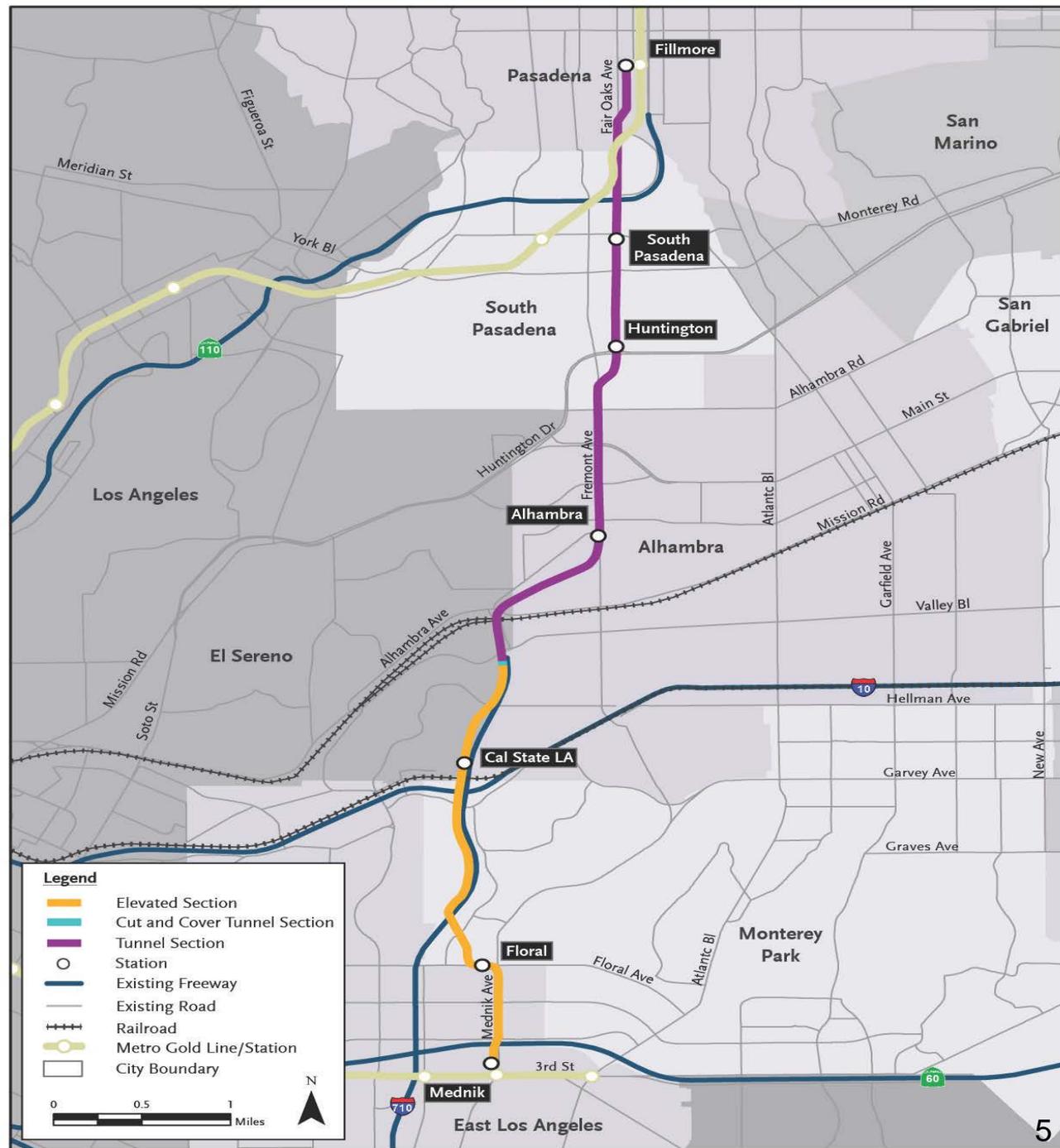
BRT

- Serves major destinations, high population/ employment centers, institutions
- On-street parking impacts reduced by limiting exclusive bus lanes to peak hours of travel
- Exploring new fare collection technologies to reduce delays at bus stops
- Further enhanced by feeder service



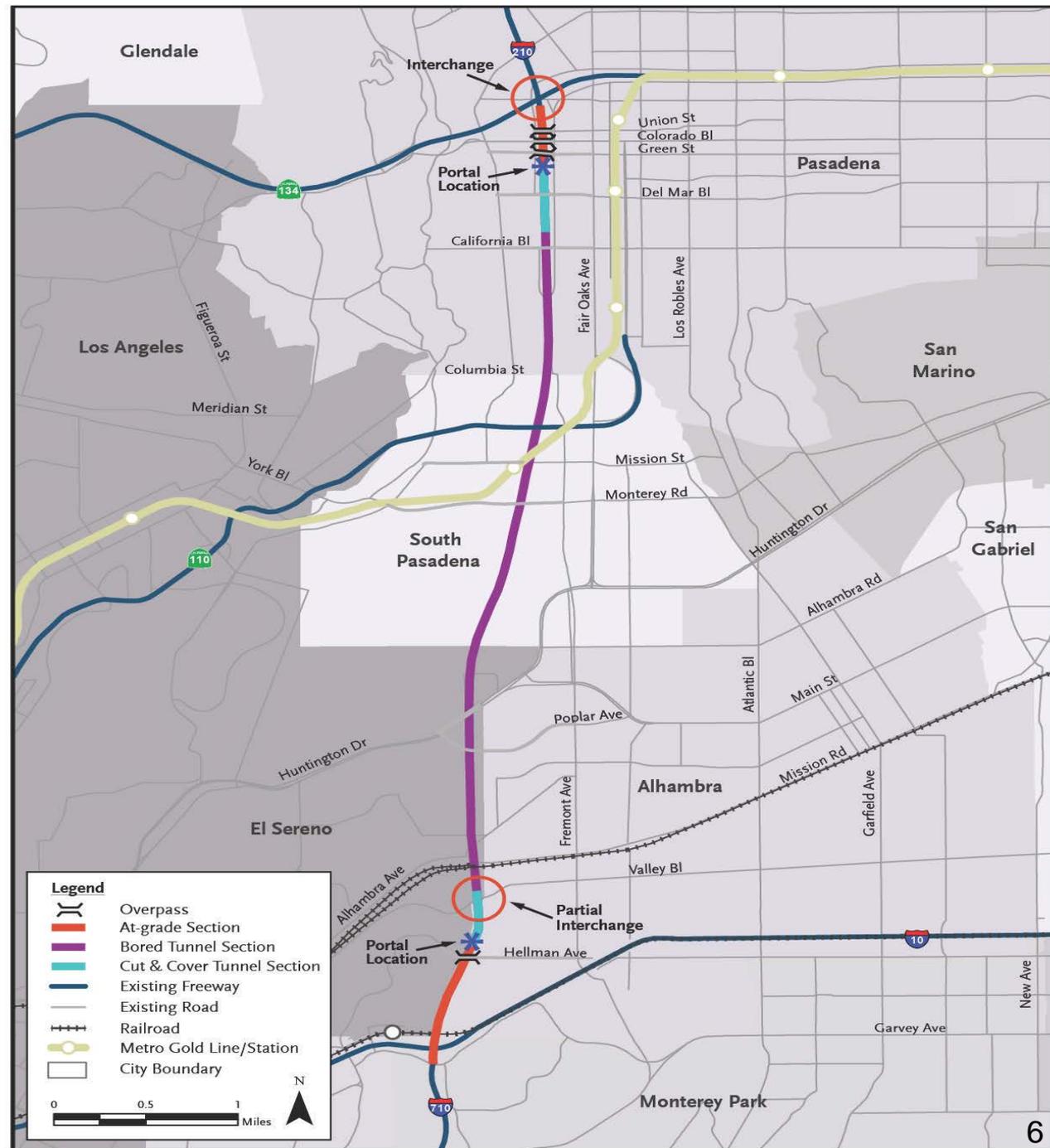
LRT

- Contains aerial and tunnel segments
- Coordinating with 1st responders, fire marshal, power companies and others
- Developing fire, life safety, ventilation, fault crossing and portal details
- Allows for disposal of soils via railroads
- Further enhanced by feeder service
- South-end refinements under consideration



Freeway Tunnel

- Agency coordination similar to LRT required
- Developing fire, life safety, ventilation, fault crossing, and portal details
- Provides for CHP enforcement area; OMC building
- Allows for soil disposal via railroads, freeways
- Single and double bores; with/without tolls; with/without trucks to be studied
- Provides feeder service for express bus



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www.metro.net/sr710study



(855) 4-SR-710-0 / (855) 477-7100 - toll free



sr710study@metro.net



Metro



Remedios, Douglas@DOT

From: Sabrina Leon [mailto:changemail.org]
Sent: Thursday, December 05, 2013 6:34 AM
To: Remedios, Douglas@DOT
Subject: 25 more people signed: Jennifer Perugini, Elizabeth Mathis...

25 people recently add their names to No 710 Tunnel Concerned Citizens's petition "Do not fund or build an SR 710 tunnel or freeway". That means more than 500 people have signed on.

There are now 625 signatures on this petition. Read reasons why people are signing, and respond to No 710 Tunnel Concerned Citizens by clicking here:

<http://www.change.org/petitions/do-not-fund-or-build-an-sr-710-tunnel-or-freeway/responses/new?response=5ac36839ed14>

Dear Commission Members,

Please do not fund or build an SR-710 tunnel or freeway. A 710 freeway will not solve traffic problems in the San Gabriel Valley 1. Increased freeway capacity generates increased freeway usage. If we 'relieve' traffic in the entire region by bringing it to the San Gabriel Valley, we increase the traffic level here. Metro's own estimate is an additional volume of 190,000 annual daily traffic trips if this freeway extension is built. 2. There is no benefit to increased traffic volume. Increased traffic volume means increased air congestion, increased pollution, adverse health effects and decreased quality of life. Do you want our driving experience to be like it is on the westside? This tunnel would open at service level "F" from day one. 3. San Gabriel Valley resident will NOT benefit from the 710 completion. A toll to use a 710 tunnel is required because it is so expensive - \$5.6 to \$14 billion - to build. Most motorists will not pay the estimated \$5.64 to \$20 toll fees to drive 4.5 miles. Instead they will divert to local residential streets, crawling along at slow speeds and spewing higher levels of pollutants into the local corridor's air. 4. The better alternative is a comprehensive multi-modal plan - increased light rail service, increased bus rapid transit service, better connections and creating work opportunities closer to home, not further away. We deserve a cleaner, healthier, greener community. Our cities do not exist to enable urban freight transport or other people's commutes. 5. Get involved! Visit the No710freewayextension facebook page and the No 710 Action Committee website for fully referenced facts, the latest news, and how to get involved. Opposition groups and Injunction plaintiffs include (partial list): California Preservation Foundation City of Glendale City of La Cañada Flintridge City of Los Angeles City of South Pasadena Crescenta Valley Town Council East Yard Communities for Environmental Justice Friends of the Earth Glassell Park Improvement Association Glendale Home Owners Coordinating Council Heartland Institute Highland Park Heritage Trust La Cañada Flintridge Unified School District Caltrans Tenants of the 710 Corridor Land Use Committee Far North Glendale Homeowners Association Los Angeles Conservancy National Trust for Historic Preservation Natural Resources Defense Council Pasadena Heritage Public Citizen San Rafael Neighborhoods Association Sierra Club South Pasadena Preservation Foundation South Pasadena Unified School District Taxpayers for Common Sense West Pasadena Residents' Association

Sincerely,

600. Jennifer Perugini Folsom, California
 601. Elizabeth Mathis Altadena, California
 602. Mimi Smith Los Angeles, California
 603. Mariana Baez Alhambra, California
 604. kristy kessler los angeles, California

605. Michael Steele Morrice, Michigan
606. Marisa Davis Los Angeles, California
607. Hannah Freed Pasadena, California
608. joel gibbons los angeles, California
609. Concerned Citizen New City, New York
610. Carol LaBrie South Pasadena, California
611. angela alvarez los angeles, California
613. Kiem Tang Alhambra, California
614. Niles Pierce South Pasadena, California
615. Scott Van Dellen La Canada, California
616. Janice SooHoo La Canada, California
617. Susan Bolan La Crescenta, California
618. Stephanie Jenkins Los Angeles, California
619. Cristina Parker Sierra Madre, California
620. Nancy Schlaifer South Pasadena, California
621. Gretchen Knudsen Los Angeles, California
622. Constance Brines Pasadena, California
623. Michael Saldana Pasadena, California
624. Bianca Richards South Pasadena, California
625. Sabrina Leon Pasadena, California

[Click here to unsubscribe from updates on this petition](#)

[Click here to unsubscribe from messages from Change.org](#)



Remedios, Douglas@DOT

From: Carl Matthes [mailto:changemail.org]
Sent: Sunday, December 08, 2013 7:42 AM
To: Remedios, Douglas@DOT
Subject: 100 new signers: Marchael Bayne, E. J. Hannan...

Another 100 people added their names to No 710 Action Committee's petition "[Remove the F7-X Tunnel Alternative from SR-710 North EIR/EIS in Favor of Better, more Fiscally and Environmentally Responsible Solutions!](#)" -- momentum is growing.

There are now 1100 signatures on this petition. Read reasons why people are signing, and respond to No 710 Action Committee by clicking here:

<http://www.change.org/petitions/remove-the-f7-x-tunnel-alternative-from-sr-710-north-eir-eis-in-favor-of-better-more-fiscally-and-environmentally-responsible-solutions/responses/new?response=f83ebd852443>

Dear All Commissioners,

I have reviewed the history, purpose and need for the State Route-710 North Corridor and support the development and implementation of a comprehensive 21st-century mobility and transportation alternative to the current limited and antiquated approach for the SR-710 North Extension. I recommend a multi-modal approach that may include implementation of Transportation System Management/Transportation Demand Management (TSM/TDM), Bus Rapid Transit and Light Rail individually or in combination, but DOES NOT INCLUDE a surface freeway or tunnel connecting the 710 and 210 Freeways. I oppose the connection of the 710 and 210 Freeways via surface freeway or tunnel for the following reasons:

- Construction of additional roadway lanes has traditionally been the most common congestion relief strategy used by transportation authorities. However, decades of research has demonstrated that expanding highways does not relieve congestion. Every 1% increase in new lane-miles generates a 0.9% increase in traffic in less than 5 years, effectively neutralizing any increase in capacity (http://www.no710.com/_better_solutions_ls/1-repurpose_the_710/highway-expansion-myth.pdf).
- The tolled tunnel will not relieve the congestion on surface streets in the study area. Metro's own data demonstrate that, after applying a projected toll-diversion rate of 35% (page 18 at <http://www.ci.south-pasadena.ca.us/modules/showdocument.aspx?documentid=346>) to the 24% of vehicles that constitute cut-through traffic wanting to reach the 210, the tolled tunnel would serve only 16% of the vehicles currently clogging the surface streets in the study area. Therefore, 84% of the vehicles currently using surface arterials will continue to do so (slide 30 at http://media.metro.net/projects_studies/sr_710/images/SR710_tac_meeting_9_021313.pdf). In fact, arterial traffic will actually increase due to the large number of vehicles exiting the freeway to avoid paying the toll (<http://www.ci.south-pasadena.ca.us/modules/showdocument.aspx?documentid=346>).
- The tolled tunnel is projected to handle 180,000 vehicles a day, more than four times the current figure of 44,000 in the region (http://media.metro.net/projects_studies/route_710/images/sr_710_fwy_tunnel_alt_fact_sheet_post_final_2012_1221.pdf). This increase in traffic will bring additional pollution to the communities and the many schools that are positioned directly adjacent to the 210 Freeway. The link between emissions from mobile sources to reduced lung capacity and major illnesses such as asthma, cancer, autism, more rapid progression of atherosclerosis and other health consequences is well-documented (http://www.no710.com/_resources/4-links_to_research-health_&_pollution_and_other/health-pollution-r-t.pdf).
- Roadway tunnels present inherent safety issues that cannot be mitigated (http://www.no710.com/_critical-issues-links/2-concerns/2-tunnel_info/6-tunneldangers.doc.pdf). Accidents in roadway tunnels have resulted in catastrophic fires and loss of life (http://www.no710.com/_critical-issues-links/2-concerns/2-tunnel_info/what-could-happen-sm.pdf). The SR-710 Tunnel would be 4.9 miles, the longest roadway tunnel in the United States and would pass through active seismic faults (page 8 at

<http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/docs/appendices/Appendix%20T%20Geotechnical%20Study%20Technical%20Memorandum.pdf>). • Cost estimates for the SR-710 Tunnel have been so wildly variable as to be unreliable. Over the past 20 years, estimates have ranged from \$1 -- \$14 Billion (http://no710.com/_critical-issues-links/3-cost/tunnelcost-estimates.pdf). The most recent estimate by Metro/Caltrans is \$5.425 Billion (page 167 at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/docs/Final_AA_report_2013-01-14_Low_Res.pdf). Because Metro has only \$740 Million available, construction of the tunnel necessitates a Public-Private Partnership (PPP), requiring that the tunnel will be a tolled facility. History has shown that if usage falls short of projections, taxpayers often must assume the balance of the construction and maintenance costs. • There is widespread vocal public opposition to a connection between the 710 and 210 Freeways. The cities of Glendale, La Cañada Flintridge, Los Angeles, Sierra Madre and South Pasadena have adopted formal resolutions opposing the connection. Additionally, over forty-five neighborhood councils, elected officials (including a US Congressman, State Senators and State Assemblymembers), school districts, chambers of commerce and other environmental and civic organizations have adopted resolutions or issued statements expressing their opposition to the extension (<http://www.no710.com/resources.html>). We urge Caltrans to remove themselves from the property management business and sell the more than 500 homes in the 710 Corridor. Its poor management of SR-710 Extension project properties costs the State millions of dollars annually. This bad relationship between tenants and landlord must end now (<http://www.bsa.ca.gov/reports/summary/2011-120>). The No 710 Action Committee is a fast-growing association of cities, organizations, professionals and citizens who realize that the SR-710 Tunnel is an unacceptable alternative to address regional transportation problems. Our mission is to promote solutions that are environmentally and fiscally sound, reduce pollution, lower health risks, relieve congestion, and eliminate public dependence on fossil fuels. The No 710 Action Committee demands that transportation authorities operate in an honest and transparent manner that is responsive to the concerns and interests of the impacted communities and the public at large (<http://www.no710.com/>).

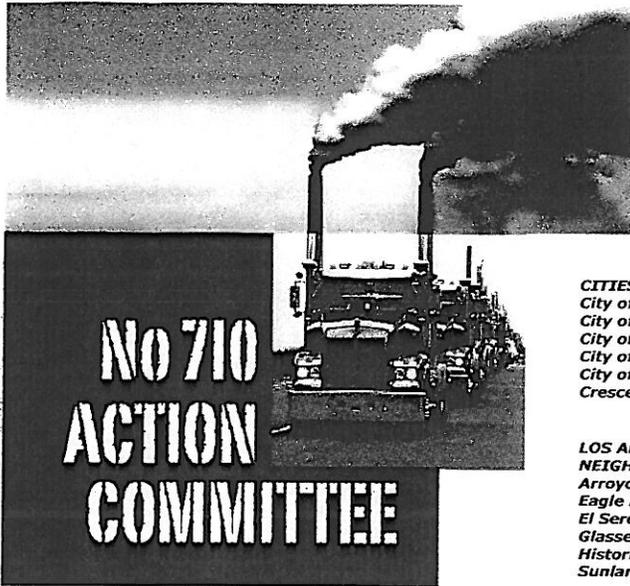
Sincerely,

1001. Marchael Bayne South Pasadena, California
1002. E. J. Hannan Pasadena, California
1003. Christine Willard South Pasadena, California
1004. Jamie Perigo Oak View, California
1005. Maura Rountree-Brown La Canada, California
1006. Ameer Foss Los Angeles, California
1007. greg wilkin la crescenta, California
1008. Craig Jennings Milford, Connecticut
1009. John Raymond South Pasadena, California
1010. Larisa Boiko los angeles, California
1011. Eric Goldreich Pasadena, California
1012. Leonda Spaugy Pasadena, California
1013. Kevin Raymond South Pasadena, California
1014. Phil Rowland South Pasadena, California
1015. Emily Rankin Orange, California
1016. Brian Raymond San Clemente, California
1017. William Weisman Glendale, California
1018. Randolph Heard Los Angeles, California
1019. Kay Onderdonk Pasadena, California
1020. Susan Bauman PASADENA,, California
1021. Julie Hinman South Pasadena, California
1022. Feliciano Gonzalez Los Angeles, California
1023. Bernard Gilpin Pasadena, California

1024. Jill Itagaki South San Gabriel, California
1025. Robert Itagaki South San Gabriel, California
1026. Riener Nielsen Pasadena, California
1027. Carrie Douangsitthi South Pasadena, California
1028. Tina Kistingner South Pasadena, California
1029. Zinda Lozano Chula Vista, California
1030. Priscilla Flynn Pasadena, California
1031. Peter Healey Los Angeles, California
1032. Jennifer Madden Pasadena, California
1033. Kristen Brakeman La Canada, California
1034. Mitzie Nielsen Pasadena, California
1035. Alan Ehrlich South Pasadena, California
1036. Elizabeth Cavanaugh South Pasadena, California
1037. daphna enzer south pasadena, California
1038. leslie Miller La Canada, California
1039. Christine Ginty Los Angeles, California
1040. karan Tarallo-Lizarazu Pasadena, California
1041. Leni Ferrero South Pasadena, California
1042. ann drummond la canada, California
1043. Dana Kitchens Pasadena, California
1044. Paul Carden Los Angeles, California
1045. Elizabeth Kerrigan Sierra Madre, California
1046. marilyn Smith pasadena, California
1047. James Kirby Pasadena, California
1048. Ann White Pasadena, California
1049. Mona Patel San Francisco, California
1050. Scott Brown Pasadena, California
1051. Jude Lausten Sierra Madre, California
1052. Margaret Stewart Pasadena, California
1053. Paulett Liewer La Canada, California
1054. John Price Pasadena, California
1055. Melissa Levandis South Pasadena, California
1056. Jan VanDiver Pasadena, California
1057. Morgan Fotoohi Pasadena, California
1058. Amy Onderdonk Pasadena, California
1059. Paul Andres Altadena, California
1060. Deborah Ross Sierra Madre, California
1061. John McClure Palm Springs, California
1062. Steve Elkins pasadena, California
1063. Jess Mullen-Carey South Pasadena, California
1064. Brian Moe South Beloit, Illinois
1065. Linda DeLaire Cathedral City, California
1066. DOROTHY WOODDELL LA CANADA, California
1067. Rhonda Dagher Pasadena, California
1068. Janis L Strout Bozeman, Montana
1069. Phinney Ahn Los Angeles, California
1069. Scott Thompson Studio City,, California
1070. Mary Gandsey Pasadena, California
1071. Patricia Nicholson La Crescenta, California
1072. Cyndi Newton Sherman Oaks, California
1073. Steve Sparkman Murrieta, California

1074. Sam Coleman Pasadena, California
1075. Yasmin Perez Somewhere in nature., California
1076. Peg Rogers Pasadena, California
1077. Adriana Alvarez Los Angeles, California
1078. Robert Galbraith South Pasadena, California
1079. evelyn gilmartiin pasadena, California
1080. Raquel Donchey Pasadena, California
1081. Timothy Searight South Pasadena, California
1082. Jacqueline Neufeldt Los Angeles, California
1083. Yvonne LeGrice Pasadena, California
1084. Betty Stanson Pasadena, California
1085. Joseph Stephens Pasadena, California
1086. Michele Clark South Pasadena, California
1087. Kim Chavarria Pasadena, California
1088. Angelita O'Brien Pasaadena, California
1089. Suzanne Gilman Pasadaena, California
1090. Brian Gilman Pasadena, California
1091. Jim Harnagel Pasadena, California
1092. Thambimuttu Jeyaranjan Pasadena, California
1093. Sally Rentschler Los Angeles, California
1094. monique leblanc los angeles, California
1095. Marida Torrey Portland, Oregon
1096. p groves philadelphia, Pennsylvania
1097. Mimi Wilhelm Los angels, California
1098. Ann Swanson Novato, California
1099. Irene Wong South Pasadena, California





OPPOSITION GROUPS (PARTIAL LIST)
LA RED, El Sereno
Caltrans Tenants of the 710 Corridor
Glassell Park Improvement Association
Far North Glendale Homeowners Association
San Rafael Neighborhoods Association
West Pasadena Residents Association
Highland Park Heritage Trust
La Canada Unified School District
Glendale Homeowners Coordinating Council
East Yard Communities for Environ. Justice
Natural Resources Defense Council

CITIES
City of Glendale
City of La Canada Flintridge
City of Los Angeles
City of Sierra Madre
City of South Pasadena
Crescenta Valley Town Council

**LOS ANGELES
NEIGHBORHOOD COUNCILS**
Arroyo Seco
Eagle Rock
El Sereno
Glassell Park
Historic Highland Park
Sunland - Tujunga

INJUNCTION PLAINTIFFS
City of South Pasadena
Sierra Club
National Trust for Historic Preservation
California Preservation Foundation
Los Angeles Conservancy
Pasadena Heritage
South Pasadena Preservation Foundation
South Pasadena Unified School District

2010 & 2011 GREEN SCISSORS REPORTS
Environment America
Friends of the Earth
Taxpayers for Common Sense
The Heartland Institute
Public Citizen

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no710extension@aol.com
no710.com**

California Transportation Commission
1120 N Street, Room 2221
Sacramento, CA 95814

Re: Comment on LA Metro Update on Route 710 North Study

Honorable Members of the Commission:

The No on 710 Action Committee offers the following comment as the Commission receives its report today on the Route 710 North study.

The Committee first wishes to express its appreciation for the State Administration's support of Senator Liu's SB 416, which has been signed by the Governor and is now enacted as chapter 468 of the 2013 California Statutes. We value the cooperation and support by the Transportation Agency and Department of Transportation to secure this legislation that removes a surface freeway alternative from further consideration under state law as a route 710 extension project. We also value the commitment of Agency and Caltrans to early preparation of regulations that will lead to State disposition of properties acquired in anticipation of a surface freeway extension.

As the Commission receives a report on the Route 710 North Study, the Committee wishes to emphasize these points.

First, we agree with Caltrans that the Department, and only the Department, is lead agency for the EIR/EIS that may emerge from this process. The California Environmental Quality Act (CEQA) provides, in contrast to the National Environmental Policy Act (NEPA), that only one agency can serve as lead agency, and that because of its responsibility for state highway development, Caltrans is that single lead agency. Moreover, in order for California to serve as an appropriate delegate of the Federal Highway Administration (FHWA) for preparation of a NEPA environmental impact statement, the State itself must act as the NEPA lead agency, and cannot re-delegate that responsibility to a local or regional agency.

Second, the Los Angeles County Metropolitan Transportation Authority (LA Metro) is actually preparing the environmental assessment under contract with Caltrans as lead agency. This arrangement creates the inherent risk, present whenever a lead agency assigns EIR preparation to a project proponent, that the emerging draft and final EIS/EIR will reflect LA Metro's judgment, but not the legally-required independent judgment of Caltrans. As the study proceeds, therefore, the Department and ultimately this Commission will need to exercise vigilance to ensure a rigorous and disciplined analysis.

Third, the "Measure R - \$780M" secured funds listed in the staff fact sheet are not dedicated to a particular alternative, and in particular not to the "freeway tunnel" alternative. In response to the claim of La Cañada Flintridge and South Pasadena that including a freeway tunnel 710 extension in Measure R constituted premature commitment to that

project, LA Metro represented to the court of appeal that "Measure R does not, in itself, authorize implementation of specific projects," and that such funding will only apply to projects "found to be feasible and to meet other objectives, and considered and approved by the lead agency." Thus Caltrans and not LA Metro will make the ultimate decision if Measure R funds are to be applied to a state highway.

Fourth, the financial feasibility of the most costly alternative under study, a freeway tunnel, has never been established. Because one of the December 2003 FHWA specifications for consideration of future federal funding in the route 710 corridor requires assured financial feasibility, LA Metro this summer wisely declined to "accelerate" consideration of a freeway tunnel alternative. Unfortunately, LA Metro in response to tunnel proponents subsequently rescinded that action. This history further suggests that this Commission and Caltrans will need to assert discipline over the 710 North Study.

Finally, the Commission should take note that a freeway tunnel alternative is opposed by all cities directly in the path of that tunnel alternative, and others that would be adversely affected: Los Angeles, Pasadena, South Pasadena, Sierra Madre, Glendale, and La Cañada Flintridge. Such virtually universal community opposition does not lend itself to a conclusion that the freeway tunnel alternative can emerge as "feasible."

The Committee thanks the Commission for the consideration of these views.


Respectfully submitted,
The No 710 Action Committee