710 North Gap Closure

Scoping Summary Report Volume II

9/1/2011
California Department of Transportation
Division of Environmental Planning (MS-16A)
100 S. Main St. Los Angeles, CA 90012
SCH No.: 1982092310
Caltrans Project No.: 0700000191 (EA: 187900)

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Appendix A – Notice of Preparation / Notice of Intent

SCH NO. _____

NOTICE OF PREPARATION

To: _____

From: California Dept. of Transportation
100 S. Main Street, MS 16-A
Los Angeles, CA 90012

Subject: **Notice of Preparation of a Draft Environmental Impact Report**
Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Project Title: State Route 710 North Gap Closure Project

Project Location: Depending on the alternative selected, this project would be located in the study area bordered by Interstate 10 to the south, Interstate 605 to the east, Interstate 210 to the north, and State Route 2 to the west, in Los Angeles County, California.

Project Description: The proposed project, depending on the results of a thorough environmental analysis of all possible transportation improvements during the NEPA/CEQA process, may include, but not be limited to: surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems, local street upgrades, traffic management systems and a no build alternative. There currently is a gap in the I-710 corridor, for a distance of approximately 4.5 miles (7.2km), which extends between Valley Boulevard to the south and Del Mar Boulevard to the north. As originally identified in the April 13, 1998 Record of Decision for the Meridian Variation alignment, this gap contributes to congestion on local streets and the regional freeway system. The objective of this project is to relieve congestion and improve mobility within the study area.

This is to inform you that the California Department of Transportation will be the lead agency and will prepare an Environmental Impact Report (EIR) for the project described above. Your participation as a responsible agency is requested in the preparation and review of this document.

We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

A location map and the potential environmental effects are contained in the attached materials.

Caltrans will be holding public scoping meetings to provide an overview of the project, summary of the environmental process and issues addressed, and receive input regarding environmental issues and the suggested scope and content of the EIR. The Scoping meetings will be held in San Gabriel, Alhambra, Glendale, South Pasadena, El Sereno, and Pasadena. More information on the scoping meetings are in the attached materials.

A copy of the Initial Study (___is) (__x_is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please direct your response to Ron Kosinski, Deputy District Director Telephone (213) 897-0703 at the address shown above. Please supply us with the name for a contact person in your agency.

Date Feb 28, 2011 Signature Ronald Kosinski

Title DEPUTY DIST. DIR. ENV. PLANNING

Scoping Meetings: An Agency Scoping Meeting will be held in Los Angeles, March 14, 2011, 2pm to 4pm, Caltrans, District 7 Headquarters, RM 1.040 100 S. Main Street, 90012.

Public Scoping Meetings will be held at the following locations:

- **San Gabriel,** March 15, 2011, 6pm to 8pm Jefferson Middle School, 1372 East Las Tunas Drive, 91776
- **Alhambra,** March 16, 2011, 6pm to 8pm Civic Center Library, 101 S. First Street, 91801
- **Glendale,** March 22, 2011, 6pm to 8pm Glendale Community College, 1500 North Verdugo Road, 91208
- **South Pasadena,** March 23, 2011, 6pm to 8pm South Pasadena High School, 1401 Fremont Ave., 91030
- **El Sereno,** March 29, 2011, 6pm to 8pm LA Christian Presbyterian Church, 2241 N. Eastern Ave., 90032
- **Pasadena,** March 30, 2011, 6pm to 8pm Lake Avenue Church, 393 N. Lake Ave., 91101

Impacts:
Various environmental and community resources are known to exist within the limits of the study area. These resources include, but are not limited to: geotechnical, erosion, hydrology, air quality, water quality, noise, biology, public utilities, vehicle traffic patterns, parking, land use planning and hazardous waste. Displacement of businesses and homes is a significant issue. Soundwalls, relocation assistance, construction impact management and other mitigation measures will be incorporated into the proposed project.

It is anticipated that the proposed project may require the following federal approvals and permits: a Biological Opinion from the United States Fish and Wildlife Service, approval of a PM10 and PM2.5 Hot Spot Analysis by the Conformity Working Group for transportation conformity determination under the Clean Air Act. Section 404 nationwide permit from the U.S. Army Corps of Engineers, Section 401 Water Quality Certification from the California Regional Water Quality Control Board, Section 1601 Streambed Alteration Agreement from the California Department of Fish and Game, and encroachment permits from the various cities in which project construction would occur.

comments were received.[15] Because proposed Section 16(a) is substantially similar to the ISE, NYSE Arca, and FINRA rules, it raises no new regulatory issues.

The Commission also believes that good cause exists to grant accelerated approval to proposed Section 16(b) to Chapter III, which conforms the Exchange rule to the requirements of Section 6(b)(10) of the Act. Section 6(b)(10) of the Act, enacted under Section 957 of the Dodd-Frank Act, does not provide for a transition phase, and requires rules of national securities exchanges to prohibit broker voting on the election of a member of the board of directors of an issuer (except for a vote with respect to the uncontested election of a member of the board of directors of any investment company registered under the Investment Company Act of 1940), executive compensation, or any other significant matter, as determined by the Commission by rule. The Commission believes that good cause exists to grant accelerated approval to proposed Section 16(b) to Chapter III, because it will conform the Box rules to the requirements of Section 6(b)(10) of the Act.

V. Conclusion

It is therefore ordered, pursuant to Section 19(b)(2) of the Act,[16] that the proposed rule change (SR–BX–2011–011) be, and it hereby is, approved on an accelerated basis.

For the Commission, by the Division of Trading and Markets, pursuant to delegated authority.[17]

Cathy H. Ahn,

Deputy Secretary.

[FR Doc. 2011–5304 Filed 3–8–11; 8:45 am]

BILLING CODE 8011–01–P

[15] *See* note 8 *supra.*

[16] 15 U.S.C. 78s(b)(2).

[17] 17 CFR 200.30–3(a)(12).

DEPARTMENT OF TRANSPORTATION

Federal Highway Administration

Environmental Impact Statement: Los Angeles County, CA

AGENCY: Federal Highway Administration (FHWA), DOT.

ACTION: Notice of intent.

SUMMARY: The FHWA, on behalf of the California Department of Transportation (Caltrans), is issuing this notice to advise the public that a Draft Environmental Impact Statement will be prepared for a proposed highway project in Los Angeles County, California.

DATES: Public Scoping Meetings will be held at the following locations:

San Gabriel, March 15, 2011, 6 p.m. to 8 p.m.

Alhambra, March 16, 2011, 6 p.m. to 8 p.m.

Glendale, March 22, 2011, 6 p.m. to 8 p.m.

South Pasadena, March 23, 2011, 6 p.m. to 8 p.m.

El Sereno, March 29, 2011, 6 p.m. to 8 p.m.

Pasadena, March 30, 2011, 6 p.m. to 8 p.m.

An online Virtual Scoping Meeting will be held on March 21, 2011. Register to participate at *metro.net/sr710conversations* and click the "Participate from Home" tab. (It will begin live at 6 p.m. and continue on demand through April 14, 2011).

ADDRESSES: San Gabriel—Jefferson Middle School, 1372 East Las Tunas Drive, San Gabriel, CA 91776.

Alhambra—Civic Center Library, 101 S. First Street, Alhambra, CA 91801.

Glendale—Glendale Community College, (Student Center RM 212), 1500 North Verdugo Road, Glendale, CA 91208.

South Pasadena—South Pasadena High School, (Auditorium), 1401 Fremont Ave., South Pasadena, CA 91030.

El Sereno—LA Christian Presbyterian Church, (Gymnasium), 2241 N. Eastern Ave., Los Angeles, CA 90032.

Pasadena—Lake Avenue Church, (4th floor above Harris Hall), 393 N. Lake Ave., Pasadena, CA 91101.

FOR FURTHER INFORMATION CONTACT: Ronald Kosinski, Deputy District Director, California Department of Transportation, District 7, Division of Environmental Planning, 100 South Main Street, Mail Stop 16A, Los Angeles, CA 90012.

SUPPLEMENTARY INFORMATION: Effective July 1, 2007, the Federal Highway Administration (FHWA) assigned, and the California Department of Transportation (Caltrans) assumed, environmental responsibilities for this project pursuant to 23 U.S.C. 327. Caltrans as the delegated National Environmental Policy Act (NEPA) agency will prepare a Draft Environmental Impact Statement on a proposal for the State Route 710 Gap North Closure project in Los Angeles County, California. The proposed project, depending on the results of a thorough environmental analysis of all possible transportation improvements during the NEPA/CEQA process, may include, but not be limited to: surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems, local street upgrades, traffic management systems and a no build alternative. There currently is a gap in the I–710 corridor, for a distance of approximately 4.5 miles (7.2 km), which extends between Valley Boulevard to the south and Del Mar Boulevard to the north. As originally identified in the April 13, 1998 Record of Decision for the Meridian Variation alignment, this gap contributes to congestion on local streets and the regional freeway system. The objective of this project is to relieve congestion and improve mobility within the study area.

It is anticipated that the proposed project may require the following federal approvals and permits: a Biological Opinion from the United States Fish and Wildlife Service, approval of a PM10 and PM2.5 Hot Spot Analysis by the Conformity Working Group for transportation conformity determination under the Clean Air Act. Section 404 nationwide permit from the U.S. Army Corps of Engineers, Section 401 Water Quality Certification from the California Regional Water Quality Control Board, Section 1601 Streambed Alteration Agreement from the California Department of Fish and Game, and encroachment permits from the various cities in which project construction would occur.

Letters describing the proposed action and soliciting comments will be sent to appropriate Federal, State, Participating Agencies, Tribal Governments and local agencies, and to private organizations and citizens who have previously expressed or are known to have interest in this proposal. The public scoping process will officially begin in March 2011. Public scoping meeting(s) will be held in San Gabriel, Alhambra, Glendale, South Pasadena, Los Angeles, El Sereno, and Pasadena in March 2011. In addition, one online Virtual Scoping Meeting will be held on March 21, 2011. (It will begin live at 6 p.m. and continue on demand through April 14, 2011). Further, a public hearing will be held once the Draft Environmental Impact Statement is completed. Public notice will be given of the time and place of the meeting and hearing. The Draft Environmental Impact Statement will be available for public and agency review and comment prior to the public hearing to ensure that the full range of issues related to this proposed action are addressed and all significant issues identified, comments, and suggestions are invited from all interested parties. Comments or questions concerning this proposed action and the EIS should be directed to Caltrans at the address provided above.

(Catalog of Federal Domestic Assistance Program Number 20.205, Highway Planning and Construction. The regulations implementing Executive Order 12372 regarding intergovernmental consultation on Federal programs and activities apply to this program.)

Issued on: March 3, 2011.

Shawn E. Oliver,

Federal Highway Administration, Sacramento, California.

[FR Doc. 2011–5407 Filed 3–8–11; 8:45 am]

BILLING CODE 4910–22–P

DEPARTMENT OF THE TREASURY

Departmental Offices Proposed Collections; Comment Requests

ACTION: Notice and request for comments.

SUMMARY: The Department of the Treasury, as part of its continuing effort to reduce paperwork burdens, invites the general public and other Federal agencies to comment on a proposed information collection, as required by the Paperwork Reduction Act of 1995, Public Law 104–13 (44 U.S.C. 3506(c)(2)(A)). The Consumer Financial Protection Bureau implementation team is soliciting comments regarding forms for questions, complaints, and other information about consumer financial products and services.

DATES: Written comments should be received on or before May 9, 2011 to be assured of consideration.

ADDRESSES: Direct all written comments to Andrew Trueblood, Consumer Financial Protection Bureau implementation team, 1801 L Street, NW., Washington, DC 20036.

FOR FURTHER INFORMATION CONTACT: Requests for additional information should be directed to Andrew Trueblood in writing at Consumer Financial Protection Bureau implementation team, 1801 L Street, NW., Washington, DC 20036, by telephone at (202) 435–7070, or by e-mail at *andrew.trueblood@treasury.gov.*

SUPPLEMENTARY INFORMATION:

Title: Consumer Financial Protection Bureau Consumer Response Intake Fields.

OMB Control Number: NEW.

Abstract: The Dodd-Frank Wall Street Reform and Consumer Protection Act, Public Law 111–203, Title X, established the Consumer Financial Protection Bureau (CFPB). Among the CFPB's functions is to facilitate the centralized collection of, monitoring of, and response to complaints concerning consumer financial products and services. In order to collect data about the consumer financial market and facilitate the appropriate routing of, handling of, and response to complaints, questions, and other information concerning consumer financial products and services, the CFPB is developing online and paper intake methods which will have fields for persons to complete. The fields will help document information such as the type of contact; the substance of the complaint, question, or other information; contact information for the person making the contact and/or related persons; information about any subject incident and institution; and identifying information about the consumer or consumer's household.

Type of Review: NEW.

Affected Public: Individuals and households with questions, complaints, and other information about consumer financial products and services.

Estimated Number of Respondents: Approximately 1–3 million per year. CFPB's intake of complaints, questions, and other information relating to consumer financial products and services is a new collection that may centralize intake now performed by existing agencies. As such, the projections of the number of respondents have a high level of uncertainty.

Estimated Average Time per Respondent: 10 minutes per response. The time to complete the form will depend on the nature of the contact. Simple feedback may take as little as a few minutes to complete while more complicated complaints could take longer to describe.

Estimated Total Annual Burden Hours: Approximately 330,000 burden hours.

Request for Comments: Comments submitted in response to this notice will be summarized and/or included in the request for Office of Management and Budget approval. All comments will become a matter of public record. The public is invited to submit written comments concerning: (a) Whether the intake of complaints, questions, and other information relating to consumer financial products and services is necessary for the proper performance of the functions of the Bureau, including whether the information will have practical uses; (b) the accuracy of the above estimate of the burden of the information collection; (c) ways to enhance the quality, usefulness, and clarity of the information to be collected; (d) ways to minimize the reporting and/or record keeping burdens on respondents, including the use of automated collection techniques or other forms of information technology; (e) estimates of capital or start-up costs of operation, maintenance, and purchase of services to provide information; and (f) specific types of information that would be useful for CFPB to collect through its intake forms, in order to advance the mission of CFPB.

Robert Dahl,

Treasury Departmental Clearance Officer.

[FR Doc. 2011–5349 Filed 3–8–11; 8:45 am]

BILLING CODE 4810–25–P

DEPARTMENT OF THE TREASURY

Submission for OMB Review; Comment Request

March 3, 2011.

The Department of the Treasury will submit the following public information collection requirements to OMB for review and clearance under the Paperwork Reduction Act of 1995, Public Law 104–13 on or after the date of publication of this notice. A copy of the submissions may be obtained by contacting the Treasury Department Office Clearance Officers listed. Comments regarding these information collections should be addressed to the OMB reviewer listed and to the Treasury PRA Clearance Officer, Department of the Treasury, 1750 Pennsylvania Avenue, NW., Suite 11020, Washington, DC 20220.

Dates: Written comments should be received on or before April 8, 2011 to be assured of consideration.

Departmental Offices (DO)

Summary: As part of a Federal Government-wide effort to streamline the process to seek feedback from the public on service delivery, the Department of the Treasury has submitted a Generic Information Collection Request (Generic ICR): "Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery" to OMB for approval under the Paperwork Reduction Act (PRA) (44 U.S.C. 3501 *et seq.*). Treasury is requesting clearance for eight separate OMB Control Numbers for eight bureaus and offices within the Department. Each clearance will have the same title and purpose, but will be available for use by each bureau under their control number and burden estimate, as detailed below.

Title: Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery.

Abstract: The information collection activity will garner qualitative customer and stakeholder feedback in an efficient, timely manner, in accordance with the

Appendix B – Preliminary Project Purpose and Need

I-710 GAP CLOSURE PROJECT

PRELIMINARY STATEMENT OF PURPOSE AND NEED
September 3, 2010

Introduction

The following is intended to serve as a Preliminary Statement of the Need and Purpose for an I-710 Gap Closure Project. This Statement has been prepared solely for the purpose of initiating discussions during the scoping process for the Project, pursuant to the Los Angeles County Metropolitan Transportation Authority (Metro) Board of Director's Motion of June 24, 2010. It should be understood that this Statement is preliminary in nature and will be subject to further substantiation and refinement as technical studies conducted for the Project proceed.

Proposed Purpose and Need Statement

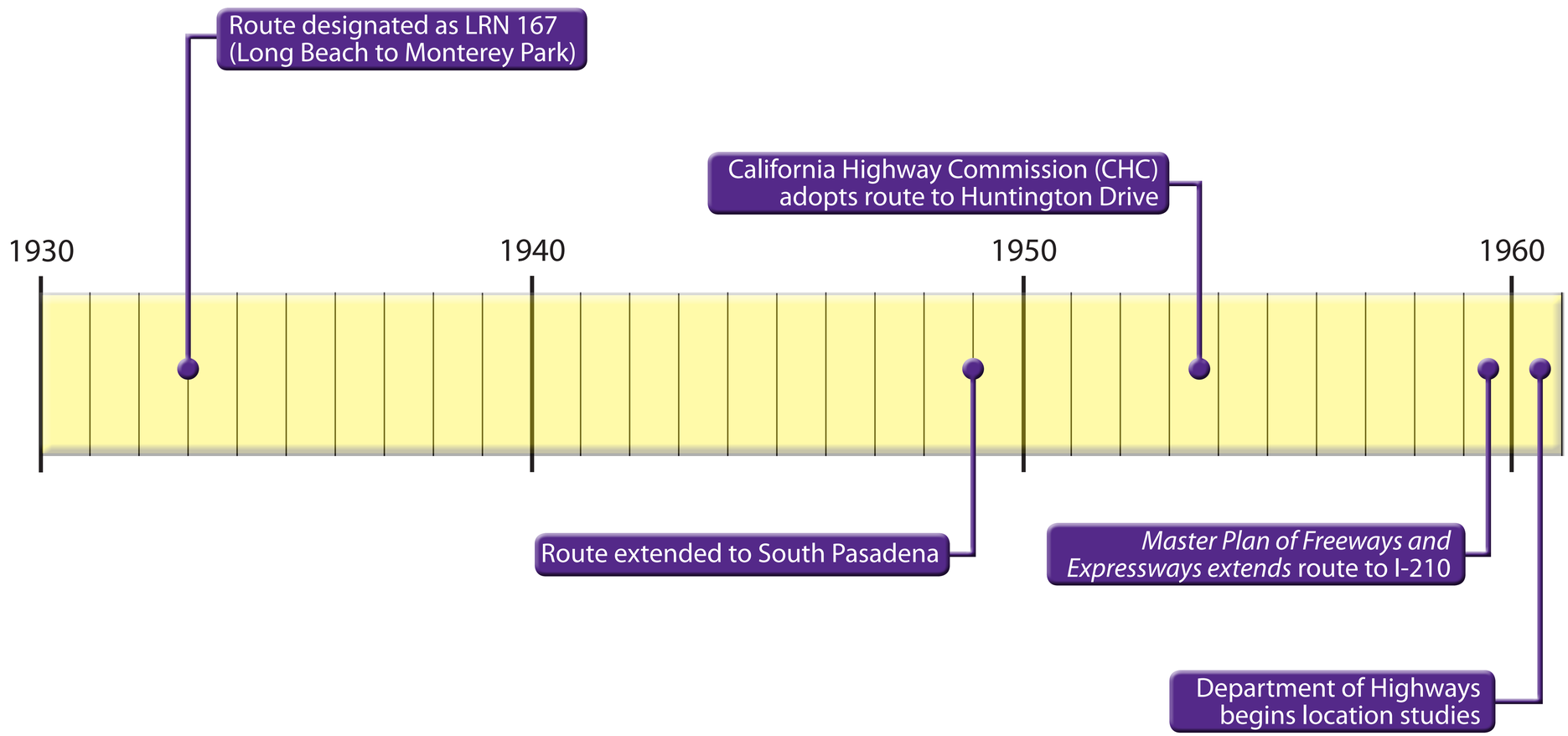
The following is a preliminary statement on the Purpose and Need for a project. Further refinements to this statement will occur pending the outcome Public Scoping and related technical studies.

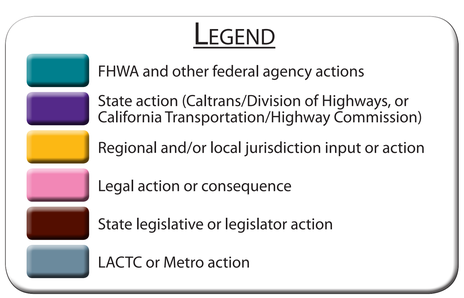
The Purpose and Need for a project is as follows:

- Improve regional mobility and accessibility for the movement of people, goods and services.
- Reduce circuitous out-of-direction travel on the network.
- Reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips.
- Improve regional travel time savings and thereby reduce loss of productivity associated with congestion.
- Provide additional connectivity in the regional network for use by public transit.
- Improve regional and local mobile source air quality characteristics.
- Promote reduced greenhouse gas production from mobile sources.
- Provide a project that constrains impacts in local communities to acceptable levels.
- Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including Public-Private Partnerships.

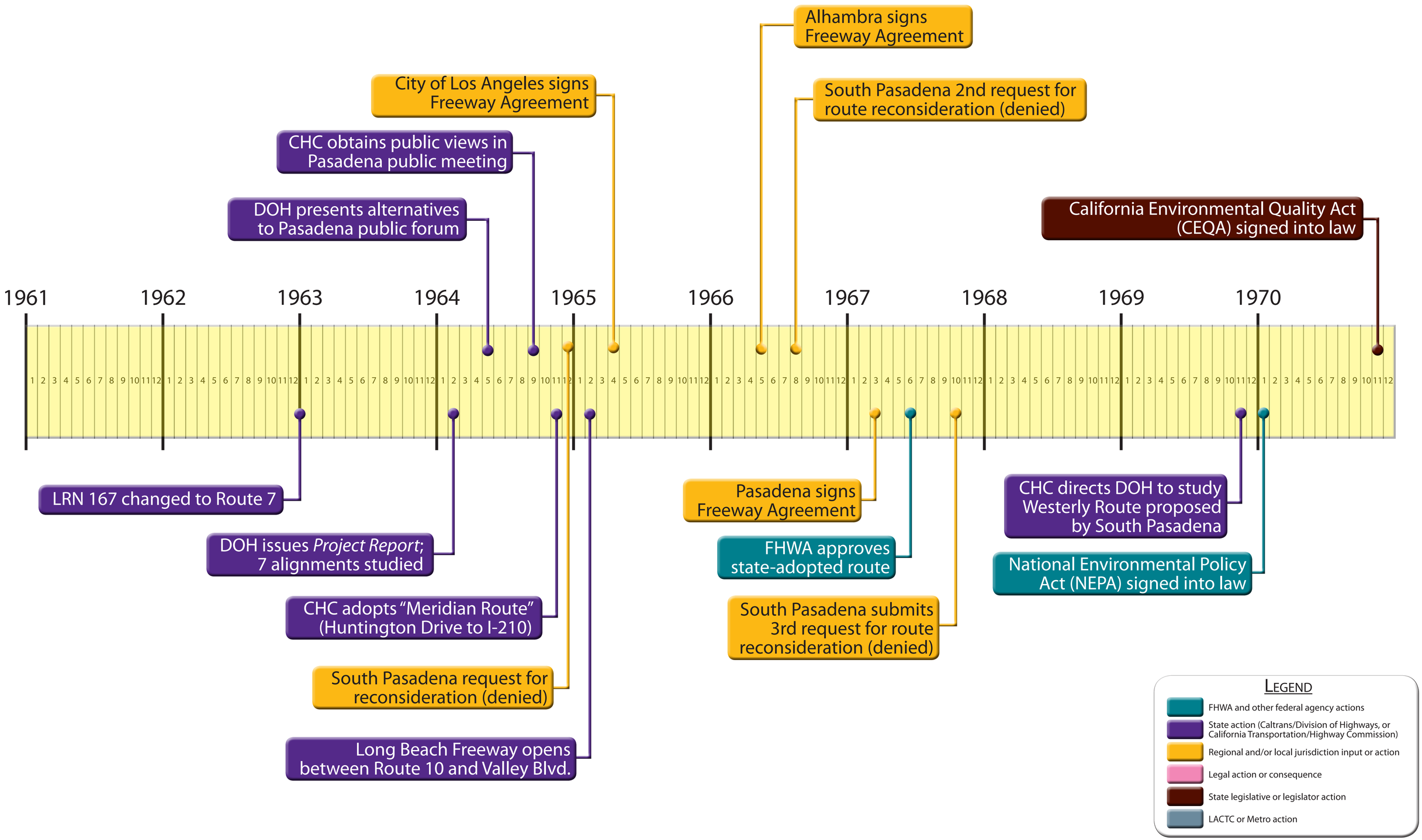
Appendix C – 710 Historical Log of Events (1930-2010)

SR 710 - Historical Log of Events (1930 - 1960)

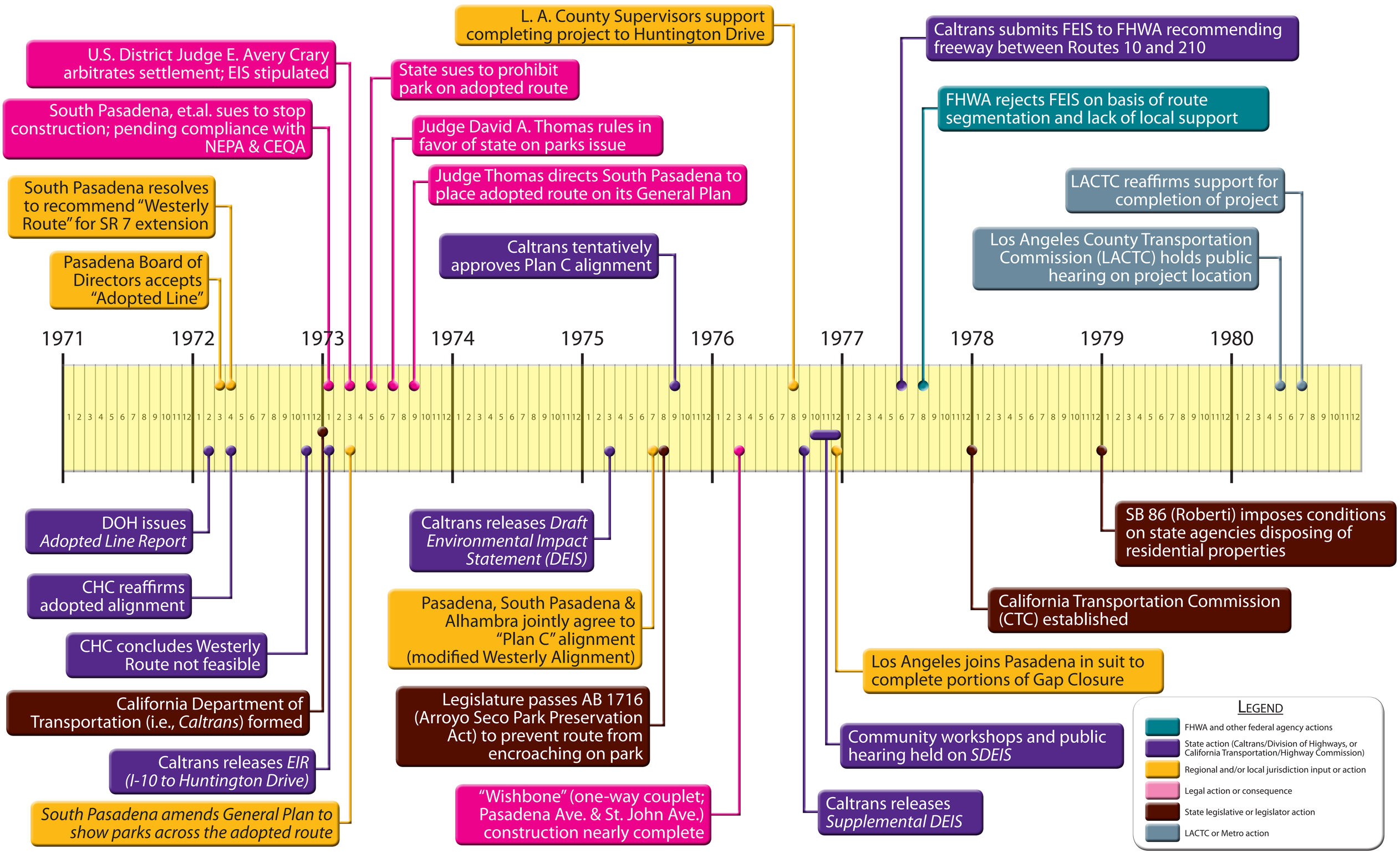




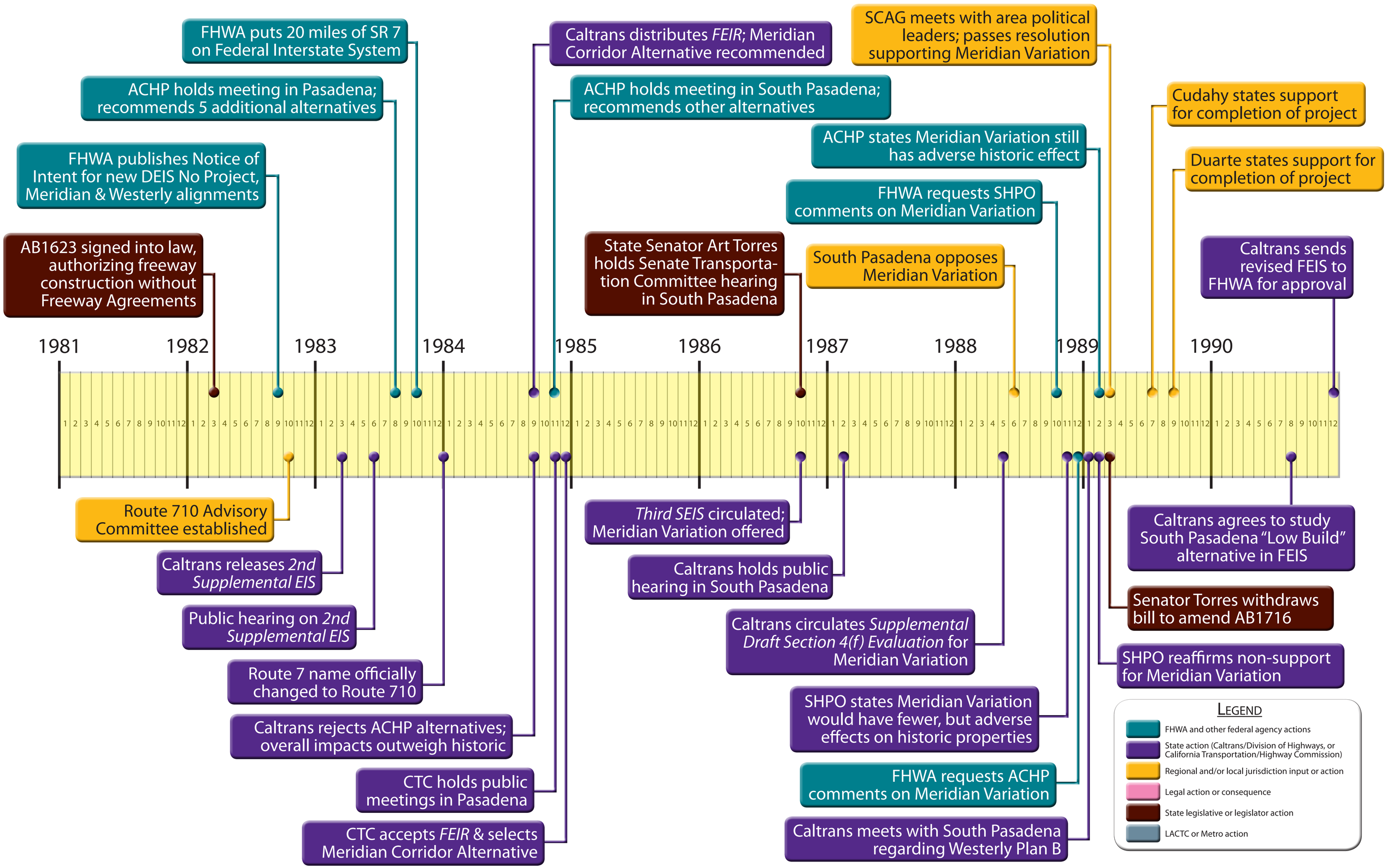
SR 710 - Historical Log of Events (1961 - 1970)



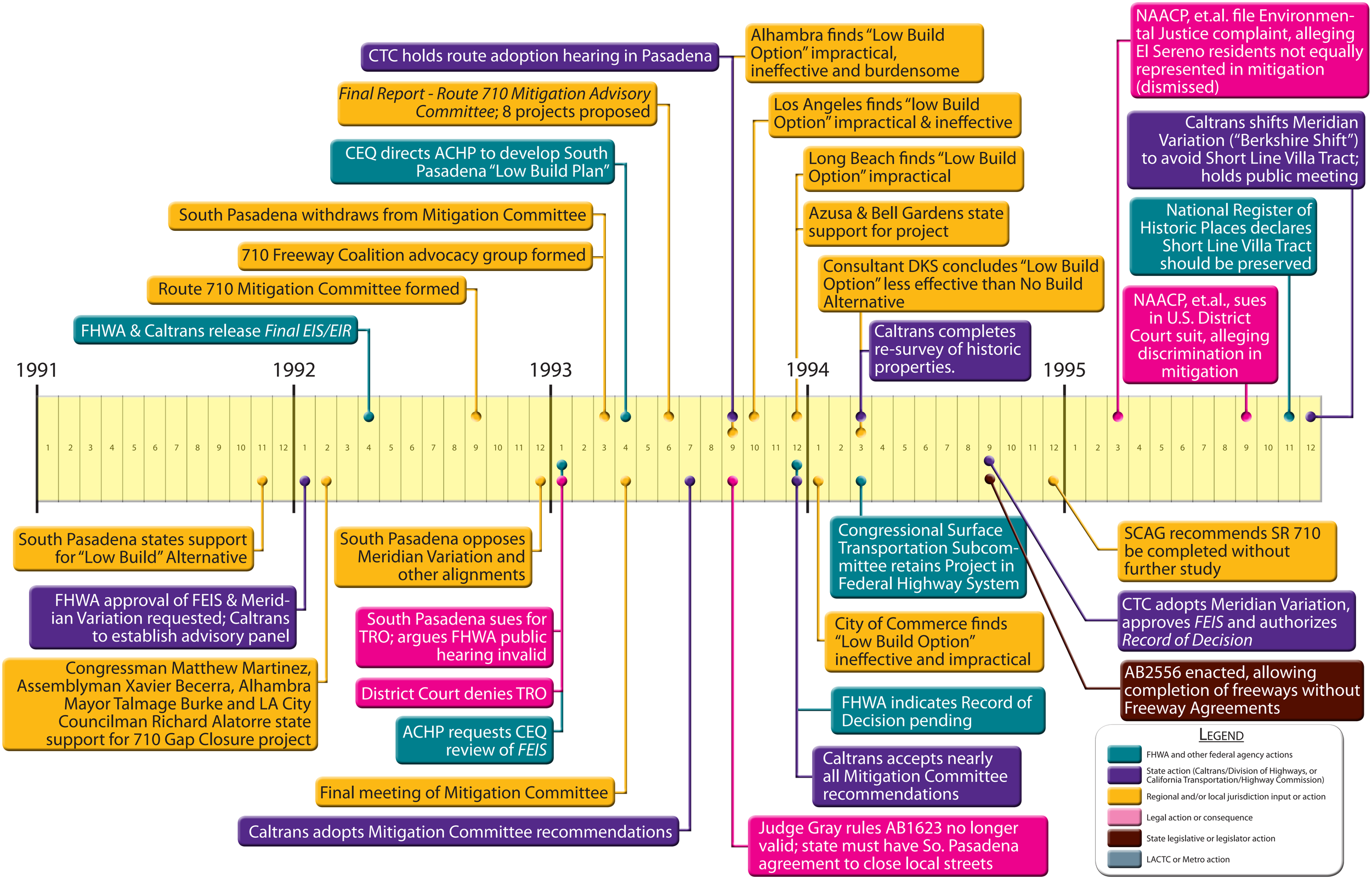
SR 710 - Historical Log of Events (1971 - 1980)



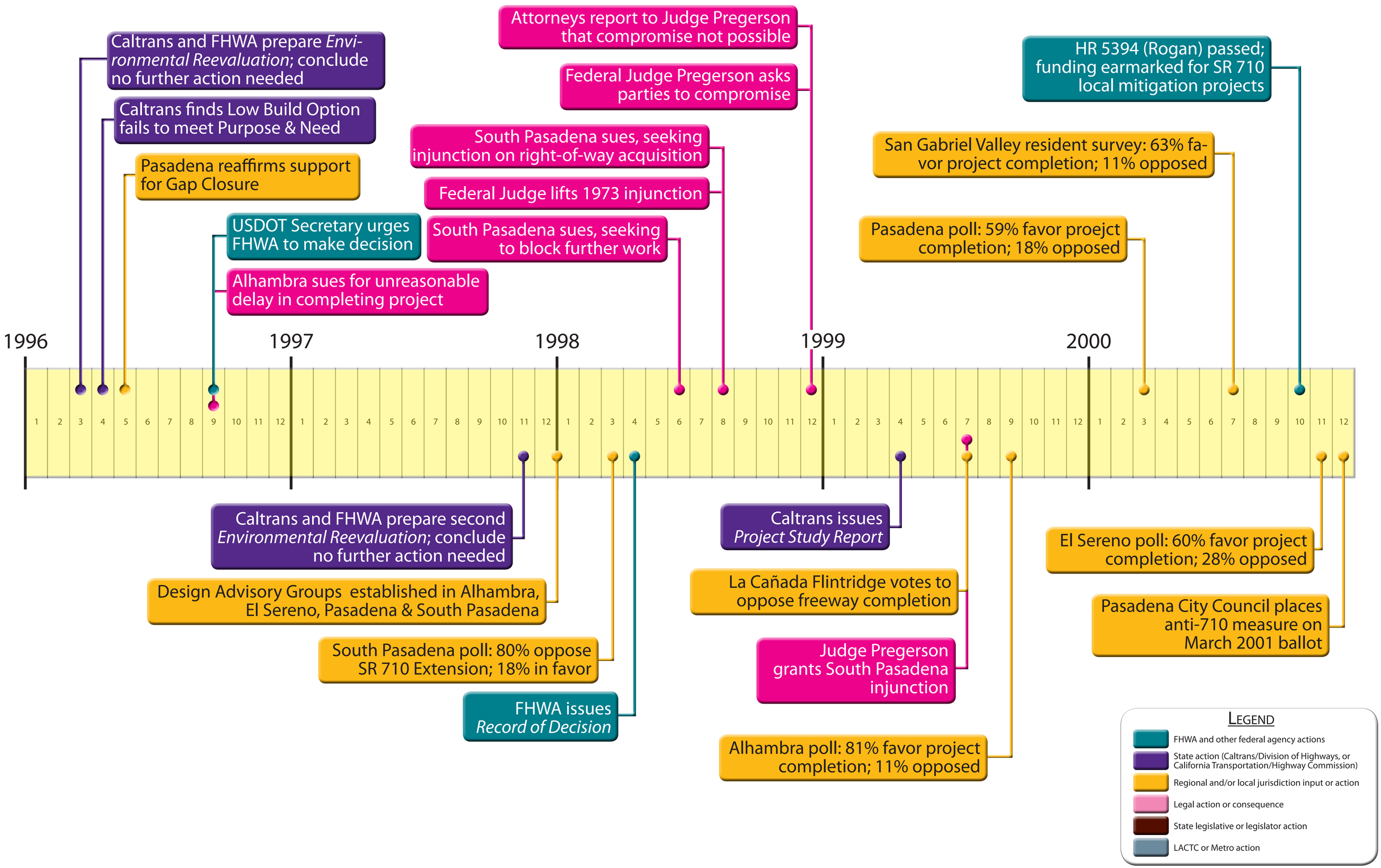
SR 710 - Historical Log of Events (1981 - 1990)



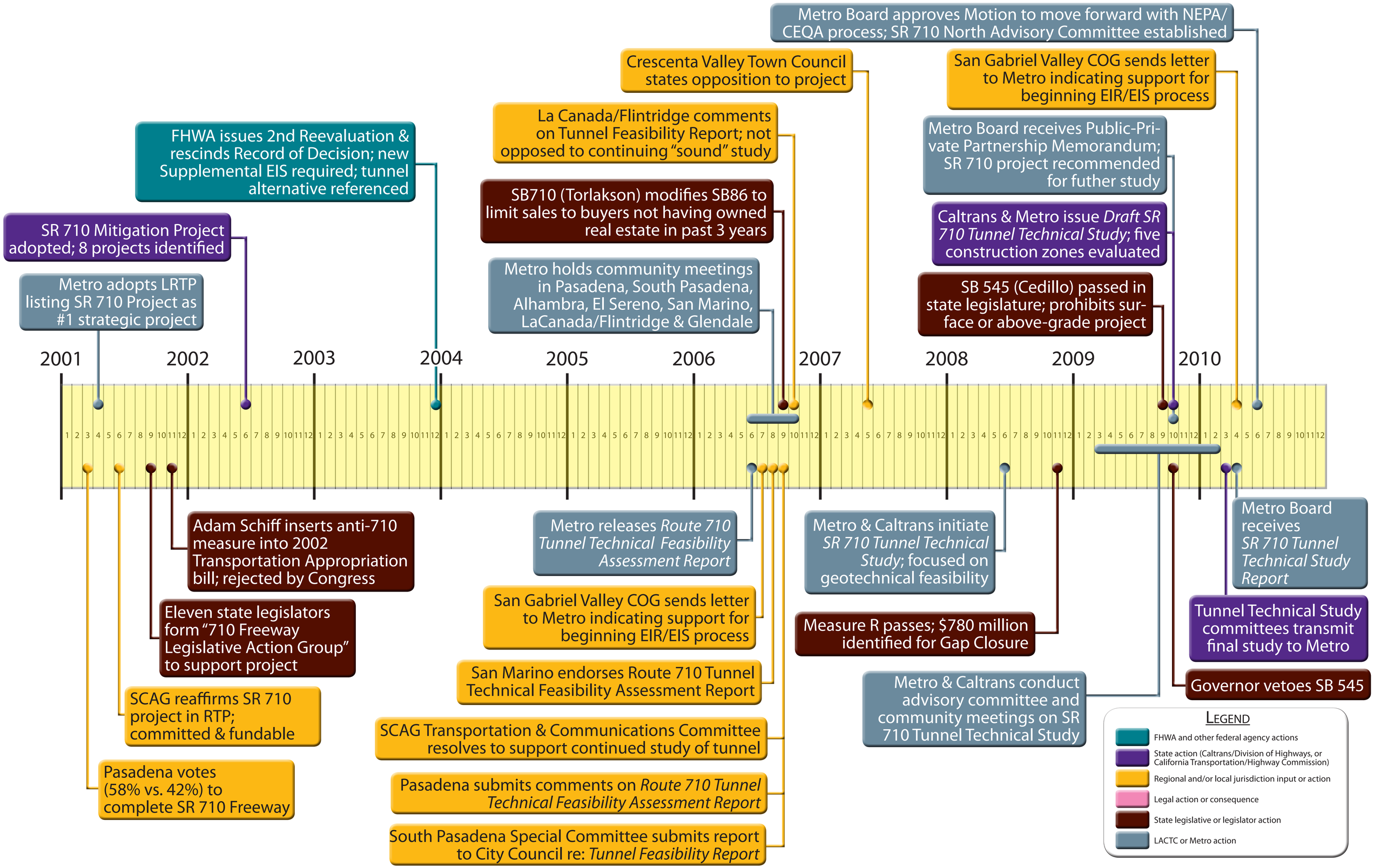
SR 710 - Historical Log of Events (1991 - 1995)



SR 710 - Historical Log of Events (1996 - 2000)



SR 710 - Historical Log of Events (2001 - 2010)



Appendix D – Formal Written Scoping Letters

D-1 – Elected Official/Agency Letters

CAPITOL OFFICE
STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0044
(916) 319-2044
FAX (916) 319-2144

DISTRICT OFFICE
215 N MARENGO AVENUE
SUITE 115
PASADENA, CA 91101
(626) 577-9944
FAX (626) 577-2868

Assembly
California Legislature

ANTHONY J. PORTANTINO
ASSEMBLYMEMBER, FORTY-FOURTH DISTRICT

COMMITTEES
CHAIR, REVENUE AND TAXATION
GOVERNMENTAL ORGANIZATION
HIGHER EDUCATION
HUMAN SERVICES
PUBLIC SAFETY
TRANSPORTATION

RECEIVED 4/14/11

April 13, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Re: Comments on Notice of Preparation and Scope of Environmental Impact Report/ Environmental Impact Statement
PM 26.7/32; State Clearinghouse No. 1982092310 - 710 Gap Closure

Dear Mr. Kosinski:

As the elected representative of the 44th Assembly District, I hereby submit my comments and expectations for the Notice of Preparation and scope of the proposed Environmental Impact Report and Environmental Impact Statement (EIR/EIS) for the 710 Gap Closure Project (710 Project).

To begin, I must convey my disappointment with the process as it has progressed to date. The outreach for the meetings leading up to scoping has been minimal and ineffective. Community members who have attended countless meetings on this topic, and for whom the California Department of Transportation (Caltrans) and the Metropolitan Transportation Authority (Metro) most certainly have contact information, were not notified to attend the SR 710 Conversations meetings. Impacted communities to the North and West of the proposed project area were left out of the education process and were only finally visited, at the insistence of local elected officials, during the final segment of the three part series that was offered to other communities.

The meetings themselves were poorly planned out, particularly the second in the series, which was advertised as an educational meeting on "Protecting Communities through an Environmental Process -CEQA/NEPA," in which very little information was originally planned to be shared. It was only through the outrage and insistence of my staff and local stakeholders that the meeting was redesigned to actually address community questions about the environmental process. Once again, rather than taking an opportunity to earn the public's trust, Caltrans and Metro have short-changed the community and spent considerable public funds for yet another round of ineffective, questionable meetings with limited public access to the information they seek.

It is imperative that Caltrans now step up to their responsibilities and include the issues that the impacted communities are asking to be studied in the EIR/EIS process. One of the critical factors that must be taken into consideration is the impact of project alternatives on the communities adjacent to the project study area. As a public policy consideration, we must strive

to resolve the challenges of mobility and air quality throughout our region, not simply to move the challenges around to impact different areas of the region. Therefore, all study of the impacts of project alternatives and project alternative construction must include consideration of the impact on the communities adjacent to the project study area, including but not limited to North East Los Angeles, Glendale, La Canada, La Crescenta-Montrose and Sunland–Tujunga.

As I have maintained for years, it is impossible to make informed public policy decisions in regards to a potential project without knowing the most basic facts, namely how much a project will cost and how much benefit that cost will buy us. In the past, a variety of cost estimates have been offered up for a potential tunnel option, but no serious study has been engaged in identifying a true cost for either a tunnel or any other alternatives. Credible cost analysis must be engaged for all project options in the early stages of the EIR/EIS. The focus of the project alternatives to be studied must certainly be impacted by the true financial feasibility of project options, which will be guided by a credible cost-benefit analysis.

Questions have been raised whether the SR-710 project rightfully falls under the exclusions listed for the Surface Transportation Project Delivery Pilot Program, disqualifying the EIS from the auspices of Caltrans and requiring Federal Highway Administration (FHWA) involvement. Because of the long history and previous involvement of FHWA, unbiased consideration must be granted to identify whether NEPA certification on this project rightfully reverts back to FHWA based on their long history with this project.

Additionally, I must agree with the City of La Canada Flintridge that because Caltrans has failed to adequately define the project and has instead described the possibility of "a tunnel, freeway, heavy rail, light rail, bus transit, or traffic management system, or a combination of these modes, <u>all of these alternative projects must be analyzed in full detail."</u> It is imperative that the study be comprehensive and that it addresses each and every alternative in complete detail. Throughout the SR 710 Conversations meetings and through a number of years working with stakeholders on this issue, it is clear that the community wants 21st Century solutions. The community insists that Caltrans fully consider greener, forward thinking solutions that work not only for our generation, but that will be an investment in the lives of our children, grandchildren and great grandchildren. It is also clear that this process has been mired in controversy through a continued cursory and inadequate approach to securing accurate information. Failure at this point to address these concerns will doom this project and forever tarnish any believe that Caltrans and MTA can be trusted with a project of this potential size and scope.

Southern California does not suffer from a lack of freeways or roads. Rather, our region suffers from an overabundance of and over reliance on automobiles. We need to identify effective solutions that assist in getting cars and trucks off of our roads, while enabling people and goods to move to where they are needed.

Several ventures that our region is already engaged in must be considered for expansion and to be expedited as methods of reaching our mobility and air quality improvement goals. Certainly the Alameda Corridor East/ACE Project and the Metro Gold Line Foothill and Eastside Extensions are consensus projects that have proven track records in our region, with plans and future potential for growth. In addition to plans for extending the Green Line to the Los Angeles

International Airport and the Gold Line Foothill Extension to the Ontario Airport, consideration should be given to constructing a light rail line through Glendale to the Bob Hope Airport in Burbank as well, connecting and providing effective alternative transportation into all three major airline hubs throughout the region. The Federal Highway Administration, in its letter dated December 17, 2003, admonished Caltrans to cease any movement forward with a project until the impacts of some of the above mentioned projects had been studied. FHWA questioned the need for a gap closure in light of mass transit expansion. This study should take those questions to heart and prove to the public that a project is even necessary to meet the demands of our population needs.

Intelligent combinations of the above suggestions along with local arterial traffic management systems, improved and expanded bus service, and heavy rail improvements for goods movement purposes must be considered. Cost effectiveness of the implementation of combined smaller projects, along with the positive impact of multiple small to mid-size projects on local hiring and job development, may very likely outweigh the attributes of one vast project that requires experience not found in local companies, with a significant requirement for importing expertise and workers.

The immense cost and risk of a tunnel or otherwise outmoded, outdated freeway alternative is truly an option of the past. We must be forward thinking in our innovation, and fiscally responsible to the people of the State of California. The public deserves a wise investment in the infrastructure of tomorrow. I call on Caltrans to put the future of our people ahead of the entrenched thinking of the past. Thank you for your consideration and I look forward to continuing this important work together.

Sincerely,

Anthony J. Portantino
Assemblymember, 44th District

AJP:jh

cc:

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0049
(916) 319-2049
FAX (916) 319-2149

DISTRICT OFFICE
205 S. CHAPEL AVENUE, SUITE B
ALHAMBRA, CA 91801
(626) 382-0049
FAX (626) 382-0048

assemblymember.eng@assembly.ca.gov
www.assembly.ca.gov/eng

Assembly
California Legislature

MIKE ENG
ASSEMBLYMEMBER, FORTY-NINTH DISTRICT

COMMITTEES
CHAIR, BANKING AND FINANCE
BUSINESS AND PROFESSIONS
EDUCATION
HEALTH
TRANSPORTATION

received
4/18/11

April 12, 2011

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

RE: Support for the 710N Gap Closure Project and Comments for Environmental Review

Dear Mr. Kosinski,

I am writing to express my support for the 710N Gap Closure Project and would appreciate it if you made this letter part of the official record. I strongly support the construction of a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed NOW.

Please include the following in the environmental analyses:

- The Gap has been in existence for nearly 40 years creating much confusion for drivers; let's fix this! The EIR should show how all the freeways and major roads in the area in four directions will benefit from the closing of the gap.

- Air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved; the EIR should demonstrate both of these aspects to show actual project benefits.

- Jobs will be created during these tough economic times; the EIR should detail how the project helps our economy in creating jobs and in other ways such as the benefit to the tourism industry; for example, visitors to Los Angeles will actually be able to reach their destination when using the 710N freeway instead of being routed off through local communities.

I urge you to continue the environmental process in an expeditious manner. It is important to remember that the voters of Los Angeles County voted overwhelmingly in favor of Measure "R," which calls for the 710N freeway to be completed.

We cannot wait another 40 years for this project to become a reality.

Thank you for your consideration and for adding this letter to the official record.

Sincerely,

Mike Eng

MIKE ENG
Assemblymember, 49th District

ME:mu

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April 14, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinki,

As you know, Caltrans recently issued a Notice of Preparation of a Draft Environmental Impact Report (DEIR) on the State Route 710 North Gap Closure Project and is accepting public comments on the Notice. I appreciate the opportunity to share my concerns and thoughts about the Notice with Caltrans.

First, the study area called for in the Notice for the DEIR is limited to the area bordered by "interstate 10 to the south, interstate 605 to the east, interstate 210 to the north and State Route 2 to the west." While any project that would be constructed would be within this area, obviously a project that would have such a large effect on the region's transportation system will have a substantial impact outside of the actual area of construction. I strongly urge Caltrans to broaden the study area in the DEIR and EIR to include communities close to the potential construction zone. These communities should include, but not be limited to, Altadena, Glendale, La Canada, La Crescenta and Montrose. This will allow for a full understanding on a region-wide basis of all impacts associated with any project in the construction area and will help the public and policy-makers make well informed decisions.

Second, it is critical that the DEIR and EIR must fairly consider all transportation modes and all of the five zones in the Final State Route 710 Tunnel Geotechnical Study. I was pleased to see that the Notice of the DEIR said the DEIR would consider: "surface and subsurface highway/freeway construction, heavy rail, and bus/light rail systems, local street upgrades, traffic management systems and a no build alternative," and that the potential construction area corresponds to the five zones in the geotechnical study. However, it is essential that the DEIR and EIR consider all transportation modes and all five zones throughout the entire process and avoid a problem that has plagued planners from the outset of this decades long debate -- beginning with a predetermined conclusion and working backwards. Such an approach has never been, and never will be credible. The premature elimination of any route or alternative would color the outcome of the study and never gain public support.

THIS STATIONERY PRINTED ON PAPER MADE OF RECYCLED FIBERS

Instead, it would result in the same level of community disagreement that Caltrans's 1992 EIS on the issue generated. The 1992 EIS considered a total of 24 alternatives, but 22 of them were minor variations to the traditional Meridian alignment of a surface completion of the freeway, and only the remaining two constituted a substantive alternative. The document failed to achieve any level of community consensus as many stakeholders felt that no alternative to freeway completion was seriously entertained. The goal here should be to arrive at a regional accord if possible on the transportation solution which best reduces congestion while maintaining the quality of life in our neighborhoods.

As I have stated many times, I still believe that an EIR is premature, without examining the cost of a tunnel and any viable cost-effective alternative. But as Metro and Caltrans have determined to press on nonetheless, it is essential that the DEIR and EIR must include an up-to-date and comprehensive cost benefit analysis of all potential solutions. As the cost of building the tunnel is considerably higher than first estimated (when proposed only a few years ago, it was suggested the tunnel could be completed at not much more than the at-grade proposal or for around $1.3 billion, and now it is many times that number), many other substantial transportation projects are now financially competitive. The tunnel may prove to be the best solution, and I continue to reserve judgment, but we owe it to the taxpayers and residents to consider any cost-effective solution to the region's traffic woes.

I appreciate your consideration of my thoughts on this important issue.

Sincerely,

Adam B. Schiff
Member of Congress

DEPARTMENT OF TRANSPORTATION

April 14, 2011

Via Email and US Mail

Ron Kosinsky, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 Main Street, MS 16A
Los Angeles, CA 90012

Re: Scoping Comments for Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the 710 Gap Closure Project

Dear Mr. Kosinski:

The City's of Pasadena's formal scoping comments for the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the 710 Gap Closure Project are provided on the attachment to this letter.

We appreciate the opportunity to participate in this process. If you have any questions or would like additional information, please contact me directly at 626-744-6450.

Sincerely,

F. C. Dock

Frederick C. Dock
Director of Transportation

c. Michael J. Beck, City Manager
Vince Bertoni, Director of Planning and Development
Jennifer Paige-Saeki, Senior Planner/CEQA Coordinator

enc. Attachment

221 East Walnut Street ◆ Suite 210 ◆ Pasadena, CA 91101
www.cityofpasadena.net/trans

ATTACHMENT

Process

a. The role of closing the 710 Gap in the context of improving regional mobility and accessibility in relation to the defined study area is extremely unclear. Without a more precise definition of what aspects of regional mobility and accessibility are to be improved, alternatives cannot be effectively developed or considered. To that end, the lead agency should document what aspects of regional mobility and accessibility are limited and to what extent is that due to the gap in the 710. Documentation should include, but not be limited to the following:

   - Analysis of freight flows on trucks with specifics about origin/destination that show how the gap on the 710 limits north-south or east-west goods movement
   - Analysis of regional commute travel by mode, with origin-destination studies that show how the gap on the 710 limits regional commute travel
   - Analysis of current users of the 710 Gap corridor (i.e., those exiting/entering the two stub ends of the 710) with origin-destination studies that show how these users would be affected by alternatives proposed for the corridor

   If the above analyses indicate that the aspect of regional mobility that is compromised is the segment of I-5 between I-710 and SR 134, then the study area should be redefined to include the areas proximate to possible alternatives to the I-5 corridor rather than focusing on the 710 Gap.

b. The EIR/EIS process should be structured so that the public is informed of findings at each milestone phase of the preparation of the EIR/EIS.

c. Because of the complexity of the 710 gap project, an exhibition center(s) should be established during the EIR/EIS review and comment period in addition to use of electronic media in order to facilitate public awareness of project components analyses, design features, activities, and so forth. Because of the magnitude of impacts associated with tunnel alternatives, such exhibit center(s) should be located in communities where the tunnel portals are proposed.

d. In order to facilitate public review and comment, EIR/EIS alternatives should be superimposed on aerial photographs showing the affected real estate. In addition, photorealistic visualization techniques should be used to provide images of the alternatives.

e. Regional agencies should assess the potential of freight-to-rail considerations to inform assumptions and networks in the traffic modeling process used for the EIR/EIS.

f. Regional agencies should provide detailed information on approved projects to improve truck activity on the regional network to inform the EIR/EIS process estimates of future truck volumes on the network in the defined study area.

g. Multi-modal and system management policies and related improvements should be incorporated in each EIR/EIS alternative under consideration since they influence capacity and mode share estimates. In particular multi-modal provisions should be defined as part of the proposed project's overall congestion management provisions.

h. For alternative(s) that include a tunnel, the multi-modal and system management aspects of the EIR/EIS should be comprehensive and specific in communities where portal locations are proposed. The multi-modal and system management aspects should address the City of Pasadena's adopted Mobility Element (part of the General Plan), which defines requirements that apply to specific streets throughout the community.

i. The EIR/EIS should define performance requirements that would be included in any Public Private Partnership implementation program.

j. The draft scoping document for the EIR/EIS should contain a glossary of terms so that all participants can be clear on the definition of terms.

Traffic analysis and impact assessment

a. Absent significant re-engineering and reconstruction of the 710/210/134 interchange, Pasadena will likely experience substantial increases of traffic on City surface streets caused by drivers seeking ways to get around the already congested interchange, especially during peak hours. The EIR/EIS should thoroughly investigate measures to mitigate the impacts on surface streets of traffic bypassing the interchange.

b. The EIR/EIS should fully analyze the changes in peak hour traffic on local streets in the vicinity of the proposed project. The EIR/EIS should prepare local area traffic modeling analyses for the following portions of the street system and use this information to define mitigation measures if necessary:

    - The EIR/EIS should analyze the impact on traffic conditions for major arterials in the City of Pasadena as well as the freeway network. Traffic volume issues will remain a concern throughout this study process and at a minimum, the analysis of traffic impacts on local streets should be fully analyzed and mitigation measures should be defined if necessary.

- The EIR/EIS should document the traffic impacts associated with the projected increase in traffic (both the number of cars and the percentage increase) on the 210 Freeway through northwest Pasadena and the 210 Freeway through East Pasadena and use this information to define mitigation measures if necessary.
- The EIR/EIS should document the traffic impacts associated with projected traffic expected to exit the freeway and travel on City streets in northwest Pasadena and East Pasadena and use this information to define mitigation measures if necessary.

c. To be consistent with regional plans, the EIR/EIS analysis should be based on the latest Southern California Association of Governments travel demand forecasting model and forecasts prepared for the most recent Regional Transportation Plan.

d. The EIR/EIS should report on technical findings and traffic impacts or benefits of an interchange at Huntington Drive and define traffic mitigation measures if necessary.

e. The EIR/EIS should include consideration of the closure of ramps leading to California Boulevard in Pasadena and identification of any alternate circulation routes or strategies.

Impact on Sensitive Uses

a. The EIR/EIS should fully analyze the impact on historical structures and sensitive land uses adjacent to alternatives such as schools, parks, and hospitals.

No-Build Alternative

a. The no-build alternative of the EIR/EIS should address the condition of the lands in the City of Pasadena that would be affected by not implementing the project and should include but not be limited to the following:

- Potential reversion of Pasadena Avenue and St John's Avenue to city streets
- Potential closure of the ramps to California Boulevard and identification of any potential alternate circulation routes or strategies
- Mitigation of the depressed portion of the freeway stub in Pasadena including installing a landscaped cap or deck over the depressed portion.
- Disposition of the residential properties and vacant property owned by Caltrans in the corridor

Alternatives That Involve Tunnels

a. The EIR/EIS should document case studies of similar tunnel projects around the world with an emphasis on a review of tunnel and highway construction projects in residential communities. Lessons learned from these types of programs should be

documented in the EIR/EIS and best practices should be incorporated into the project design and delivery.

b. The EIR/EIS transportation modeling analysis should incorporate relevant traffic studies of peak and non-peak hour traffic in the vicinity of the portals and if necessary develop mitigation measures.

c. The EIR/EIS should identify whether technology will be used to monitor the volume of traffic on the freeway and local street network and the composition of vehicle mix in the tunnel segment at any time.

d. The EIR/EIS should identify a limit on the amount of vehicles and the composition of the vehicle stream allowed in the tunnel at any time for safe operating conditions.

e. The EIR/EIS should define what traffic management and safety innovations are planned to minimize or eliminate congestion at tunnel toll collection locations, should toll collection be a part of an alternative.

f. The EIR/EIS should identify if vehicle identification tracking and cargo tracking technologies are being incorporated as part of the project. If truck cargos will be actively monitored using identification tracking and cargo tracking technologies the EIR/EIS should define how this would be done to minimize impeding the flow of traffic.

g. The EIR/EIS should investigate the feasibility of limiting or prohibiting truck traffic on 710, including but not limited to the following conditions:

- The EIR/EIS should analyze the feasibility of prohibiting trucks during peak commute periods from 6 a.m. to 9:30 a.m. and from 3:30 p.m. to 7 p.m.
- The EIR/EIS should analyze the feasibility of prohibiting trucks on the tunnel segment
- The EIR/EIS should analyze the feasibility of limiting the numbers of trucks using the tunnel at any one time
- The EIR/EIS should analyze the feasibility of limiting the length of vehicles or vehicle consists that use the tunnel

h. The EIR/EIS should analyze the feasibility and impacts or benefits of providing access ramps in between portals, including a full interchange at Huntington Drive.

Tunnel Portal Areas

a. The areas of tunnel entry, refuge, evacuation passages, and ventilation shafts are critical components of any tunnel alternative. Because these aspects are so important, the EIR/EIS should conduct a thorough analysis of proposed locations taking into account comprehensive design considerations. This review should

assess how the adjacent infrastructure, land use, or topography influences planning and design of the project, potential impacts on sensitive land uses, and define mitigation measures to address the impacts.

b. The EIR/EIS should document and provide aerial photographs with alignment alternatives superimposed. Potential tunnel portals, areas of refuge within the tunnel, evacuation passages and ventilation shafts should also be identified.

c. The EIR/EIS should document examples of Context Sensitive Portal Design as one of the most important design components of the overall project. We believe that there are opportunities to design the tunnel to include a portal design that is sensitive to its immediate environment and these issues should be addressed fully in the report and designs should be presented in public outreach meetings.

d. The EIR/EIS should include measures that could be incorporated into the design to mitigate impacts at the portals. Such components should be considered at the outset as a necessary element of the project, not treated as an afterthought at a later date.

e. As part of the portal mitigation review, consideration should be given in the EIR/EIS to the feasibility of installing a cap or deck over the depressed portion of the freeway to mitigate impacts at the I-710 stub portal site in Pasadena. Such considerations should be assessed during the design of alternatives in the event that particular tunnel engineering considerations are required.

f. The EIR/EIS should provide information on other tunnels in residential areas that have undertaken measures to include sensitive portal design features. Objectives are (1) to provide assurance that such measures can inform the design from the outset, even during preliminary stages, and (2) to ensure that design features are not precluded unintentionally due to late consideration.

g. The EIR/EIS should address whether technology will be installed at portal entries to screen for polluting vehicles and whether thermal detectors will be installed to identify unusual heat.

h. The EIR/EIS should address how over-height vehicles will be detected before they enter the tunnel.

Tunnel Ventilation

a. The EIR/EIS should document the general location of potential tunnel ventilation towers, their height, width, depth and the impact to any existing land uses where towers are proposed.

b. Any ventilation tower proposed as part of a tunnel option for the project will likely be out of scale with the residential structures along the route. The EIR/EIS should

investigate use of a minimum number of towers interspersed along the alignment in order to minimize disruption to surrounding neighborhoods.

c. The EIR/EIS should analyze the need for and frequency of ventilation towers should trucks be limited or not be allowed in the tunnel alternatives.

d. The EIR/EIS should document how the exhaust that is emitted from the potential future ventilation towers will be treated and the resulting air quality impact assessments.

e. The EIR/EIS should document potential advances in technology that are likely to occur during the next 10 to 20 years which might alter design and operation of a tunnel especially in relation to the need for ventilation towers.

f. The EIR/EIS should document comparisons with other national and international tunnels that include exhaust towers documenting lessons learned and drawing from best practices.

Noise

a. The EIR/EIS should document the projected increase in vehicle noise along sections of the 210 Freeway which do not have sound walls (northwest Pasadena and East Pasadena).

b. The EIR/EIS should analyze the need for sound walls which can be constructed as mitigation measures to address noise impacts as well as reduce visual impacts of construction.

Tolls and Related Technology

a. The EIR/EIS should thoroughly analyze the affects of any proposed tolls, whether they will be imposed on autos, trucks, or both, and an analysis of potential diversion of auto traffic or truck traffic to adjacent city of county arterials as a result of the toll charge. The analysis should also include an investigation of toll charges for all day versus only peak hours as well as incentive pricing for high occupancy vehicles.

b. The EIR/EIS should analyze and document an “Order of Magnitude Toll Revenue and Level of Bonding Estimate” for an alternative that would impose tolls only on trucks.

Visual Impacts

a. The EIR/EIS should include an assessment of the visual impacts of all related structures including the portals, ventilation shafts and other physical facilities related to the alternatives under consideration.

Landscaping

a. The EIR/EIS should document how mitigation measures such as landscaping and barriers could relieve many of the visual and noise impacts of the portal area from the surrounding residential and commercial areas. The cost of such mitigation measures and any sound walls should be included as part of the project.

Health Safety and Security

a. The EIR/EIS should include a review of the design, construction, and operation of comparable recently constructed tunnels in the United States and other countries and incorporate best practices in the areas of prevention, mitigation, response, and recovery from manmade and natural disasters.

b. The EIR/EIS should define the design standards that are incorporated to address vulnerabilities to natural and man-made disasters

c. If a performance based design is proposed, the EIR/EIS should define how issues such as life safety, acceptable risk, and fire safety are being addressed.

d. The EIR/EIS should incorporate a Health Risk Analysis of the impact of constructing and operating a tunnel to address the I-710 gap.

e. The EIR/EIS should address whether specialized technologies and standards for monitoring and inspecting structural elements of alternatives are incorporated into the alternatives.

f. The EIR/EIS should address the range of surveillance equipment proposed for the alternatives.

g. The EIR/EIS should address lighting provisions including transitioning lighting at the portals to aid driver vision and the use of in-pavement lighting for vehicle distance, lane definition and edge delineation that improve safety and prevent crashes.

h. The EIR/EIS should define incident detection and deterrent technology for incorporation into the alternatives including sensors for heat, water intrusion, fire, explosion, etc.

i. The EIR/EIS should address the feasibility of using cameras to identify vehicles that damage facilities for the purpose of collecting for damages.

j. The EIR/EIS should identify all measures to for safe evacuation in the event of an emergency including a sound support in addition to lighted guidance signs, refuge areas, and evacuation passages.

k. The EIR/EIS should define the role of law enforcement and laws/regulations to promote effective response and recovery operations. In this regard, the communication procedures, equipment, and jurisdictional issues among law enforcement emergency responders and operations control center should be defined.

l. The EIR/EIS should evaluate the state of the art for fire, rescue, emergency medical and hazardous materials response technology and best practices for any alternative considered, especially if a tunnel alternative is considered. The EIR/EIS should address jurisdictional issues that may occur due to access limitations. The EIR/EIS should address training, procedures and equipment needed for the jurisdictions directly impacted *and their mutual aid departments and partners.* The evaluation of all equipment and procedures, with particular attention to communications technologies, should prioritize technologies and procedures that "future-proof" the recommended alternatives."

m. The EIR/EIS should evaluate the potential impact of limiting hazardous cargo within the project area. The EIR/EIS should also evaluate the state of the art for monitoring hazardous cargo within the project area to either support a limit, or to rapidly and automatically detect hazardous releases or other situations involving hazardous cargo."

Identify Utility Infrastructure Impacts

a. The EIR should identify any utility infrastructure (e.g., electrical generation, distribution and sub-transmission systems, water and sewer mains, pumping facilities, fiber optic lines, communications infrastructure, etc.) affected by the project."

b. "Pasadena Water and Power should be consulted, provided access to specific project information, and have input into the design process to minimize or mitigate impacts."

Construction Impacts

a. Construction impacts should be fully defined and should include identification of potential utility infrastructure displacement or access issues (e.g., ingress/egress from local power plant, substations, wells, etc) during construction.

b. Measures to minimize construction impacts should be addressed in the EIR/EIS. Mitigation measures to screen visual and noise impacts should be implemented prior to construction and provisions to manage air borne dust due to excavation and/or construction should be included.

c. The EIR/EIS should thoroughly investigate the visual and noise impacts throughout both the construction and operations phase of the project. Furthermore the EIR/EIS

should investigate how Craftsman design vernacular could be incorporated into walls that would screen residential neighborhoods in Pasadena from the freeway.

d. The EIR/EIS should analyze the vibration impacts during construction. The EIR/EIS should document the considerable construction impacts related to the drilling and boring equipment used to construct tunnels proposed for this project.

e. The EIR/EIS should document the construction impacts as a result of the lengthy period of time the portal area(s) will be used for staging of construction equipment and for hauling of excavated material.

f. The EIR/EIS should define staging areas and construction truck routes for hauling of excavated material and delivery of materials.

g. The EIR/EIS should define and document the total construction schedule for the project.

h. The EIR/EIS should thoroughly evaluate the potential for contaminated soil to be encountered within the project and the potential hazards related to the management thereof, especially if a tunnel alternative is considered.

i. The EIR/EIS should evaluate the state of the art for fire, rescue, emergency medical and hazardous materials response technology and best practices for the construction of any alternative considered, especially if a tunnel alternative is considered.

j. The EIR/EIS should address jurisdictional issues that may occur due to access limitations. The EIR/EIS should address training, procedures and equipment needed for the jurisdictions directly impacted and their mutual aid departments and partners.

Maintenance

a. The EIR/EIS should address provisions and schedules for tunnel inspection and how maintenance and/or rehabilitation of project elements will be conducted under full closure and partial closure conditions.

Project Cost and Financing

a. The EIR/EIS should analyze financial projections about the cost revenues available for the tunnel and identify whether innovations have been identified to promote service life and reduce operating costs.

b. The EIR/EIS should document any legislative efforts that the State of California, the Southern California Association of Governments, and the Los Angeles Metropolitan

Transportation Authority may undertake regarding the sale of related right-of-way property and the potential for applying any of the proceeds to the Route 710 project.

c. The EIR/EIS should document a cost/benefit analysis for the best alternative that will balance the need for traffic flow and mobility with cost effectiveness. It must also balance the environmental impacts to local communities.

d. The EIR/EIS should document the operating and maintenance costs associated with any alternative and define for each alternative the business plan for the upgrade or replacement of the equipment and information devices that are part of the project.

e. All mitigation included in the final EIR/EIS should be incorporated into the provisions for any Public Private Partnership developed for the project and the City of Pasadena should be allowed to review the provisions of any such partnership agreement prior to its execution.

f. The EIR should identify any utility infrastructure affected by the project and associated costs to relocate, replace, or repair. Pasadena's electrical distribution and sub-transmission systems may be affected by the construction of this project. To keep the City-owned utility whole throughout the project, Pasadena Water and Power needs to have access to specific project information and have input into the design process; that will ensure that adverse impacts are avoided, and that possible parallel projects or collocations are evaluated for potential cost savings that could accrue to either or both entities.

CITY OF SOUTH PASADENA
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April 13, 2011

Via Email & U.S. Mail

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

RE: Comments on Notice of Preparation and Scoping Comments on PM 26.7/32 (So Called "Gap Closure" Project)

Dear Mr. Kosinski:

Thank you for the opportunity to comment upon the Scope of the Proposed Environmental Impact Report (EIR) and Environmental Impact Statement (EIS) (jointly referred to as "EIR/EIS") on what you refer to as the "710 Gap Closure." South Pasadena has been involved in this issue for decades. Initially, the primary concern was on the devastating impacts a proposed surface route would have on South Pasadena and the surrounding communities. Now an important concern is that limited resources be expended in a way that most cost-effectively increases mobility in the region.

In preparing this letter, the City has had assistance from its special counsel and two sets of transportation experts, Jeffrey Tumlin and Colin Burgett of Nelson\Nygaard Consulting Associates, Inc., and Norm Marshall of Smart Mobility. The resumes of the transportation experts are attached as Attachments A and B.

I. SUMMARY OF POSITION.

First, we begin by pointing out that there is not a "gap" to be closed. The line drawn on a map by transportation planners in the 1950's was not set in stone. Things have changed. This is not unusual. Many highways once on the drawing board have been abandoned as governmental agencies wisely decide to divert resources to transit and non-highway transportation investments. South Pasadena continues to believe funding for multi-modal options should be done with the funds designated in Measure R (tunnel).

Second, South Pasadena hopes the fifty plus year stalemate can be ended by Caltrans and Metro showing affected jurisdictions they are willing to take a fresh look at how increased mobility in the San Gabriel Valley can best be achieved. That process must start with a cooperative effort to develop and fully vet a multi-modal alternative to another massive highway, whether freeway or toll-way.

Third, regardless of what alternative eventually becomes the "preferred alternative" for purposes of environmental review, the surface route should removed as an option at the end of the scoping process, both because it is not feasible under section 4(f) of the Federal Transportation Act and because it would have the greatest environmental impacts of any alternative, and thus does not have to be considered as a method of reducing impacts.

Finally, the process that has commenced is so flawed that it should be recommenced after a multi-mode alternative is developed and a cost-benefit analysis is conducted between the multi-mode alternative and a proposed tunnel to determine which project should be the preferred project for purposes of environmental review. No full EIR/EIS on the so-called "gap closure" has been prepared and circulated to the public since the late 1980's.

II. PRELIMINARY QUESTIONS.

A. The Notice of Preparation (NOP) filed on March 2, 2011 with the State Clearing House (SCH) is listed under State Clearing House number 1982092310. This is the same number that was first used on September 10, 1982, and was four times described as construction of a freeway-transitway in the cities of Alhambra, Los Angeles, South Pasadena and Pasadena. In light of the NOP's assertion that no decision has been made about what kind of a mobility project will be built, how can this be given the same project number as the prior project?

B. Does the use of the same SCH number mean that Caltrans plans to utilize any of the old EIR/EIS, first released in 1983?

C. The Notice of Scoping letter and the cover letter to the Notice of Preparation (NOP) itself refer to the I-710, while the NOP itself refers to State Route 710. Which is it?

D. South Pasadena received a letter addressed to responsible, trustee and federal agencies interested in the 710 "Gap Closure Project." What role does Caltrans believe South Pasadena plays?

E. Why is federal approval required? The notice refers to this project as involving the State Route 710, rather than being part of the I-710. Do you anticipate applying for federal funding, and if so, how much?

III. THE NOTICE OF PREPARATION IS INADEQUATE.

CEQA requires a Notice of Preparation to include a description of the project, the location of the project, and the probable environmental effects of the project. (CEQA Guidelines, § 15082.) The Notice of Preparation attached to Caltrans' February 28, 2011 letter to Responsible and Trustee agencies fails woefully to provide this information. Rather than describing a specific project, the Notice of Preparation claims the project may include, but not be limited to, a tunnel, heavy or light rail, local street improvements, and traffic management. This unusual Notice of Preparation may well be part of an effort to not appear committed to the tunnel in light of the litigation by the City of South Pasadena regarding the Metro's decision to include funding for the tunnel in Measure R before conducting environmental review of that tunnel. The Court of Appeal, in a decision issued on March 22, 2011, accepted the premise that Metro is not committed to the tunnel project. South Pasadena deeply hopes that is the case, though a July 8, 2010 draft report entitled "Public-Private Partnership Program" prepared for Metro makes it very clear that at least at that time, Metro's management's intent remained construction of a tunnel. That report discussed the way in which the benefit of "'burying" over a hundred thousand vehicles a day and removing them from the streets of Pasadena has the potential for 'trumping" the concerns of the communities to the north and thus restoring political feasibility to the gap closure."

While South Pasadena is delighted if Metro and Caltrans really is approaching the objective of improving mobility in the region by developing a multi-modal alternative, it notes the cover letter also says "an underground highway tunnel is under consideration for closing the 710 gap. This 'gap closure' may involve one of five possible route alignments." Though the word "may" is used, the insertion of these two sentences in the cover letter is some evidence the tunnel is still the real project under consideration, a conclusion that is supported by the statement of many Metro Board members at various public meetings.

South Pasadena also is concerned that the Notice of Preparation includes only a very general statement of the purpose of the project, but the Metro website now adds a far more detailed statement, which includes "Provide additional connectivity in the regional network for use by public transit." Such a purpose was included in prior EIR/EIS's and is appropriate, but should have been included in the Notice of Preparation, especially because the construction of an HOV/busway as was included in earlier environmental documents will increase the impacts that must be considered.

Assuming Caltrans and Metro are willing to proceed with an open mind about what is the best approach, a multi-modal alternative should be developed cooperatively with affected jurisdictions and the transportation agencies *before* environmental review. An EIR, like the Notice of Preparation, must contain a detailed statement of all significant effects on the environment *of the proposed project*. (Pub. Resources Code § 21100.) The Notice of Completion of an EIR is required to include "[a] brief description of the project." (Guidelines § 15085.) The courts have stated that: "An accurate, stable and finite project description is the

sine qua non of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-93.) "The defined project *and not some different project* must be the EIR's bona fide subject." (*M.M. Homeowners v. San Buenaventura City* (1985) 165 Cal.App.3d 357, 365, emphasis added.)

Only after a preliminary comparative analysis of the costs and benefits of a mutually acceptable multi-modal alternative to an approximately 4.5 mile tunnel should a decision be made about the preferred project that will be the subject of an EIR (and necessarily be described in the Notice of Preparation).

Further, the NOP and Scoping letter provide too little information regarding the potential impacts of any "Gap Closure Project" to allow for adequate public participation in the scoping process. Typically, lead agencies include an initial study with the NOP to provide responsible agencies and the public with a short description of the ways in which the project could potentially adversely affect the environment. Although the CEQA Guidelines do not specifically require the lead agency to circulate an initial study with the NOP, most public agencies do so as a matter of course in order to provide fuller information to the public. The California Supreme Court has found that members of the public hold a "privileged position... in the CEQA process ... based on a belief that citizens can make important contributions to environmental protection and on notions of democratic decision-making...." (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936, 727 P.2d 1029, 1033.) CEQA requires the NOP to include sufficient information describing the potential environmental effects of the project to enable responsible agencies to make a meaningful response. (CEQA Guidelines § 15082(a)(2).) The NOP claims that "the potential environmental effects are contained in the attached materials." However, the only information attached to the NOP provided to the City of South Pasadena is a location map.

Additionally, while Caltrans and Metro appear to have tried hard to enlist the public in its "710 Conversations" outreach program about the "Gap Closure," the NOP and NOI information on Caltrans and Metro websites is inconsistent and incomplete. Metro's "scoping page" (located at http://www.metro.net/projects/sr-710-conversations/sr710-scoping/) originally contained what was purportedly a link to the NOP, however, clicking on this link sent members of the public to the State Clearinghouse website. Not only does the State Clearinghouse website fail to provide the actual Notice of Preparation or any of the attachments, but it originally listed the end date of review as April 1, 2011 when it is actually April 14, 2011. If the agencies intend to carry out the open public discourse proposed in Metro's "710 Conversations" documentation, they should consistently and accurately post the CEQA and NEPA notices. At the very least, the agencies should have ensured that the State Clearinghouse was given accurate information about the comment period, or corrected this information, as was properly done when Caltrans updated the lead agency designation.

Finally, the map attached to the NOP is ostensibly of the San Gabriel Valley cities which include all of the San Gabriel Valley and portions of other service areas. However, the map that

is attached to the scoping notice includes the same geographic area but focuses on five zones for the possible tunnel, painting a very different picture of where the project and what type of project I s under consideration.

The NOP thus fails to so include any meaningful information about the proposed project or its possible impacts. Instead of providing the public and responsible agencies with sufficient information regarding the project and its potential impacts of the Project, the scoping process and NOP thwart CEQA's public participation objective.

IV. THE SURFACE ROUTE SHOULD BE DELETED FROM CONSIDERATION IN THE EIR/EIS.

A. The Impacts of a Surface Route Are Unacceptably High.

Periodically since 1953, and most recently in 1998, state transportation agencies have proposed a surface freeway as a form of what Caltrans and Metro now refer to as the "710 Gap Closure." The contentious history of the proposed freeway is summarized in the City of South Pasadena's Petition for Writ of Mandate, paragraphs 18-35, filed in connection with Metro's approval of Measure R funding for the tunnel. The relevant portions of the Petition are attached. (See Attachment C.) The surface freeway is quite literally the product of a 1950's mindset and approach to meeting the region's transportation needs. The surface route would sever the City of South Pasadena into four isolated communities, and have enormous impacts on the community, introducing a source of blight into a stable residential community and destroying close to 1000 homes, many of those historic. The Advisory Council on Historic Preservation stated that the 710 surface freeway is one of the single most harmful projects on historic resources proposed in the history of the organization. (See Attachments D and E.) The surface freeway would also have potentially severe air quality impacts, and may be inconsistent with the requirements of the Clean Air Act. (See Attachment F.) The most recent iteration of the proposed 710 surface freeway led to a 1999 federal injunction that is still in place. (See *City of South Pasadena v. Slater* (C.D. Cal. 1999) 56 Fed. Supp.2d 1106.) Part of the reason that injunction is in place are the comments of three separate federal agencies, including the Environmental Protection Agency and Department of the Interior, severely criticizing the environmental impacts of the surface route.

South Pasadena further believes, and the preliminary injunction supports the conclusion that, a surface route could not be approved by the Secretary of Transportation under section 4(f) of the Federal Transportation Act because there are feasible alternatives that would avoid the impact on historic homes. (49 U.S.C. § 303 (1994).) As Judge Pregerson stated, Section 4(f) is "a plain and explicit bar to the use of federal funds for construction of highways [which use Section 4(f) resources]-only the most unusual situations are exempted." (*City of South Pasadena v. Slater, supra,* 56 Fed. Supp.2d at 1113.) Indeed, Metro and Caltrans proposed the tunnel to avoid these impacts. South Pasadena and other cities that would be impacted by a project such

as a tunnel believe a multi-mode system is a better, less traffic inducing project than a surface route or a tunnel.

B. Deletion of the Surface Route as Part of the Scoping Process is Well Within the Discretion of Caltrans and Metro.

1. Only Alternatives that Would Reduce the Adverse Impacts of the Proposed Project Need Be Included in the EIR/EIS.

The alternatives analysis is "the core of the EIR." (*In re Bay Delta, supra*, 43 Cal. 4th at 1162.) An EIR must include a reasonable range of alternatives "that could feasibly attain most of the basic objectives of the project *while avoiding or substantially lessening any of the significant effects of the project.*" (Guidelines §15126.6(f), emphasis added.)

This requirement is also known as the "rule of reason." (*Ibid.*) "An EIR need not consider every conceivable alternative to a project." (Guidelines §15126.6(a).) No one factor establishes a fixed limit on what constitutes a reasonable range of alternatives. "Each case must be evaluated on its own facts, which in turn must be reviewed in light of the statutory purpose." (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 566.) CEQA's core statutory purpose is to *avoid* adverse impacts, and a surface route "gap closure" project would cause the greatest adverse impacts. Omitting evaluation of a surface freeway with even greater impacts than a subsurface freeway is consistent with CEQA's statutory purpose.

2. The Reasonableness of Project Alternatives is Measured by the Project Objectives under CEQA and the Purposes and Needs for the Project Under NEPA.

CEQA requires the EIR to contain a "statement of the objectives sought by the project." (14 Cal. Code Regs. [hereafter "Guidelines"] §15124(b).) "The statement of objectives should include the underlying purpose of the project." (*Ibid.*) The statement of objectives is required in order to assist the Lead Agency develop a reasonable range of alternatives to the proposed Project that may potentially *reduce* the adverse impacts of the proposed project. (Guidelines §15126.6(f).) Since a surface route would have dramatic negative impacts that the tunnel or a multi-mode alternative would not have, it is not required to be analyzed as an alternative.

A properly formulated statement of objectives is thus a means to an end, rather than an end in itself. The ability to challenge an agency's use of particular project objectives to either expand or restrict the alternatives considered in an EIR is necessarily closely tied to whether the EIR includes a reasonable range of alternatives. If the EIR otherwise includes a reasonable range of alternatives, challenges based on the narrowness or breadth of project objectives will fail. While "a lead agency may not give a project's purpose an artificially narrow definition" and thereby circumscribe the alternatives analysis (*In re Bay Delta Prog. Environmental Impact Report Coord. Proceedings* (2008) 43 Cal. 4th 1143, 1166), if the alternatives analysis includes

"enough of a variation to allow informed decision-making" it will withstand judicial scrutiny. (*Mann v. Comm. Redev. Agency* (1991) 233 Cal. App. 3d 1143, 1151.) In assessing whether an EIR contains a reasonable range of alternatives, the reviewing court will determine whether "the range of alternatives is unreasonable in the absence of the omitted alternative." (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal. App. 4th 957, 991.) A surface route would take or use historic resources because the aesthetic impact on historic resources constitutes a "use" of those resources. Thus, a surface route cannot be approved by the Secretary of Transportation if there is a feasible alternative. Therefore, there is no reason the surface route should be included, and every reason why it should be excluded at the end of the scoping process.

3. Relevant CEQA Cases Involving Project Objectives Support the Right of Caltrans and Metro to Reject the Surface Route from Further Consideration.

Several Court of Appeal decisions place significant limits on the ability of an applicant's project objectives to dictate to a Lead Agency what constitutes a feasible alternative to a proposed project. (See *Preservation Action Council v City of San Jose* (2006) 141 Cal App 4th 1336, 1351-2; *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal. App. 4th 587, 595 fn.4; and *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal. App. 4th 1437, 1460.) However, all of these cases involved private project applicants seeking approvals from an agency, and are thus distinguishable from the 710 case on that basis.

Several published CEQA cases support the conclusion that the lead agency has discretion to formulate project objectives, and to reject alternatives that are inconsistent with project objectives. Most recently, in *Jones v. Regents of the University of California* (2010) 183 Cal. App. 4th 818, 826, the Court upheld an EIR that rejected an off-site alternative because it was inconsistent with the project objective of promoting a campus-like setting for the proposed facility. In *Sequoyah Hills Homeowners Association v. City of Oakland* (1991) 23 Cal. App. 4th 704, 715, the Court upheld an EIR that rejected a lower density housing development as inconsistent with the project objective of providing "the least expensive single-family housing for the vicinity." In *Sierra Club v. County of Napa* (2004) 121 Cal. App. 4th 1490, the Court upheld agency reliance on a private applicant's objectives to narrow the scope of the alternatives analysis and ultimately to reject reduced build alternatives as infeasible because of inconsistency with the project objectives. And in *Association of Irritated residents v. County of Madera* (2003) 107 Cal. App. 4th 1383, 1399-1400, the Court upheld an EIR that had rejected a reduced size alternative because it would not meet the economic objectives of the project applicant.

Similar to CEQA's statement of objectives, the National Environmental Policy Act (NEPA) contains the requirement for a statement of "purpose and need" for the project. (40 CFR 1505.1(e).) The "purpose and need" discussion is meant to guide the analysis of what constitutes a reasonable range of alternatives to the project. While NEPA requires that "all reasonable alternatives" to a project be analyzed, "[w]hat constitutes a reasonable range of alternatives

depends on the nature of the proposal and the facts in each case." (CEQA Discussion of NEPA Regulations, 46 Fed. Reg. 18026, Para. 1B.) For the reasons discussed in this letter, the facts in this case argue strongly against inclusion of a surface freeway as a "reasonable alternative" for the 710 project. For that reason, federal and state agencies would be entirely justified in crafting a statement of Purpose and Need that includes the need to avoid the severe impacts and massive community disruption of a surface freeway. Deleting a surface freeway from detailed consideration in an EIS, particularly after the host community requested such a deletion on the basis of environmental concerns, is not an instance where an agency would be giving an unreasonably narrow definition to the project purpose and need. Rather, it would be respecting the need of South Pasadena and the other communities affected by the project to avoid the impacts of a surface freeway.

4. The Facts of the 710 Tunnel Project History Support Deletion of the Freeway from the Alternatives Analysis.

Since in any potential challenge to the adequacy of the EIR/EIS for the 710 Tunnel, a reviewing court could be called upon to determine the reasonableness of the project objectives and alternatives analysis, the rather lengthy and contentious history of the surface freeway would be relevant if someone challenges the exclusion of the surface freeway from further analysis in the EIR/EIS. Since the surface freeway has been previously studied and found to have significant negative impacts (albeit in an EIR/EIS that was found deficient), that prior history supports a decision now to forego analysis of a surface freeway in the current iteration of the 710 project. Also, a leading CEQA treatise supports the conclusion that courts are more lenient on lead agency decisions restricting an alternatives analysis when the motivation for narrowing the alternatives analysis is to reduce or prevent environmental damage. (Remy Thomas Guide to CEQA, 11th Ed., p. 567.) In situations such as here when a narrow articulation of project alternatives can serve CEQA's purposes, "there may be little or no practical benefit in concocting numerous alternatives solely for the sake of trying to reach some elusive magic number that constitutes a 'reasonable range.'" (Id.)

Since there seems to be no political interest among Metro's Board in pursuing a surface route, and since including the surface route in the EIR/EIS on the tunnel would require a tremendous amount expenditure of resources by Metro, Caltrans, and the City of South Pasadena, it also makes economic sense to exclude the surface route at the end of the scoping process. Deleting the surface freeway now could also help to make the environmental review more focused and efficient. Part of the reason the injunction was issued concerned the lack of proper analysis of impacts from a surface route on historic resources and air quality. Eliminating the surface route now would obviate the need for a detailed analysis of its impacts, greatly streamlining the review process, saving transportation agencies the expense and time of conducting detailed modeling for a project alternative that is not a "reasonable" alternative anyway, and focusing the review on the issues that matter, such as alternatives to freeway infrastructure, and analysis of impacts from a tunnel, if one is proposed.

The December 17, 2003 letter from the Federal Highway Administration (FWHA) details the additional analysis that would be required for the surface route to be included in the EIR/EIS. The impact of implementation of any of the eleven interim transportation improvements identified in the 1998 Record of Decision would have to be evaluated. The lack of progress in implementing these measures was one of the several reasons the FHWA withdrew the 1998 ROD in 2003.

South Pasadena strongly urges that the interim measures recommended by the design review committees be implemented *prior* to commencing environmental review for the tunnel or even a comprehensive multi-modal alternative. Implementation of the interim measures might greatly increase mobility in the 710 corridor and show that the Measure R and other limited governmental funds may better be expended elsewhere in order to enhance regional mobility. One example of such a measure is the "Proposed Valley Blvd./ Alhambra Connector," a project designed to increase access to the 710 freeway in El Sereno and Alhambra.

In 2005, the Los Angeles Department of Transportation (LADOT) produced a video that shows how a "Proposed Valley Blvd./ Alhambra Connector would improve freeway access, reduce congestion, and generally improvement mobility and safety while protecting the neighborhoods of Emery Park and El Sereno. A new connector road would follow the natural topography, avoid taking any homes, and would only require a business on Caltrans property to be relocated. The new road, which would go under the Rail Road tracks, would be coupled with a number of other strategies to increase mobility, including coordinating traffic signals; straightening Alhambra Blvd; adding a light at Lowell; redistributing traffic to under-utilized Mission Rd; encouraging the use of major arterials and discouraging distribution of traffic to local street with speed humps and turn restrictions; dual left turn lanes; peak hour turn restrictions; and a Neighborhood Traffic Management Plan for protecting local neighborhoods.

The project was to be funded using Rogan funds, and funds from LADOT and Metro. Apparently a draft EIR was prepared on the project, but never released. That is very unfortunate because it appears the project would be a cost effective way to increase mobility, with minimal adverse environmental impacts when compared with a major freeway or toll way project. South Pasadena is not endorsing this particular project, but believes the video how far less costly multi-modal alternatives can facilitate mobility without adversely impacting communities. We include a copy of the DVD that was prepared by LADOT for Caltrans' consideration.

Additionally, if a surface route were included in the EIR/EIS, the EIR/EIS will have to consider changes related to the Gold Line Light Rail Transit and Alameda Corridor implementation; a variety of procedural and substantive issues relating to air quality; and additional cultural resources and related issues. Further, a fiscal plan for the implementation of the project as a whole would have to be prepared.

If a surface route is included in the EIR/EIS, a preliminary environmental analysis will have to be conducted of the five different routes in order to determine which one avoids most adverse environmental impacts. As discussed in some detail subsequently, if section 4(f) historic

impacts can be avoided by an alternative route (which we are confident is the case), that alternative would have to be pursued rather than one with section 4(f) historic impacts, unless it is infeasible. Once a surface route is selected, a detailed mitigation plan would have to be developed. Further, the air quality modeling of criteria pollutants, carbon monoxide hotspots, PM 10 and 2.5, and air toxics would have to be much more extensive that that required for a tunnel. For the tunnel, emissions from venting and from the entrances and exits would have to be considered, along with the induced emissions from the additional vehicles the 710 would carry, and the growth inducing impacts, but the many sources of individualized hotspots will likely be consolidated into only a few locations.

The dispersion modeling for a surface route would be much more complicated than for a tunnel. Instead of analyzing point sources of pollution at tunnel portal, vents, exits, etc., an air quality analysis of a surface route would have to analyze emissions emanating all along the entire route as an indirect source of air pollution. Such dispersed pollution is much harder to quantify, analyze, and control because it is harder to separate the components and impacts of such sources from ambient sources of pollution. The mitigation plan for a surface route would likely be much more complicated, and less effective, than the mitigation measures that may be imposed in the context of a tunnel where the air pollution would be released at a restricted number of sources.

5. If the Surface Route is Not Deleted, Detailed Air Quality Studies and Historical Surveys Will be Required for More Sites than if the Surface Route is Eliminated from Further Studies.

Caltrans and Metro can save substantial funds by eliminating the surface route from detailed consideration, because if it is left in, detailed air modeling and historical surveys will be required for areas that would not be impacted by the tunnel or a properly designed multi-modal alternative.

If a surface route remains under consideration, a multitude of air quality studies and health risk assessments will be required in the EIR/EIS. Last month, the South Coast Air Quality Management District declared that without mobile source reductions, the basin will not meet federal particulate matter (2.5 microns) and ozone standards. (Revisions to 2007 PM 2.5 and Ozone State Implementation Plan for South Coast Basin and Coachella Valley, March 2011, available online at http://www.aqmd.gov/hb/attachments/2011-2015/2011Mar/2011-Mar4-039.pdf, herein incorporated by reference.) If the Project will increase the number of vehicles travelling through the corridor, which seems to be a project objective, air quality impacts could extend beyond increases in pollutant concentrations and emissions to exceedences of state and federal air quality standards. This impact will be both direct and cumulative. Satisfaction of CEQA will require the implementation of all feasible mitigation, a potentially costly endeavor in itself.

The Project will contribute to increases in the emissions of ultrafine particles by increasing the number of vehicles traveling through the corridor. Motor vehicles, and especially diesel trucks, emit high concentrations of diesel particulate matter. While all particulate matter adversely impacts human health, ultra fine particulate matter is especially dangerous to human health. Measured below PM-2.5, ultra fine particulate matter causes cardiovascular and neuron damage. (http://www.arb.ca.gov/research/health/healthup/jan03.pdf; see also http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info%3Adoi%2F10.1289%2Fehp.1002973, both incorporated by reference.) More than 90 percent of the particles in diesel exhaust are ultrafine particles, which are easily inhaled into the lung. (Matsuoka, Hricko, et al. Global Trade Impacts: Addressing the Health, Social, and Environmental Consequences of Moving International Freight Through Our Communities, March 2011, p. 17, available at http://departments.oxy.edu/uepi/, herein incorporated.) Diesel particulate matter also contains gases such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde and polycyclic aromatic hydrocarbons, increasing the hazards to human health. (http://www.epa.gov/NE/eco/airtox/diesel.html, herein incorporated by reference.) Consequently, diesel particulate matter was declared a toxic air contaminant by the California Air Resources Board in 1998. (http://www.arb.ca.gov/enf/hdvip/ccdet/saej1667.htm.) According to the Air Resources Board, "Diesel particulate matter may cause cancer, premature death, and other health problems." (Id; see also, http://www.arb.ca.gov/ch/communities/ra/westoakland/documents/factsheet0308.pdf.) These other health problems include asthma, bronchitis, and heart disease[1]. (http://www.ehib.org/page.jsp?page_key=90#pm_health.) Freeway traffic can increase the background diesel particulate matter concentration in locations up to 1,000 feet away. (Yifang Zhu, et. al., Study of Ultrafine Particles Near a Major Highway with Heavy-Duty Diesel Traffic, 36 Atmospheric 4323-4335 (2002), Attachment G.) Health risk assessments and other studies must account for impacts at least 1,000 feet away from the project.

After quantification of Project emissions is complete, the EIR/EIS will need to correlate the potential emissions with impacts to human health in a broad-based health risk assessment. Since the Project's air quality impacts will be both direct and cumulative, the health risk assessment will need to look at the potential for health impacts basin-wide. Special attention will need to be paid to sensitive receptors – those living near the Project, attending school near the Project, children, and the elderly.

Even with all feasible mitigation, a surface route will likely effect significant unavoidable impacts on the community and on the South Coast Air Basin as a whole. Some of the Project's likely impacts cannot be mitigated. For example, we understand no scrubber has been developed that effectively removes ultrafine particulate matter.

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[1] Miller et al., Long Term Exposure to Air Pollution and Incidence of Cardiovascular Events in Women, New England Journal of Medicine, 356:5 (2007) 447-458, available at http://burningissues.org/car-www/pdfs/miller-women-cv-NEJM4-2007.pdf, herein incorporated.

V. THE PURPOSE AND NEED FOR THE PROJECT SHOULD BE CLEARLY DEFINED.

A. Definition of Transportation & Air Quality "Study Area" for EIR/EIS Purposes.

Since the presumed benefits associated with a "gap closure" are largely regional in nature, the EIR/EIS must provide a detailed comparison of regional impacts and benefits resulting from the Project and a comparison of those regional impacts and benefits with other regional transportation alternatives (including the "no-build" alternative).

As defined in the NOP, however, the "study area" for the EIR/EIS would be limited to a "localized" analysis of the study area bordered by:

- Interstate 10 to the south
- Interstate 605 to the east
- Interstate 210 to the north
- State Route 2 to the west

In order to provide a valid assessment and comparison of the regional impacts (and benefits) of the Project and viable regional alternatives, the EIR/EIS should include a broader study area that is "regional" in nature, consistent with the regional nature of the majority of the trips associated with the proposed Project.

This does not mean that the EIR/EIS should include a detailed evaluation of local traffic conditions outside of the currently defined "study area." Rather, the EIR/EIS should include consideration of a broader "regional" study area for the purpose of quantifying the total effect of the project on regional trip patterns (trip generation, mode choice, etc.), and associated regional impacts. For example: the extent to which the Project would result in an increase in total daily and/or peak period motor vehicle trips (due to induced demand at the regional level, which may include additional traffic resulting from induced demand outside the study area as defined in the NOP), should be quantified in order to assess the Project's impact on regional greenhouse gas emission targets. In addition, the EIR/EIS should include, at the least, a qualitative assessment of potential traffic impacts outside the NOP study area that could result from increased throughput on I-710, SR-710 and/or induced demand on other corridors. (Further discussion on this point is provided in the discussion of multi-modal transportation impact criteria below).

B. Criteria for Comparing Project & Alternatives (Multi-modal Transportation).

The criteria for evaluating Project impacts, and comparing the Project with other Regional Alternatives, should include the following indicators:

1. Total Person Trips Served.

The EIR/EIS should include a forecast of total regional person trips served by the Project and each Regional Transportation Alternative (including the No-Build Alternative), including a clear and defensible explanation of the methodology used for forecasting the following:

- Trip Diversion (Path of Travel): The travel demand forecast and the assignment of trips for transportation impact analysis purposes should be clearly explained in the Draft EIR/EIS, and should based on a detailed assessment of the extent to which the proposed "710 Gap Closure project" would divert traffic from other, currently congested corridors to the 710. In addition to potential impacts to local arterials, trip diversion will impact future-year volumes on the Pasadena Freeway, as well as the I-10 and I-210 corridors due to a portion of traffic potentially shifting from I-10 to I-210, and vice versa.

- Travel Mode Diversion: The provision of additional freeway capacity is likely to divert some trips from other modes (compared to the "no-build" and other alternatives), including transit trips converted to motor vehicle trips, carpool trips converted to single-occupancy vehicle trips, bicycle and pedestrian trips converted to other modes, and off-peak trips converted to peak trips, etc. The EIR/EIS should provide a clear explanation for the assumed level of "travel mode diversion" resulting from the Project.

- Net Change in Regional Trips (including "induced" demand): Since other regional corridors (including those described above) would have additional capacity following the diversion of trips to SR-710, the EIR/EIS transportation analysis should provide a clear description of the net increase in peak period and daily regional trips (for all modes) resulting from induced demand on other corridors, resulting from the Project and from each Alternative (including the No-Build Alternative).

2. Secondary Traffic Impacts.

If the project is found to result in a net increase in regional motor vehicle trips (for peak and daily traffic), the EIR/EIS should include an assessment of the ability of "downstream" facilities to accommodate the increase in motor vehicle throughput. Such "downstream" facilities include the other regional freeway corridors as well as key arterials impacted by those regional freeways. In particular, the provision of added capacity on SR-710 could have the "inverse" effect of ramp-metering at some locations, as "free flow" conditions on SR-710 could cause extreme congestion at downstream "choke-points" since traffic would no longer be effectively "metered" in arriving at those downstream locations.

3. Transit Impacts.

If the project is found to result in a net increase in regional transit demand (particularly if the transportation model is forecasting an increase of potential transit trips based on the provision of HOV lanes as proposed for the Project): the EIR/EIS should assess the capacity of existing and future (funded) transit services to accommodate the additional ridership. To the extent the

Project would generate additional demand for transit services that are currently unfunded, the EIR/EIS should identify impacts to transit as significant (with appropriate mitigations to ensure that the Project includes funding for the implementation and on-going operation of additional transit services).

4. Total Travel Time.

The EIR/EIS should provide a comparison of average "total travel time" (total end-to-end travel time in minutes for the entire length of each travelers journey, based on the regional model) on SR-710 and each of the other key freeway corridors most directly affected by the Project.

- The estimate of total travel time should take into account any potential increases in downstream delay resulting from Project traffic (i.e., potential bottlenecks on other facilities, resulting from added traffic from SR-710).

- The "average total travel time" comparison should be provided with and without the Project, and for each Alternative, so that reviewers and members of the public can evaluate the potential $5.6 billion construction cost relative to the actual time savings.

5. Impacts to Multi-Modal Circulation and Local Streets.

The design of the Project and its alternatives should be evaluated with respect to the potential impacts to multi-modal circulation on the adjacent street network. This should include a comparison of changes in local circulation conditions resulting from:

- The proposed design of on-ramps and off-ramps, and intersections where those on- and off-ramps would intersect the adjacent arterial and collector street network.

- Impacts to multi-modal circulation resulting from project mitigations necessary to accommodate the Project (for example: widening of intersections approaching freeway access and egress points, lengthening of intersection signal cycle lengths, etc.)

- Potential impacts to multi-modal circulation, including traffic volumes on arterial, collector and local streets, resulting from induced demand.

C. Regional Transportation Alternatives.

Although not explicitly stated in the NOP, the perceived benefits associated with building the proposed 4.5-mile segment of SR-710 are based largely on the assumed <u>regional</u> benefit to the entire metropolitan area (particularly Los Angeles County and the Inland Empire, noting the

proposed connection between the I-10 and I-210 corridors, as well as the I-5 and US 101 corridors to the north and west).

Given the reliance on perceived regional benefits to justify the Project, the EIR/EIS should provide a comparison of the Project with other regional transportation alternatives that could be implemented within a similar timeframe (i.e., prior to the "future-year" analysis year of 2030, 2035 or 2040). This is necessary to ensure that public officials and members of the public will be able to engage in an informed debate as to regional impacts and benefits resulting from the Project (in comparison with other regional alternatives), and for determining the best use of regional transportation dollars.

Ideally, regional alternatives to the proposed Project will be defined such that the estimated cost of each alternative could be roughly similar to the Proposed Project. So for instance, the regional impacts (and benefits) resulting from the potential $5.6 billion construction cost for the Project could be compared to other regional transportation projects with similar costs that are viable but currently unfunded. This could include a collection of smaller projects defined as a single "regional alternative" for EIR/EIS purposes.

Since the EIR/EIS analysis of transportation and air quality impacts resulting from the Project will be based on forecasted conditions for the future analysis year (i.e., 2030, 2035 or 2040) those regional transportation projects that are currently proposed (but not yet funded or fully approved) would not be included in the Cumulative "baseline" analysis of background conditions (with or without the Project). This includes a number of *proposed regionally significant, multi-modal transportation facilities that could be evaluated as potential "alternatives" to the proposed project*:

1. The Funding for a Tunnel Could be Directed to Potentially More Effective Alternatives.

- Regional Transit Improvements (proposed but currently unfunded, or not scheduled to be funded by the "future analysis year" to be evaluated by the EIR/EIS) that could be implemented by the future analysis year (if funded, rather than the Project). One or more of these could be evaluated as a stand-alone "regional transit alternative" or combined as part of a larger "regional multi-modal alternative"):
    - Bus Rapid Transit (BRT) Corridor Improvements
        - Del Monte Corridor: identify unfunded improvements to the Del Monte BRT corridor that could be included as a stand-alone Alternative (or combined with other smaller projects as a "hybrid" alternative to the Proposed Project).

        - MetroRapid expansion: identify currently planned/proposed (but unfunded) MetroRapid corridors that could be included in the comparison with regional transportation alternatives to the proposed Project.

    - High Speed Rail (HSR) – regional segments
        - San Fernando Valley to Irvine Corridor (via Downtown LA)
        - Downtown LA to Inland Empire (via Metrolink Riverside Corridor)

    - Metrolink Corridor Improvements
        - San Bernardino Line
        - Riverside Line (included in HSR above)

    - MetroRail
        - Westside Subway (extension of Purple Line to Santa Monica)- although not directly affecting the immediate study area, the overall regional impacts and benefits of implementing the Westside Subway extension prior to 2030 (rather than the "710 Gap Closure") could be considered, perhaps at a qualitative level. The intent would be further inform the broader discussion of whether or not regional transportation funds could produce greater regional mobility and air quality benefits if dedicated to other projects in the region.
        - Future extension of light-rail east from downtown LA—Green Line, etc.
        - Consider travel time improvements to Gold Line (and/or supplemental BRT service) as a "local" measure to mitigate travel demand near the "710 Gap Closure" project location (while noting that the overall emphasis should be on "regional" measures, which may make Gold Line corridors less desirable relative to other multi-modal alternatives).

- Regional Freight Improvements that could be implemented by 2030 (if funded) as part of potential regional alternatives to the Project:

    - Alameda Corridor
        - Identify remaining (unfunded) improvements to the Alameda Corridor that could be included in the Alternatives Analysis, either as a stand-alone or as part of another "hybrid" alternative to the proposed Project. (In developing "hybrid" alternatives, the total cost of any "hybrid" alternative would ideally be roughly similar to the total cost of the Proposed Project, for comparison purposes).

    - Congestion Pricing
        - Consider use of congestion pricing for automobile (non-truck) traffic on designated freight corridors, to ensure adequate capacity is available for regional freight movement.

- High Speed Rail (HSR)
  - THE EIR/EIS evaluation of this alternative could include consideration of the benefits to freight movement, as well as passenger rail service, resulting from the proposed grade separations associated with HSR. Furthermore, many HSR lines accommodate freight, either during "off-hours" (when passenger lines are not operating) and/or on adjacent freight tracks that can take advantage of the grade separation and right-of-way improvements that would accompany HSR.
  - Evaluate the extent to which HSR improvements could help to alleviate the perceived need for improving truck circulation via the proposed "710 Gap Closure."

- Regional Freeway Network modifications that could expand the carrying capacity of the freeway network, allow for greater movement of freight, and potentially reduce greenhouse gas emissions, such as:
  - Conversion of existing mixed-flow travel lanes to accommodate additional high-occupancy vehicle (HOV) and/or high-occupancy/toll (HOT) lanes, to provide additional capacity for freight and the movement of people.

2. An Example of a Potential Regional Alternative.

An example of how one of the potential projects described above could be treated (for EIR/EIS comparison purposes) is provided below:

Proposed Alternative (Example): High Speed Rail (HSR) Alternative – Downtown LA to Inland Empire

- Description: Proposed HSR improvements between Downtown Los Angeles and Inland Empire (included in the California HSR Plan as a "Phase 2" improvement following construction of the proposed main line between Irvine and San Francisco).
  - For EIR/EIS purposes, this Alternative could be defined as implementation of necessary improvements to accommodate HSR on the Metrolink Riverside corridor (parallel to I-10 and I-210), consistent with the California HSR plan, between Downtown Los Angeles and Riverside.
  - Cost: Based on initial HSR plans, the cost would likely be $5 billion to $10 billion (potentially less than the cost of the 4.5-mile "710 Gap Closure" project).
  - The EIR/EIS evaluation of this alternative should include consideration of the benefits to freight movement, as well as passenger rail service, resulting from the proposed grade separations associated with HSR. Furthermore, many HSR lines

accommodate freight, either during "off-hours" (when passenger lines are not operating) and/or on adjacent freight tracks that can take advantage of the grade separation and right-of-way improvements that would accompany HSR.

- Evaluate the extent to which HSR improvements could help to alleviate the perceived need for improving truck circulation via the proposed "710 Gap Closure."

- Since the HSR project is not yet fully funded or approved at the State level, the HSR alternative (for EIR/EIS purposes) could be limited to an assessment of regional transportation benefits, limited to those person trips and freight movement internal to the Los Angeles metropolitan area and/or SCAG region. For example, even in the absence of a statewide HSR program, potential HSR upgrades to the Metrolink Riverside corridor (such as grade separation and electrification) would produce substantial reductions in travel time for Metrolink commuters.

- Compare the total "regional" benefit of the "710 Gap Closure" with the proposed HSR corridor upgrades (*i.e., "would the region benefit more from $5.6 billion spent on a 4.5-mile motor vehicle tunnel between East LA and Pasadena, or would $5.6 billion spent on improvements to a 50-mile high-speed passenger and freight rail corridor be more likely to produce greater benefits to the region as a whole?"*)

Other regional transportation alternatives could be defined in a similar manner as described in the example above, but this should be done in conjunction with impacted and interested governments.

3. Policy Considerations Favor Alternatives to the Tunnel.

To the extent that regional goals place a priority on reducing VMT and associated greenhouse gas and public health impacts, it would be far better to invest in travel demand management programs and transit, bike, and pedestrian infrastructure in the region's urban cores. In coordination with a coordinated regional land use planning effort, such a policy could facilitate more compact "low traffic" regional growth.

The most efficient way to expand the regional freeway network would be to convert some existing mixed-flow lanes to high-occupancy toll (HOT) lanes. Conversion of some or all of the regions unmanaged lanes to managed HOT lanes is perhaps the only possible way to simultaneously meet regional goals of congestion reduction, CO2 reduction, improved public health outcomes, and economic prosperity.

a. The EIR/EIS Should be Based on Current Traffic and Air Modeling.

Future traffic volumes in Southern California will likely be much lower than have been forecast in recent years. Part of this is due to the changed economic picture; traffic volumes have not yet returned to the peaks of the middle of the past decade. In the longer-term, Senate Bill 375, which requires reductions in mobile source green house gas emissions, will have an even greater impact on future traffic volumes. New regional planning assumptions include more compact future land use, more investments in transit, and road pricing.

Caltrans has been slow to update their planning work to account for these new realities. For example, the June 2010 DEIR/DEIS for the Interstate 5 North Coast Project not only failed to account for S.B. 375, but included forecast traffic growth on the I-5 that was twice what was modeled in the San Diego Association of Governments (SANDAG) pre-S.B. 375 adopted long-range transportation plan. Assuming such unrealistic future traffic distorts alternative analyses and overestimates the benefits of adding highway capacity. These problems must not occur in the "710 Gap Closure" Project analyses.

b. Use Realistic Truck Traffic Assumptions.

S.B. 375 focuses on passenger travel. As truck traffic also is an important issue in the "710 Gap Closure" Project, special attention should be given to truck traffic forecasts. There is high uncertainty in this area as future truck traffic will be influenced by many factors including: general economic conditions, future fuel prices, competition between the U.S. and other nations in goods production, competition between freight modes, competition between different ports, competition between rail and truck. For too long, outdated high growth forecasts have been used which extrapolate growth from the housing bubble period. For this study, it is important that freight forecasts be up-to-date and the assumptions be clearly spelled out.

c. Importance of Using Full SCAG Modeling Capability.

SCAG has developed very complex travel demand modeling capacity that accounts for traffic shifts that result from increased choices, including improved transit, shifts that result from congestion, and shifts that result from roadway pricing. Unfortunately, Caltrans has sometimes failed to incorporate these full modeling capabilities. Last year, a Caltrans District 7 employee, Tony Van Haagen, apparently was looking for validation for such a shortcut on the FHWA-sponsored Travel Model Improvement Program (TMIP) listserv, and wrote:

> According to knowledgeable people in the field the gravity model is overly sensitive to travel times which therefore in the feedback loop process may lead to more VMT increase due to a highway project than is actually the case.

After discussion on the list, Mr. Van Haagen wrote to Norm Marshall, who South Pasadena retained to provide modeling assistance:

> Thank you for bringing the paper by Rodier to my attention. It makes a strong case that the gravity model with a feedback process does produce realistic

> outcomes regarding induced traffic. The paper by Waddell et al. makes a good case for feedback through land use for the long term impact of highway projects. Fortunately, these ideas are slowly being incorporated in models now.

Mr. Van Haagen's response that feedback is "slowly being incorporated in models now" is an understatement. The use of a "gravity model with a feedback process" has been required by the Federal Clean Air Act Conformity modeling regulations in air basins that have been identified as being in nonattainment and maintenance of the ozone and carbon monoxide ambient air quality standards since 1993, and therefore has been used throughout this period in Southern California for modeling air pollution.

It is important to emphasize that Van Haagen's initial position was that including distribution feedback would make the project appear to perform worse. It would perform worse because it would properly account for the induced traffic that would result from the project. The modeling for the "710 Gap Closure" Project must use the full SCAG travel demand model including feedback for all alternatives in order to properly account for induced traffic.

SCAG has recognized that even their advanced travel demand model is not sensitive enough to some of the policies necessitated by S.B. 375. It has developed the Local Sustainability Planning Model which was designed to:

> Allow local jurisdictions to analyze the impacts of different land use scenarios on such transportation outcomes as vehicle ownership and vehicle use, mode shifts, VMT, and the effects of these on GHG emissions. This tool was prescribed to be simple to understand and use, highly visual, and offer virtually immediate feedback to user test scenarios. SCAG intends to add the model to its Suite of Services that makes available to local jurisdictions through the Demonstration Projects program and other planning assistance efforts, and to ensure its easy access and broad use, the model will be designed to be available on SCAG's website as an interactive ArcGIS-based tool.[2]

In the "710 Gap Closure" Project, regional travel demand modeling work should be supplemented with more detailed modeling in the study area communities using the Local Sustainability Planning Model.

d. Accounting for Indirect Traffic Impacts.

i. Attempting to Eliminate Bottlenecks.

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[2] Kuzmyak, J. Richard in partnership with Fehr & Peers and Fregonese Associates. *Local Sustainability Planning Model Development Final Report*, p. 1. SCAG Contract No. 09-035-C1, March 2010.

Roadways operate as a system where a bottleneck at one location helps to prevent bottlenecks in other locations. Therefore, the value of "fixing" bottlenecks can be minimal. Here's an example from the Chicago region:

> The "Hillside Strangler"—the point at which the East-West Tollway and the Tri-State Tollway converge with the Eisenhower Expressway—was long a notorious traffic bottleneck. After a $140 million construction project to "fix" the problem, the Daily Herald posed this question: "Many millions have been spent to change that evil Hillside Strangler. So, has it been rehabilitated?"
>
> This was the answer:
>
> 1. Getting through the Strangler is now about 15 minutes faster.
> 2. But the bottleneck has merely been pushed further up the road to a point where the
> 3. Eisenhower funnels into three lanes.
> 4. And more motorists are now using the expressway since the Strangler work was completed.

The *Daily Herald* concluded: "Overall, then, the commute time from the suburbs to the Loop, via the Eisenhower and its extension, is one hour—exactly what it was before the Hillside Strangler was repaired." (More Costly Roadwork, and Travel Still Tough, *Daily Herald*, October 3, 2002)

These effects also are present at the regional level as observed in the Boston region in region to the $15 billion "Big Dig" project:

> The upshot is that Massachusetts, for the $15 billion invested by the state and federal taxpayers, got a gleaming new highway system that has made zipping beneath Boston and Boston Harbor much easier. It increased overall mobility by allowing more people to travel at peak times. But most travelers who use the tunnels are still spending time in traffic jams – just not in the heart of the city, where bumper-to-bumper was a way of life on the old elevated artery. (Boston Globe. Big Dig pushes bottlenecks outward: Artery has cleared, but commutes longer on several major routes. November 16, 2008.)

The *Globe* documents a number of trips where travel times have increased, including one case where peak period travel time has doubled from 12 minutes to 25 minutes.

In the project environmental review process, these traffic increases are a type of "secondary impact" that are required to be disclosed but generally are not. The *Globe* reports:

> The Globe findings provide a fuller picture of the traffic situation than a state-commissioned study done two years ago, in which the Big Dig was credited with helping to save at least $167 million a year by increasing economic productivity

and decreasing motor vehicle operating costs. *That study did not look at highways outside the Big Dig construction area and did not take into account new congestion elsewhere.*

ii. Including Regional Performance Measures.

The "710 Gap Closure" Project should include regional performance measures, including vehicle miles traveled (VMT) and vehicle hours traveled (VHT) in order to assure that all traffic impacts are included in the analysis results. The SCAG model will do a fair job of accounting these impacts on the arterial roadway system if it is applied correctly including feedback. However, the model does not do this perfectly. The SCAG regional travel demand model, like most other similar models, treats each road segment as independent. A bottleneck is modeled as a severe delay at the point of the bottleneck but little or no delay is calculated for the roadway upstream of the bottleneck. In reality, the delay is experienced primarily behind the bottleneck and the bottleneck location is where the traffic begins moving freely again. Therefore, the modeling should be supplemented by review of bottleneck locations in order to assess whether the model is adequately accounting for the impacts of bottlenecks. Otherwise, the benefits of roadway expansion at an existing bottleneck location will be overestimated.

In the study area, it may also be necessary to consider impacts on minor arterial and collector streets that are not in the SCAG model. No trip begins or ends on a limited access roadway. Metering traffic flow –with a bottleneck and/or congestion pricing on a major roadway – helps to meter traffic on local streets as well. Removing such bottlenecks can cause greatly increased local street congestion during peak periods. If these local streets are not modeled, the negative traffic impacts will be underestimated.

In the "710 Gap Closure" Project, indirect traffic impacts that will result from capacity expansion must be fully accounted for, including regional impacts on VMT and VHT, impacts on other arterials, and impacts on local roadways.

e. Toll Modeling, Including Congestion Pricing.

i. Making the Tunnel a Toll Road.

It appears likely that a toll and a "public-private partnership" will be an important component of the "710 Gap Closure" Project. First, legislation would be required to allow a "gap closure" to proceed by way of a public private partnership, and the success of such legislation is uncertain. Second, tolls, and especially congestion pricing, can offer multiple benefits, including paying for a portion of project costs, and reducing indirect impacts on other roadways. However, toll modeling must be done accurately. Several studies, including one conducted by the Transportation Research Board, have found a consistent bias towards overestimating toll road usage and revenues when compared to post-opening usage and revenues. Robert Bain, who

previously worked for Standard and Poors rating toll road bonds and now is in private practice, has written:

> The empirical evidence on toll road traffic and revenue forecasting performance is clear and consistent, and should send three stark warnings to analyst: errors are common, they are commonly large and over-prediction – optimism-bias – is a consistent theme. The TRB sample demonstrated that two-thirds of revenue forecasts were off-target by more than 25%. This is a striking finding in terms of predictive accuracy. It is more worrying from a credit perspective to note that the vast majority (>90%) of these errors were over-predictions. Very few observations (only 5 out of 105) reflected circumstances under which toll revenues had been under-predicted by more than 25%![3]

The "710 Gap Closure" Project toll analyses must be based on strong economic theory including realistic values of time. In addition, the model applied should be validated against toll traffic and revenue in other corridors.

ii. Equity Analyses of Tolls.

Environmental justice analyses often address only the effects of proposed roadway capacity in proximity to poor income and minority populations, but there are other important equity issues that should be analyzed in the EIR/EIS. These include:

- How much toll cost is paid by different income groups
- Are traffic benefits of alternatives evening spread equally across different income groups?
- Are indirect traffic impacts spread equally across different economic groups?
- Are benefits and indirect traffic impacts variable by geography?
- Who ultimately pays for the cost of the project?

Common patterns with roadway expansion projects that often are not disclosed include A) benefits only to high-income toll payers, with indirect impacts falling on those unable to pay tolls, and B) benefits to those living further from the regional core with indirect impacts falling on those living in close in. Analyses of these issues should be included in the "710 Gap Closure" Project EIR/EIS.

iii. Properly Considering and Communicating Uncertainty.

Fitch Ratings toll road analysts think too little attention is paid to model uncertainty. They write:

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[3] Bain, Robert: *Toll Road Traffic & Revenue Forecasts: An Interpreter's Guide*, p. 40, 2009.

> Model error is the one vulnerability that has been given short shrift in traffic studies and has not been discussed in any postmortem analysis. The ability to model a real life situation is limited, let alone over a 30- or 40-year period. Each of the traffic forecasting models developed for these purposes inherently has some model error factor. Even if all the inputs and assumptions were, in fact, proved to be perfectly accurate, actual results would likely not match the forecast. This potential variability from the base case represents model error. Forecasters tend to point to model calibration and validation near 100% to actual traffic in a base year to make the case that model error is not a concern. Validation has been demonstrated to be more reliable when actual traffic counts on a toll road are available, but less so on greenfield projects. While the average error in a validation may be demonstrated to be small, the average may mask a problem, which when compounded within the model and over time, may severely skew results. This is an issue that is not discussed in an adequate level of detail in traffic and revenue reports.[4]

In science, there often is an estimation of 95 percent confidence intervals. In traffic forecasting, we lack the tools to estimate confidence intervals. If we could estimate confidence intervals, the intervals would be very large as was illustrated in the toll road forecasting errors documented above. Therefore, it is misleading to report to the public numbers like the traffic volume will be exactly 112,000 in 2035 or the trip will take exactly 7.9 minutes longer in 2035. In order to avoid these types of results, two approaches can be used: 1)"stress tests" where key assumptions are varied (similar to those that were applied to banks during the economic crisis) and 2) probabilistic modeling where parameters are changed in random ways. The probabilistic approach was recently employed in Seattle in a very similar case – except that case considers removing a freeway instead of building one. Here is the abstract from the research paper describing the work:

> Uncertainty is inherent in major infrastructure projects, yet standard practice ignores it. We investigate the uncertainty about the future effects of tearing down the Alaskan Way Viaduct in downtown Seattle, using an integrated housing, jobs, land use and transportation model, on outcomes including average commute times. Our methodology combines the urban simulation model UrbanSim with the travel model Emme/3. We assess uncertainty using Bayesian melding, yielding a full predictive distribution of average commute times on 22 different routes in 2020. Of these routes, 14 do not include the viaduct and eight do. For the 14 base routes that do not include the viaduct, the predictive distributions overlap substantially, and so there is no indication that removing the viaduct would increase commute times for these routes. For each of the eight routes that do include the viaduct, the 95% predictive interval for the difference in average travel times between the two scenarios includes zero, so there is not strong

[4] Cherian et. al. 2004, p. 4.

> statistical support for the conclusion that removing the viaduct would lead to any increase in travel times. However, the median predicted increase is positive for each of these routes, with an average of 6 minutes, suggesting that there may be some measurable increase in travel time for drivers that use the viaduct as a core component of their commute.[5]

This abstract communicates the results much more completely than a single number can. Tearing down the Alaskan Way Viaduct would have no significant impact on commuters who do not use it today. For those who do use it today, the median estimated increased time is 6 minutes, but the range of possible outcomes includes no travel time increase at all.

The "710 Gap Closure" Project should include stress tests and/or probabilistic analyses, and similarly present nuanced modeling results honestly.

VI. THE EIR/EIS MUST COMPREHENSIVELY ADDRESS ALL OF THE PROJECT'S POTENTIALLY SIGNIFICANT ENVIRONMENTAL EFFECTS.

In light of the inadequacies of the NOP, it should be revised to include a clear and complete project description. After revision to provide sufficient information to the public about what the 710 Gap Closure will entail and where it will be located, the new NOP should be recirculated for scoping comments. If the NOP is not revised and recirculated, however, an adequate EIR must be prepared.

To be legally adequate, an EIR must comprehensively identify and address all of the "significant environmental effects" of a proposed project. (Public Resources Code § 21100(b)(1); CEQA Guidelines § 15126.2.) "All phases of a project," including "planning, acquisition, development, and operation," must be addressed. (CEQA Guidelines § 15126.) And both "[d]irect and indirect significant environmental effects" must be analyzed, "giving due consideration to both the short-term and long-term effects." (CEQA Guidelines § 15126.2(a).)

A. The EIR/EIS Must Contain a Complete Project Description.

The EIR/EIS for this Project must comply with CEQA's requirement that the environmental review document provide "[a]n accurate project description" which "is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." (*McQueen v. Board of Directors of the Mid-Peninsula Regional Open Space District* (1988) 202

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[5] Sevcikova, Hana, Adrian E. Raftery and Paul A. Waddell. "Assessing Uncertainty About the Benefits of Transportation Infrastructure Projects Using Bayesian Melding: Application to Seattle's Alaskan Way Viaduct, Working Paper no. 90 Center for Statistics and the Social Sciences University of Washington, March 26, 2009.

Cal.App.3d 1136, 1143.) The EIR/EIS must correct the problems of the NOP by including a complete and accurate Project description that sets forth all aspects of the Project including answers to the following questions and inclusion of the requested information and analysis:

- The NOP defines the beginning of the alleged "gap" but does not provide beginning or end points for the project or even whether or not the project will be a highway-type project with defined beginning or end points. If multiple termination points are being considered, these should be identified.
- The letter accompanying the NOP states, "an underground highway tunnel is under consideration" but does not state what alternatives to a tunnel are being studied. What are they? This information is necessary because each type of gap closure will have different types of environmental impacts.
- What are the five alignments are under consideration? What cities or neighborhoods do they traverse? Which of these would entail cut and cover and where would the ventilation shafts be located?

If not remedied with the preparation and circulation of a new NOP, the EIR/EIS must contain a complete project description.

B. The EIR/EIS Must Use the Proper Baseline.

Before the impacts of a project can be assessed and mitigation measures considered, an EIR/EIS must describe the existing environment. It is only against this baseline that any significant environmental effects can be determined. (Guidelines, §§ 15125, 15126.2, subd. (a).) Based on the title of the project alone (710 Gap Closure), which implies a gap in the 710 freeway between Alhambra and Pasadena instead of the existing *terminus*, it appears that Caltrans and Metro may be relying on Caltrans' original projection of 710 completion, rather than the existing roadway. Regardless of terminology, the EIR/EIS must use existing conditions to determine impact analysis. It cannot rely on prior entitlements or preexisting freeway designations. The California Supreme Court has recently disallowed use of existing entitlements as the baseline for environmental review. The Court held, "using hypothetical allowable conditions as the baseline results in 'illusory' comparisons that 'can only mislead the public as to the reality of the impacts and subvert full consideration of the actual environmental impacts,' a result at direct odds with CEQA's intent." (*Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310, 322.) Thus, the EIR/EIS must set as the baseline the project site conditions that existed on March 2, 2011, the date the NOP was posted.

C. Segmentation of Environmental Review is Prohibited.

The EIR/EIS must analyze the whole of the 710 improvement project, in conjunction with the widening proposed for the "710 South" project south of downtown. (CEQA Guidelines § 15378.) CEQA requires that "'[a]ll phases of project planning, implementation, and operation must be considered in the initial study of the project.'" (*Tuolumne County Citizens for*

Responsible Growth, Inc. v. City of Sonora (2007) 155 Cal.App.4th 1214, 1222; CEQA Guidelines § 15063(a)(1).) "A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole." (*Orinda Assn v. Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1171.) Unfortunately, it appears that Caltrans may be attempting to segment environmental review for the 710 Project into two separate projects, the "710 Gap Closure" to the north, and the "710 South" project to the south. Together, these projects will expand the capacity of the entire 710 freeway corridor, from its terminus at the Port of Long Beach, to its proposed end at the 210 freeway. And together, these projects will encourage increased use of the 710 corridor as a conduit for port cargo. This is especially true if the 710 Gap Closure project envisions a highway project. CEQA requires that the direct and cumulative impacts of these projects – traffic, air quality, health impacts on communities through which the 710 freeway passes, and more – be assessed together.

D. The EIR/EIS Must Discuss Economic Considerations.

CEQA requires that a lead agency consider feasible alternatives and to adopt all feasible mitigation measures that reduce a project's environmental impacts. (Pub. Res. Code §21002.) Feasible "means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Res. Code §21061.1; Guidelines §15002 subd. (a)(3).) Accordingly, the EIR/EIS must include economic data, including the anticipated costs of each alignment and alternative under consideration so that decisionmakers can realistically assess the feasibility of alternatives and mitigation measures.

Cost considerations are particularly important with regard to an underground tunnel alternative, if one is proposed. Construction estimates for a tunnel range from $3 billion to more than $11 billion. Information about a tunnel's cost and cost of mitigation is necessary so that the great expense of potential alternative is not used as a basis for declaring important mitigation infeasible. Estimates of the construction cost of a tunnel should take into account the complexities of tunnel construction, especially those related to the region's seismic instability. Even Boston's Big Dig, which is not located in a seismically active area, experienced cost overruns in the billions of dollars. (Massachusetts Office of the Inspector General Report, "A History of Central Artery/Tunnel Project Finances 1994 - 2001: Report to the Treasurer of the Commonwealth," (March 2001), available at http://www.mass.gov/ig/publ/cat01ex.htm, herein incorporated.) Given the difficulty of obtaining state and federal transportation dollars in this economic climate, it is important to compare the relative cost of any tunnel alternative to that of the other alternatives under consideration, whatever they may be.

E. The EIR/EIS Must Analyze Neighborhood Impacts.

The primary purposes of CEQA are to require public agencies to disclose information to the public and to facilitate a meaningful assessment of a project's environmental impacts. In

doing so, CEQA fosters governmental transparency and accountability. (*Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal. 3d 553, 564 ("*Goleta II*").) The statute's public information purpose is especially important with regard to the 710 Gap Closure project's impacts on the established neighborhoods in what Caltrans has termed the "gap."

Caltrans currently owns hundreds of homes in the corridor. For each alternative and each alignment contemplated (especially for highway alternatives), the EIR/EIS must discuss what will happen to these homes, the neighborhoods and the families currently living within. For example, residents have asked what will happen to properties at the ends of a tunnel if one is proposed. If families must be relocated, the environmental impacts of relocation must be addressed in the EIR/EIS, as well as the environmental impacts of any new construction that would be required. If relocation will result in physical impacts, the EIR/EIS must also address the economic impacts of dividing established neighborhoods and the potential for creating urban blight. (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal. App. 4th 1184, 1204.)

To avoid relocation impacts, the EIR/EIS should analyze alternatives that retain homes and neighborhoods. A multi-modal alternative that emphasizes transit solutions over freeway solutions is one option. Poor maintenance of homes for which Caltrans is the landlord has allowed rapid degradation of some homes that borders on urban blight. This situation could be remedied by returning ownership of these homes to the occupants, a solution that should be discussed in the EIR/EIS.

If the preferred alternative is a tunnel, the issue of underground property rights must be address for homes and locations that Caltrans does not own. An EIR/EIS discussion of this issue could satisfy the public disclosure purpose of CEQA. The EIR/EIS should also discuss whether purchase or imminent domain is contemplated for specific properties located along all evaluated alignments, for all alternatives under consideration.

F. A Highway Project Would Likely Degrade Regional and Local Air Quality.

Due to the induced vehicle demand of additional freeway capacity, any highway project alternative or alignment will impact regional and local air quality with increased vehicular emissions. While the existing academic literature reveals an ongoing debate as to the magnitude of new travel induced by roadway investments, there is little doubt that the relationship is positive: roadway investments are associated with an increase in vehicle miles traveled (VMT). Furthermore, transportation investments influence land use patterns in the long run. While much of the literature does not attempt to separate the short-run impact of more and longer trips by residents of existing communities from the long-run impact on land-use development, several studies do attempt to disentangle these relationships.

- Based on the available literature it is reasonable to assume that short-run elasticities of vehicle-miles of travel (VMT) with respect to lane-miles are estimated to be on the order of 0.2 to 0.6.

- Long run elasticities are between 0.6 and 1.0, meaning that for each one percent increase in lane-miles, VMT increases by 0.6 to 1 percent in the long-run.

As VMT increases, so do vehicular emissions. These emissions include carbon dioxide, carbon monoxide, and diesel particulate matter, among others. The EIR/EIS must provide a thorough analysis of anticipated vehicle emissions and the impacts on human health and the environment.

1. Particulate Matter.

If proposed, extension of the 710 freeway to reach the 210 freeway will encourage the freeway's use by heavy, diesel-fueled trucks travelling from the Ports of Los Angeles and Long Beach. A large increase in the number of diesel-fueled vehicles will cause an increase in the emissions of diesel particulate matter. The California Air Resource Board has declared diesel particulate matter a hazardous air pollutant. (http://www.calepa.ca.gov/about/history01/arb.htm.) It is correlated with higher incidence of asthma, serious heart and lung ailments[6], cancer, and premature death. (http://www.arb.ca.gov/fuels/diesel/dieselfs.pdf.) The traffic analysis used for determination of air quality impacts in the EIR/EIS must include a realistic estimate of diesel-fueled truck use, which must be correlated to air quality impacts and to impacts on human health. Sensitive receptors, children, the elderly, and those living and working near the alignments under consideration, must be addressed.

Studies have found that adults exposed to traffic-related pollution (living within 328 feet of a freeway) have twice the average progression of atherosclerosis[7], higher rates of diabetes[8], greater heart and lung-caused mortality, and higher rates of chronic obstructive pulmonary

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[6] Murray Mittleman, Air Pollution, Exercise, and Cardiovascular Risk, New England Journal of Medicine, 357:11:1147-1147 (2004).

[7] Kunzli N et al., Ambient air pollution and the progression of athrerosclerosis in adults. PLoS One 2010; Feb 8;5(2):e9096, available at http://www.plosone.org/article/info:doi/10.1371/journal.pone.0009096, herein incorporated.

[8] Kramer U et. al, Traffic-related air pollution and incident type 2 diabetes: Results from the SALIA cohort study. Environmental Health Perspectives 2010; 118(9)1273-9, available at http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info%3Adoi%2F10.1289%2Fehp.0901689, herein incorporated; Pearson et al., Association Between Fine Particulates and Diabetes Prevalence in the U.S., Diabetes Care, 33:10, October 2010, available at http://care.diabetesjournals.org/content/early/2010/07/12/dc10-0698.short?rss=1, herein incorporated.

disease (COPD and emphysema)[9] development than adults who are not. (Matsuoka, Hricko, et al., "Global Trade Impacts," (March 2011), at p. 18, available at http://departments.oxy.edu/uepi/.) Woman exposed to traffic-related pollution are more likely to have premature and low birth weight babies, are more prone to miscarriage and pregnancy complications, and have higher rates of breast cancer and age-related cognitive impairment[10] than women who are not. (Matsuoka, Hricko, et al., "Global Trade Impacts," (March 2011), at pp. 17-18, available at http://departments.oxy.edu/uepi/.) These health impacts should be studied in the EIR/EIS and the health risk assessments.

2. Other Air Toxics.

The "710 Gap Closure" Project EIR/EIS must comply with the federal air toxics guidance. EPA and FHWA have identified seven compounds with significant contributions from mobile sources that are among the national and regional-scale cancer risk drivers from the EIR/EIS 1999 National Air Toxics Assessment. These compounds are acrolein, benzene, 1,3-butadiene, diesel particulate matter plus diesel exhaust organic gases (diesel PM), formaldehyde, naphthalene, and polycyclic organic matter. The Federal Highway Administration issued Interim Guidance on Model Source Air Toxic Analysis in NEPA in February 2006 and updated this Guidance in September 2009. This guidance divides projects into three levels of impacts. If a freeway project is proposed, the "710 Gap Closure" Project will likely include alternatives that would have the highest (third) impact level due to the combination of high traffic volume, high truck volume, and proximity to population.

The project should be analyzed for effects due to mobile surface air toxics (MSAT), as well. Meaningful differences in MSAT emissions likely exist among project alternatives and must be analyzed. Only a limited number of projects meet this two-pronged test, but those that do require more rigorous assessment under NEPA. Any highway project considered will require more rigorous assessment because it will:

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[9] Anderson ZJ et al., Chronic Obstructive Pulmonary Disease and Long-term Exposure to Traffic-Related Air Pollution: a Cohort Study. Am J Respir Crit Carre Med. 2011 Feb. 15, 183(4) 455-61, available online at http://ajrccm.atsjournals.org/cgi/content/abstract/183/4/455, herein incorporated; Schikowski et al., Long-term air pollution exposure and living close to busy roads are associated with COPD in women, Respiratory Research (2005) 6:152, available at http://respiratory-research.com/content/6/1/152, herein incorporated.

[10] Ranft U, Long-Term Exposure to Traffic-Related Particulate Matter Impairs Cognitive Function in the Elderly. Environ Res 1009; 109(8):1004-11, available at http://www.sciencedirect.com/science?_ob=ArticleURL&_udi=B6WDS-4X541NJ-1&_user=10&_coverDate=11%2F30%2F2009&_rdoc=1&_fmt=high&_orig=gateway&_origin=gateway&_sort=d&_docanchor=&view=c&_searchStrId=1714367904&_rerunOrigin=google&_acct=C00005022 1&_version=1&_urlVersion=0&_userid=10&md5=7dad1b4a38e8f03157b3ab8379b72540&searchtype=a , herein incorporated.

- Create new or add significant capacity to urban highways such as interstates, urban arterials, or urban collector-distributor routes with traffic volumes where the AADT is projected to be in the range of 140,000 to 150,000 or greater by the design year; and
- Be proposed in proximity to populated areas.

Caltrans should contact the Office of Natural and Human Environment (HEPN) and the Office of Project Development and Environmental Review (HEPE) in FHWA Headquarters for assistance in developing a specific approach for assessing impacts. This approach would include a quantitative analysis to forecast local-specific emission trends of the priority MSAT for each alternative, to use as a basis of comparison. This analysis also may address the potential for cumulative impacts, where appropriate, based on local conditions. The EIS for this project should also include relevant language on unavailable information described in Appendix C. If the analysis for a project in this category indicates meaningful differences in levels of MSAT emissions, mitigation options should be identified and considered. [11]

3. Tunnel-Specific Impacts.

If a tunnel is proposed, it will have unique impacts on regional and local air quality because tunnels limit the dispersion of gases and particulate matter. Tunnel ventilation will concentrate vehicular emissions, leading to potentially dangerous conditions near vents, such as carbon monoxide hot spots, carbon dioxide buildup (which will ultimately disperse, but not immediately), and high concentrations of other pollutants. Scrubbers can remove particulate larger matter, but not gases. Scrubbers cannot eliminate ultrafine particulate matter, the type that is the most dangerous to human health. Accordingly, if a tunnel is proposed, the EIR/EIS must discuss the potential impacts of tunnel ventilation on a local and regional scale. Analysis of impacts on sensitive receptors, such as residents located near proposed vents and attendees of nearby private and public schools, is required. Hot spot analyses for schools, daycare centers, parks, hospitals, the Huntington Memorial Hospital and other public gathering places must be performed. For example, if an exhaust system will be proposed next to the high school, as it was in Metro's 2006 preliminary assessment, the impacts must be disclosed and mitigated.

4. The EIR/EIS Cannot Rely on the 1992 Air Quality Analysis.

A new air quality and traffic analysis is required for the EIR/EIS, based on an updated traffic study. More than 18 years have passed since the 1992 air quality analysis was performed. This analysis is wholly irrelevant to today's conditions. Moreover, federal law now requires particulate analysis of PM 2.5. Additionally, the regulation in place in 1992 required less rigorous analysis to PM 10. Consequently, reliance on prior air quality analysis would violate both CEQA and NEPA.

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[11] http://www.fhwa.dot.gov/environment/air_quality/air_toxics/policy_and_guidance/100109guidmem.cfm

G. Impacts to Schools Must be Assessed and Fully Mitigated.

Regardless of whether or not a tunnel alternative is proposed in the Project EIR/EIS, the document must include an in-depth assessment of all potential impacts on nearby public and private schools, daycare centers, camps, and educational programs. The EIR/EIS should consider the conclusions of Andrea Hricko's study on health impacts in schools, "Road to an Unhealthy Future for Southern California's Children," (available online at http://www.qualityfacts.com/en/Article2_USC_Report.pdf, attached as Exhibit H.) Dr. Hricko concludes that children in more polluted communities have reduced lung function[12] and more frequently suffer from asthma.[13] (Hricko, at 1; *see also*, Matsuoka, Hricko, et al. "Global Trade Impacts," (March 2011), at p. 17, available at http://departments.oxy.edu/uepi/.) Higher ozone levels cause acute respiratory problems in schoolchildren. (Hricko, at 1.) These illnesses cause children to miss more school than they would otherwise, and may affect learning. (Hricko, at 3.) These findings are particularly important because Southern California already has some of the highest levels of particulate matter and ozone in the country. (Id.) Diesel particulate matter concentrations exist up to 1,000 feet from highways. (Attachment G.) A highway project of any kind will increase these levels, and their impacts on schoolchildren.

The EIR/EIS should also assess the impacts that the Project will have on cognitive development. A study, released this month linked ultrafine freeway particulate matter to brain damage in both young and adult mice. (Todd E. Morgan et al.,"Glutamatergic Neurons in Rodent Models Respond to Nanoscale Particular Urban Air Pollutants," Environmental Health Perspectives, abstract available online at http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info%3Adoi%2F10.1289%2Fehp.1002973.) Lead author Todd Morgan, research professor at USC, said, "Our

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[12] WJ Gauderman, et al., Effect of Exposure to Traffic On Lung Development from 10 to 18 Years of Age: A Cohort Study, Lancet 2007; 369(9561):571-7, available online at http://www.i-70east.com/DEIS/Comment_98_033109.pdf, herein incorporated; WJ Gauderman et. al., The Effect of Traffic on Lung Development from 10 to 18 Years of Age, New England Journal of Medicine 351:11 (2004):1057-1067, available online at http://www.nejm.org/doi/full/10.1056/NEJMoa040610, herein incorporated.

[13] *See also*, M. Brauer, et al., Air Pollution from Traffic and the Development of Respiratory Infections and Asthmatic and Allergic Symptoms in Children, Am J Respir Crit Care Med, Vol 166 (2002):1092–1098, 2002, available online at http://ajrccm.atsjournals.org/cgi/content/full/166/8/1092, herein incorporated; McConnell R et al., Childhood Incident Asthma and Traffic-Related Air Pollution at Home and School, Environ Health Perspect 2010 Jul; 118(7): 1021-6., available at http://ehp03.niehs.nih.gov/article/info:doi%2F10.1289%2Fehp.0901232, herein incorporated; McConnell R et al., Traffic, Susceptibility, and Childhood Asthma. Environ Health Perspect 2006; May 114(5):766-72, available at http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info:doi/10.1289/ehp.8594, herein incorporated.

data would suggest that freeway pollution could have a profound effect on the development of neurons and brain health in children and young kids, especially those who attend schools built alongside freeways." ("Freeway Air Pollution Linked to Brain Damage in Mice, Greenspace, Los Angeles Times, April 7, 2011, available online at http://latimesblogs.latimes.com/greenspace/2011/04/freeway-air-pollution-brain-damage-mice.html.) Dr. Morgan continued, "limiting one's exposure – especially children's exposure – to freeway pollution is essential to control asthma, cardiovascular conditions and cognitive development." (Id.)[14] The EIR/EIS must commit to all feasible mitigation.

H. The EIR/EIS Must Evaluate Conformance with the Greenhouse Gas Reduction Goals of SB 375.

Data on total person trips served, induced demand, travel mode diversion, and freight circulation should be useful to evaluate the Project's conformance with local targets associated with conformance with SB 375, which requires regional reduction targets for greenhouse gas emissions (GHG), and prompts the creation of regional plans to reduce emissions from vehicle use throughout the state. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating "Sustainable Community Strategies" (SCS). The MPOs are required to develop the SCS through integrated land use and transportation planning and demonstrate an ability to attain the proposed reduction targets by 2020 and 2035. CARB has proposed and SCAG has adopted a regional GHG reduction target over 2005 baseline of 8% by 2020 and 13% by 2035 (with the 2035 target conditioned on ongoing discussions with the between SCAG and CARB). The extent to which the Project supports, or conflicts with, regional efforts to achieve these GHG reduction targets as part of SCAGs pending regional SCS planning efforts should be carefully evaluated in the EIR/EIS.

I. All Traffic Related Impacts Must Be Analyzed.

1. A Highway Project Would Likely Increase Use of the Corridor by Diesel Trucks.

If proposed, connecting the 710 freeway to the 210 freeway will allow for greater use of the corridor by diesel trucks delivering cargo from the Ports of Los Angeles and Long Beach.

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[14] Other studies have recommended minimizing emissions exposure to schoolchildren. *See*, R. Green et. al, Proximity of California Schools to Busy Roads, Environmental Health Perspectives, 112:1(2004): 61-66, available at http://ehp03.niehs.nih.gov/article/fetchArticle.action?articleURI=info%3Adoi%2F10.1289%2Fehp.6566, herein incorporated; W. James Gauderman, Air Pollution and Children: An Unhealthy Mix, New England Journal of Medicine, 355:1 (2006) 78-79, available at http://www.stichtingduurzamea12.nl/documents/air%20polltion%20and%20children%202.pdf, herein incorporated.

The ports are already the largest freight complex on the west coast but anticipate a two-fold increase in incoming cargo over the next twenty years. (San Pedro Bay Ports Rail Study Update, http://www.portoflosangeles.org/DOC/REPORT_SPB_Rail_Study_ES.pdf, at ES-4, herein incorporated.) The increased port intake will affect the project corridor in two ways. First, the ports are rapidly renovating their terminals to accommodate larger container ships and more frequent ship calls, so there will be more containers for trucks to transport through the 710 corridor. Second, the ports are increasingly shifting delivery of incoming freight from trains to trucks to accommodate this massive influx of cargo. Increased diesel truck use will impact the 710 corridor in numerous ways, each of which must be analyzed and mitigated in the EIR/EIS. The most obvious impacts are increased traffic congestion, additional degradation of air quality (especially due to particulate matter), and the resulting health impacts of reduced air quality.

2. A Highway Project Would Increase Traffic by Inducing Demand.

By providing additional freeway capacity and inducing motorist demand, any highway project considered would increase traffic through the corridor. The basic economics of induced demand are clear: when a motorist is deciding whether to make a trip, he or she considers the cost of the trip. That cost includes both time costs and monetary costs. Providing additional freeway capacity reduces the time cost of the trip, and this reduced time cost results in more motorists deciding to make the trip. Adding new capacity will result in the following impacts on motorist behavior, as single occupant cars will switch routes of travel to take advantage of the new capacity. The modeling undertaken for the EIR/EIS analysis must account for these changes in travel behavior:

- In the short-run, a highway project might be expected to result in an increase in efficiency due to reduced congestion, yielding a decrease in emissions per mile of travel and a decrease in regional emissions.

- In the long-run, however, when additional capacity reduces congestion and thereby reduces the cost of driving, drivers will make more trips and longer trips. In addition, induced travel will include new trips that would not have otherwise been made.

- In addition, adding new capacity to the region's freeway system will lower the cost of long commutes, increasing demand for housing in communities farther from the urban core. Newly available freeway capacity will indeed make possible more development on the periphery of the SCAG region, yielding longer trips. Therefore, the modeling methodology needs to take this into account when evaluating the potential air quality impacts resulting from the Project.

- Furthermore, the assessment of induced demand should consider the public health impacts associated with increased driving and reduced bike/pedestrian/transit trips if a highway project is completed. These are secondary impacts that can be discussed in a

similar vein as the GHG impacts vis a vis state public health policy initiatives (http://www.sgc.ca.gov/hiap/) and local LA County public health policy initiatives (http://publichealth.lacounty.gov/place/).

The induced demand of a highway project will increase environmental impacts associated with motorist travel.

3. Induced Demand Would Degrade Regional Air Quality.

If the Project is a highway project, increased vehicle miles traveled will diminish local and regional air quality, as described above. The EIR/EIS analysis of regional air quality impacts, including conformance with SB 375 goals to reduce greenhouse gas reductions, should include consideration of recent literature[15] that provides relevant information and empirical relationships concerning:

- Induced Travel Demand Resulting from Freeway Network Expansion
- Estimated Carbon Dioxide Impact (Resulting from Induced Demand)
- Policy Considerations for Confirming with Regional Goals & SB 375

4. A Tunnel's Single Access Point Would Result in Traffic Impacts.

If a proposed tunnel alternative will provide only a single access point, the Project will result in traffic backups and potential traffic hazards. Impacts to local and regional circulation must be assessed in the EIR/EIS.

5. Toll-way Operations Must be Analyzed.

There has been discussion in the past about operating a tunnel alternative as a toll road for trucks travelling to and from the ports. If Caltrans is contemplating a toll road, the potential locations of toll plazas and resulting impacts of operations of toll operations must be analyzed and mitigated in the EIR/EIS. Potential impacts include, but are not limited to:

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[15] Relevant studies include:

Hansen, Mark, "Do New Highways Generate Traffic?" *Access*, No. 7, Fall 1995, pp. 16-22; Fulton, Lewis et al. "A Statistical Analysis of Induced Travel Effects in the U.S. Mid-Atlantic Region", *Journal of Transportation Statistics*, April 2000; Lee, Douglas B. et al "Induced Traffic and Induced Demand." *Transportation Research Record*, 1659;
Johnston, Robert et al. "Applying an Integrated Model to the Evaluation of Travel Demand Management Policies in the Sacramento Region." Mineta Transportation Institute, San Jose State University; Cervero, Robert. "Road Expansion, Urban Growth, and Induced Travel: A Path Analysis." *Journal of the American Planning Association*, Volume 69, No. 2 June 2003, 145 - 163.

- traffic delays during or before payment of tolls and any impacts on the circulation of the 710 freeway, 210 freeway and nearby local streets;
- increases in local cut-through traffic seeking to avoid toll payment;
- air quality impacts, including carbon monoxide hot spots and increased particulate concentrations; and
- health impacts to employees.

If a toll road is proposed, whether or not in conjunction with a tunnel, the EIR/EIS must address all foreseeable potential impacts.

6. Traffic Mitigation Must be Incorporated in the EIR/EIS.

As the project will clearly have impacts on local and regional traffic circulation, detailed mitigation must be included in the EIR/EIS.

J. Careful Analysis of Geotechnical Impacts of Any Tunnel Would be Required.

The EIR/EIS must completely and thoroughly analyze the Project's potential geotechnical impacts. The current terminus of the 710 freeway, the 210 freeway alignment, and all of the area between are heavily faulted and seismically active. The Raymond Fault and the Elysian Park Anticline, in particular, may cause impacts for any tunnel or surface route proposed. The EIR/EIS must analyze all of the project's alternatives *and* considered alignments for possible impacts caused by earthquakes, landslides, and other geotechnical concerns. If any potential impacts are found, they must be entirely mitigated, especially for a tunnel alternative, where a collapse could kill or injure many motorists, residents, and emergency responders at once. It must be noted that a portion of Boston's Big Dig tunnel collapsed and killed a motorist in 2006, in an area of relative seismic stability.

K. A Tunnel Would Have Potentially Significant Public Safety and Hazard Impacts to Motorists, Residents, and Emergency Personnel.

In addition to concerns about the seismic stability of a tunnel, the EIR/EIS must thoroughly analyze and mitigate safety impacts resulting from runaway trucks, transport of hazardous and flammable materials, and fire. The magnitude of these impacts will increase dramatically should a tunnel alternative be chosen. If any of the possible gap closure alternatives or alignments will expose traffic to a significant grade, this must be disclosed in the EIR/EIS. Mitigation for runaway trucks must be included. Moreover, trucks routinely transport hazardous chemicals that can leak or spill in an accident. Some chemicals, for example those carried by fuel tankers, are extremely flammable and can ignite spontaneously or in a traffic accident. The EIR/EIS must discuss the anticipated impacts to motorists in or near the Project, residents living above a tunnel alternative or near its exits, and to emergency responders in the event of a hazardous material spill and/or fire. With regard to a tunnel alternative, the analysis should

discuss the increased fire danger as well as any ventilation system that can be used to minimize the likelihood of a Caldecott Tunnel-like incident, wherein seven people were killed and two were injured after a traffic collision caused a gasoline leak that later exploded.

The EIR/EIS must also analyze and discuss emergencies caused by a combination of factors that may affect a highway project. Unfortunately, a truck-involved accident caused by an earthquake and resulting in a hazardous materials spill or fire is all too foreseeable. Consideration and development of an emergency response plan, and analysis and mitigation of resulting impacts would be wise now.

L. Impacts of Emergency Exits.

In light of the safety concerns presented by a tunnel, any tunnel alternative will require several well-defined emergency exits, to be placed along a defined distance interval. The EIR/EIS must disclose the location of these tunnel exits, and discuss, analyze, and mitigate impacts including, but not limited to:

- traffic impacts on local circulation when exits are used;
- access to emergency exits and adequate signage;
- seismic concerns during construction and operation of exits;
- aesthetic impacts of safety exits, depending on location and the extent and type of grading used;
- impacts to property, property owners, property ownership and any relocation of current residents due to construction or operation of emergency exits. Metro's experience in construction of the Red Line under the Hollywood Hills demonstrates that adverse impacts to the properties above a tunnel are very real and must be examined; and
- operational impacts on residents that will be impacted but not relocated.

M. Public Services May be Impacted.

The EIR/EIS must address the ability of the California Highway Patrol and local fire and police departments to access and provide services to vehicles trapped in any tunnel during a fire, earthquake, or other emergency, and to vehicles simply stalled in a tunnel, bottling up traffic. Response times for various locations within a tunnel should be indentified in the EIR/EIS, as well as any increase in response time for residents near the Project site due to the development of the Project.

N. Construction and Operational Noise Impacts Must Be Analyzed.

The EIR/EIS should include an analysis of noise impacts from the construction and operation of the Project, particularly with regard to impacts on sensitive populations, including

schools and other public facilities near the route. If a tunnel is proposed, any impacts resulting from tunnel venting and emission scrubbing mechanisms must be addressed, as well. The July 8, 2010 draft report prepared for Metro on Public-Private Partnerships suggests that a single 57" tunnel bore would be completed, and then only if traffic developed to warrant a second bore would it be constructed. Though it certainly makes sense not to construct a second tunnel if the traffic is not warranted, because there is considerable truth to the proposition that "build it and they will come," a second tunnel appears reasonably foreseeable, and the impacts of construction of both it and vents for it, and the more extended construction period, would have to be considered if a tunnel is the preferred alternative.

O. Historic Resources Must be Analyzed.

The EIR/EIS must discuss impacts to historic resources that will occur due to construction and operation of the Project. Given the 18-year lapse since the last major analysis of a 710 north extension, it is likely that historic resources have changed, and that additional properties now qualify as historic under state and federal guidelines. It is also notable that the injunction placed in *City of South Pasadena v. Slater* relied, in part, on the failure to fulfill commitments to analyze properties whether properties not eligible for listing on the National Register of Historic Properties were eligible for listing on the California Register. The EIR/EIS must analyze eligibility for both registers.

P. Cumulative Impacts with the 710 South Project Must Be Analyzed.

Additionally, the EIR/EIS must discuss the cumulative environmental impacts of the Project. These impacts will include, but are not limited to, impacts resulting from the completion of the 710 South Project, which will expand freeway capacity between the Ports of Los Angeles and Long Beach and through the gateway cities to the Project area. Together, the projects will allow far more diesel trucks to travel between the ports and points east and west along the 210 freeway. The increase in vehicle trips, and especially in trips through the area by diesel trucks, will result in cumulative traffic impacts and cumulative safety impacts, particularly if a tunnel is proposed. Most notably, the cumulative synergies of the two projects will result in cumulative air quality impacts on the region, as increased vehicle trips add diesel particulate matter, carbon monoxide, and other harmful pollutants to the air. The EIR/EIS must analyze all of the Project's foreseeable cumulative impacts and perform a health risk assessment that correlates these potential cumulative impacts to human health.

VII. THE EIR/EIS MUST COMPREHENSIVELY ANALYZE MITIGATION MEASURES AND ALTERNATIVES TO A HIGHWAY PROJECT.

The EIR/EIS must analyze mitigation measures for all of the Project's significant impacts and must discuss alternatives to the proposed Project. (CEQA Guidelines § 15126.) All "feasible mitigation measures which could minimize significant adverse impacts should be

described in the EIR/EIS" and, when several measures are available to mitigate an impact, the EIR/EIS should discuss each measure and provide reasoning for selecting one over another. (CEQA Guidelines § 15126.4.)

The EIR/EIS should also "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives . . . even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (CEQA Guidelines § 15126.6.) This discussion must include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project," and expressly must address "[t]he specific alternative of 'no project,'" the purpose of which "is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project."

While it is clear from the NOP that Caltrans and Metro will be analyzing several alternatives to the project and several alignments, the NOP is unclear about what these alternatives will be and where these alignments will be located. The City urges the agencies to thoroughly vet alternatives that will reduce traffic and air quality impacts, minimize the importance of the region's seismicity, and conserve historic resources and existing neighborhoods. One alternative that should be considered is a multi-modal alternative, which combines rail, bus, and other transit strategies to reduce freeway demand. Given the multibillion dollar cost of any potential tunnel alternative, South Pasadena believes a multi-modal alternative will be feasible and more cost effective.

VIII. CONCLUSION.

Thank you for your attention to this matter. The City of South Pasadena stands ready to work with Caltrans and Metro, and other interested agencies, to develop a viable multi-modal solution. South Pasadena believes that greater mobility can be achieved in the region by using the funds allocated in Measure R on a mix of other measures (combined to act as a Multi-Modal alternative), and that such a multi-modal solution should be pursued. A multi-mode solution should be developed along with a cost-benefit analysis prior to selection of a preferred alternative, which is a necessary precedent to preparation of a legally adequate Notice of Preparation.

Even now, however, Metro and Caltrans can and should vote to exclude the surface route from further consideration. There is more than adequate evidence in the record of the dramatic adverse impacts that would be caused by a surface freeway. Excluding such a freeway will fully comply with CEQA's mandate to minimize adverse impacts and only analyze alternatives that would reduce, not increase, the impacts of the preferred project. The elimination of the surface freeway will have the added benefit of allowing the sale of the lands in the corridor that Caltrans

has long owned and rented out, with often unfortunate consequences. This sale could generate much needed revenue for the State.

When the Draft EIR/EIS is prepared, it will be required to analyze a lengthy list of possible adverse impacts from any project including the short term construction impacts and phasing impacts. This will be important if a project such as a tunnel is the preferred alternative. The Draft EIR/EIS will also need to analyze the long term environmental impacts on health. If Caltrans and Metro identify a multi-modal approach as their preferred alternative, a long standing controversy may finally be resolved, and greater mobility achieved in the region at a more cost-effective manner.

Sincerely,

Mike Ten Mayor	Michael A. Cacciotti Mayor Pro Tem

Philip C. Putnam Councilmember	Richard D. Schneider, MD Councilmember	David Sifuentes Councilmember

Attachments:

Attachment A	Nelson\Nygaard Consulting Associates, Inc. Firm Resume and Resumes of Jeffrey Tumlin and Colin Burgett
Attachment B	Resume of Norm Marshall, Smart Mobility Inc.
Attachment C	Excerpts of City of South Pasadena's Petition for Writ of Mandate
Attachments D & E	Letter from Advisory Council on Historic Preservation
Attachment F	Letter from Felicia Marcus, Regional Administrator for EPA
Attachment G	Study of Ultrafine Particles Near a Major Highway with Heavy-Duty Diesel Traffic
Attachment H	Road to an Unhealthy Future for Southern California's Children
Attachment I	The Proposed Valley Boulevard Alhambra Avenue Connector (DVD)

cc: Board of Directors, Los Angeles Metropolitan Transportation Authority
Doug Failing, Executive Director, Highway Programs, Metro
Council Members, City of South Pasadena

ATTACHMENT A

Nelson\Nygaard Consulting Associates, Inc. Firm Resume and Resumes of Jeffrey Tumlin and Colin Burgett

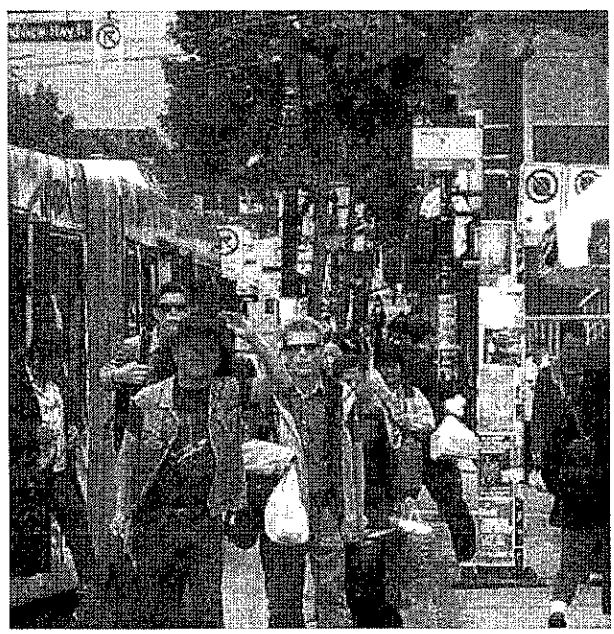
Nelson|Nygaard
consulting associates

A Different Kind of Transportation Planning

Nelson\Nygaard Consulting Associates Inc., headquartered in San Francisco California, is distinguished by its commitment to planning transportation systems and identifying mobility improvements that help build and support vibrant, sustainable communities.

A fully multi-modal approach, drawn from the real world experiences of industry specialists, is a hallmark of every Nelson\Nygaard project. Covering all modes of transportation, we specialize in transit, transit oriented development, accessibility and tools that balance the needs of each mode.

Since its inception in 1987, Nelson\Nygaard has grown into a nationally recognized firm with seven offices covering North America. Today, our personnel work with a wide variety of clients including public transit operators, regional and state planning organizations, city and county municipal departments and private sector customers.



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San Francisco, CA Portland, OR New York, NY Boston, MA Seattle, WA Burlington, VT Salt Lake City, UT

Jeffrey Tumlin

Principal

An expert with 17 years of experience in multimodal transportation planning, with an emphasis in minimizing the impacts of growth.

Bachelor of Arts, with distinction, Urban Studies,
Stanford University

Experience

Nelson\Nygaard Consulting Associates Inc.

Principal, 2000–Present
Senior Associate, 1998–2000

Jeffrey Tumlin has managed projects in the following key areas since 1998:

- **Transit Oriented Development and station area plans** for four dozen rail station areas in the San Francisco Bay Area, Dallas, Vancouver, BC, Washington, DC and Seattle regions. Tumlin is also managing a $5 million as-needed planning contract for BART that covers everything from station area planning to comprehensive station access, TOD and engineering standards. He co-authored BART's *Station Access Guidelines and Transit Oriented Development Guidelines*. Key TOD projects include:
  - **Pleasant Hill BART Station Area Plan and Design Development.** Led the transportation planning effort in an intensive charrette process that produced a Form Based Code. See http://www.co.contra-costa.ca.us/depart/cd/charrette. Project broke ground in 2006.
  - **BART Station area plans for Castro Valley, South Hayward, Glen Park and Balboa Park stations.** See http://www.bart.gov/about/planning/home.asp.
  - **Seattle Westlake Hub Study.** In the core of Seattle's downtown retail district, six major transit lines will converge in a broad six-block area. This study recommends tools to optimize transfers among these various lines.
  - **WMATA Metro Shady Grove, Rhode Island Avenue, and Takoma Park station area studies.** These conceptual studies helped build community support for infill development at two stations in the Washington DC region.
  - **San Mateo Transit Corridor Plan.** This plan proposes up to 4,000 new housing units and 4.5 million square feet of commercial over 600 acres around two train stations in this suburban California city. NN helped dramatically reduce traffic impacts by such measures as parking maximums and robust TDM requirements. See http://www.cityofsanmateo.org/dept/planning/ corridor.html
- **Transportation Master Plans for downtowns and cities,** including Seattle, WA, Santa Monica, CA, Trenton, NJ and Palo Alto, CA. In Seattle, Tumlin restructured the city's transportation performance measures to focus on Quality of Service indicators for all modes. Palo Alto's new performance indicators focus on quality of life, while Trenton's focus on economic development. Santa Monica has made a commitment to no net increase in vehicle trips, through programs funded in part by new fees on development.
- **Regional transit and Bus Rapid Transit Plans.** In Portland, Tumlin led the visioning for a 20-year regional High Capacity Transit plan. For BART, Tumlin led the evaluation of four rapid transit technologies and over a dozen alignments extending from the existing Dublin/Pleasanton station to Walnut Creek, Livermore and Tracy. Working through an intensive public process, the project Advisory Committee decided a combination of Bus Rapid Transit and rapid bus extensions were most productive given financial resources.
- **Transportation Management Plans** for major development projects. Building on his work at Stanford, Tumlin developed strategies to accommodate five million square feet of growth at NASA's Moffett Field while reducing traffic by 40%, largely through innovative program elements such as parking cash-out and on-site housing. Other major development projects include the San Mateo Bay Meadows area, the Genentech main campus, and Seattle's South Lake Union.

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- **Parking management strategies.** For San Francisco, Arlington VA, Seattle, WA, Walnut Creek, CA, and a variety of major employers and commercial districts, Tumlin has helped to identify the most cost effective mix of investments in new parking, improved parking management and transportation alternatives to meet local access and quality of life goals. In San Francisco, the city replaced parking minimums with maximums, following Tumlin's innovative analysis correlating parking with affordable housing production, gentrification and traffic generation (see www.betterneighborhoods.org).

Previous Experience

Stanford University Office of Transportation Programs
Program Manager, 1996–1997; Program Coordinator, 1994–1995; Special Projects Coordinator, 1992–1994

Selected Lectures and Publications

- *Transit Oriented Development Guidelines*, BART. Co-author.
- *Station Access Guidelines*, BART. Co-author.
- *"Making Transit Oriented Development Work,"* Planning, May 2003. Co-author.
- Parking Alternatives Handbook, US EPA Smart Growth Office, April 2004. Co-author.
- "Transportation Planning 101" for Rail~Volution, New Partners for Smart Growth and other national conferences, 2000-2008.
- Traffic Calming Workshops. San Francisco Planning & Urban Research, and with the Federal Highway Administration, 1999.
- "SoMa Traffic and Transport Planning." *Downtown Magazine*. 1999.
- "The Yosemite Area Regional Transportation Strategy." *ITE Journal*, CTAA Transit in the Parks Conference, and Business Journal TV show. 1999 and 2000.

Selected Awards

- 2008 Driehaus Form-Based Codes Award for the City of Benicia Downtown Mixed-Use Master Plan. Prime: Opticos.
- 2006 APA Northern California Section Honorable Mention, Castro Valley Redevelopment Strategic Plan. Prime: WRT
- 2005 Washington State APA Award for Excellence in Planning, Seattle South Lake Union Parking Study
- 2004 American Institute of Architects Honor Award for Outstanding Regional and Urban Design for "Getting it Right: Preventing Sprawl in Coyote Valley." Client: Greenbelt Alliance; prime: WRT/Solomon ETC.
- 2003 General Services Administration Achievement Award for Real Property Innovation, NASA Research Park
- 2000 'Consultant of the Year' Award, City of Palo Alto.
- 1997 Peninsula Conservation Center Business Environmental Award, Stanford Transportation Programs.
- 1997 American Lung Association Clean Air ENVY Award, Stanford Transportation Programs.
- 1995 American Society of Landscape Architects Merit Award for Palm Drive Project.

Colin Burgett, AICP

Principal

Over 14 years of professional experience in multi-modal transportation engineering and integrated land use/transportation planning.

Master of City & Regional Planning, Cal Poly San Luis Obispo, 1998

Bachelor of Science, Political Science, University of Oregon, 1993

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Experience

Nelson\Nygaard Consulting Associates Inc.

Principal, 2009-Present

Mr. Burgett has extensive transportation engineering, urban planning, public policy, site planning and land use/transportation design experience:

- **Integrated Transportation and Land Use Planning:** Mr. Burgett manages projects that place a strong emphasis on facilitating the interactions between transportation systems, land use patterns, and urban design components. For the Baylands Specific Plan in Brisbane (CA), Colin worked with a multi-disciplinary planning team to develop a land use/transportation plan that specified a mix of land uses at appropriate densities, with a street and urban design plan to facilitate internal circulation for pedestrians and transit service to include heavy rail, light rail and bus service.
- **Long-Range Transportation Plans and General Plan Updates:** Mr. Burgett authored the General Plan Mobility Element for the city of Petaluma (CA), managed General Plan Circulation Element updates in Pomona (CA) and Alameda County (CA), and initiated an update to the General Plan Housing Element in Oakland (CA). Colin prepared the transportation elements of Specific Plans, Campus Master Plans, Corridor Plans and Community Mobility Studies. Each long-range transportation plan included a 20-year program to maximize the efficiency of transportation systems through complementary land use planning, appropriate design, and enhanced transit, bicycle and pedestrian system components.
- **Transportation Engineering and Traffic Operations Analysis:** Through direct project experience, Mr. Burgett developed a sophisticated understanding of traffic operations analysis tools and travel demand forecasting methods. Colin managed the preparation of transportation impact studies for citywide plans, large area plans, residential projects, campus master plans, hospital retrofit projects, and mixed-use development projects.
- **Transit-Oriented Development and Station Area Plans:** Mr. Burgett collaborated with multi-disciplinary engineering, planning and urban design teams to prepare transit-oriented development (TOD) plans for various rail stations and transit corridors. Colin managed the Oakland Airport/Coliseum BART Station Area planning effort for the city of Oakland (CA), led development of a TOD-focused land use/transportation plan adjacent to the Bayshore Intermodal Station in San Francisco/Brisbane (CA), and developed street design and pedestrian improvement options for a proposed bus rapid transit (BRT) corridor in San Leandro (CA).
- **Bicycle and Pedestrian Planning:** Mr. Burgett places a strong emphasis on the incorporation of bicycle and pedestrian components within each planning effort. In addition, Colin authored bicycle master plans for the cities of Oakland (CA) and San Leandro (CA), and developed a pedestrian safety strategy for the city of Stockton (CA).
- **Campus Planning and Site Design:** Mr. Burgett developed campus transportation plans and designed transportation amenities for colleges, hospitals and large companies. Key clients have included City College of San Francisco, California Pacific Medical Center (San Francisco, CA), Genentech (South San Francisco, CA), and Foothill College (Los Altos Hills, CA).
- **Parking Needs Assessment and Parking Facility Design:** Mr. Burgett evaluated the adequacy of parking supply, and parking management policies for public agencies and private developers. Colin has designed parking facilities for various clients.
- **Traffic Calming and Neighborhood Traffic Management:** Mr. Burgett prepared traffic calming guidelines for cities such as Napa (CA), managed development of a Neighborhood Traffic Management program in Stockton (CA), and developed site-specific traffic calming components for various community planning efforts.

- **Transportation Demand Management (TDM) Strategies:** Mr. Burgett developed TDM strategies for cities, colleges, developers and institutional clients.

Previous Experience

Fehr & Peers, San Francisco, CA
Senior Transportation Engineer/Planner, 2001 – 2009

City of Oakland, CA, Community & Economic Development Agency
Strategic Planner, 1998 – 2001

City of Eugene, OR, Planning Department
Land Use Planner, 1995 – 1996

City of Tigard, OR, Planning Division
Land Use Planner, 1994

Publications and Presentations

- Author: *Hoover Area Community Mobility Plan (Transportation Element).* Redwood City, CA, 2008.
- Presenter: *Brisbane Baylands Plan Alternatives.* City of Brisbane, CA, 2008.
- Co-author and presenter: *Transit-Oriented Development and the Suburban Shopping Mall*, presented at the 45th annual International Making Cities Livable Conference in Portland, OR, 2007.
- Co-author and presenter: *Petaluma General Plan (Mobility Element).* City of Petaluma, CA, 2005.
- Co-author: *Bicycle and Pedestrian Master Plan.* City of San Leandro, CA, 2004.
- Author: *Street Design Guidelines* and *Pedestrian Safety Strategy.* City of Stockton, CA, 2003.
- Author and presenter: *Bicycle Master Plan.* City of Oakland, CA, 1999.

Professional and Community Affiliations

- Professional Certification: American Institute of Certified Planners
- Member: American Planning Association
- Member: Urban Land Institute

ATTACHMENT B

Resume of Norm Marshall, Smart Mobility Inc.

Norman L. Marshall
nmarshall@smartmobility.com

Education
Master of Science in Engineering Sciences
Dartmouth College, Hanover, NH, 1982

Bachelor of Science in Mathematics
Worcester Polytechnic Institute, Worcester, MA, 1977

Professional Experience
Smart Mobility, Inc, Norwich, VT
Principal
November 1, 2001 – Present

Mr. Marshall helped found Smart Mobility, Inc. in 2001 and is its President. Since SMI's founding, Mr. Marshall has managed projects in the Chicago, Austin, Baltimore, Washington D.C., Louisville and other regions.

Resource Systems Group, White River Junction VT
Senior Associate, Area Director, Senior Project Consultant
October 1987 - October 2001
During his 14 years at Resource Systems Group, Mr. Marshall developed a national reputation for innovative work in regional travel demand modeling and transportation/land use interactions. His experience includes developing travel demand models for Burlington Vermont, Portland Maine, Syracuse New York, the New Hampshire Seacoast region, and a statewide model for Georgia. He has completed many projects in Vermont covering areas including estimating traffic volumes, traffic operations, traffic impact studies parking, transit needs, and transit operations.

Relevant Projects *(Partial List)*
State Routes 5 & 92 Scoping Phase – evaluating Transportation Systems Management (TSM), Transportation Demand Management (TDM), transit and highway widening alternatives for the New York State Department of Transportation using local and national data, and a linkage between a regional network model and a detailed subarea CORSIM model.

Trip Generation Characteristics of Multi-Use Developments – estimated internal vehicle trips, internal pedestrian trips, and trip-making characteristics of residents at large multi-use developments in Fort Lauderdale, Florida.

L&M Park, South Burlington, Vermont – evaluated impacts of a proposed mixed use development on an entire urban arterial corridor. As a result of the study, a mitigation strategy was adopted that included formation of a Transportation Management Association (TMA).

State Routes 5 & 92 Scoping Phase – evaluating TSM, TDM, transit and highway widening alternatives for the New York State Department of Transportation using local and national data, and a linkage between a regional network model and a detailed subarea operations model using CORSIM.

Memberships/Affiliations
Associate Member, Institute of Transportation Engineers
Individual Affiliate, Transportation Research Board

Recent Publications and Presentations
Chicago Metropolis 2020: The Business Community Develops an Integrated Land Use/Transportation Plan with Lucinda Gibson, P.E., Frank Beal and John Fregonese, presented at the Transportation Research Board's Conference on Planning Applications, Fort Lauderdale Florida, March 2003.

Evidence of Induced Travel with Bill Cowart, presented in association with the Ninth Session of the Commission on Sustainable Development, United Nations, New York City, April 2001.

Evidence of Induced Demand in the Texas Transportation Institute's Urban Roadway Congestion Study Data Set, Transportation Research Board Annual Meeting, Washington D. C: January 2000.

ATTACHMENT C

Excerpts of City of South Pasadena's Petition for Writ of Mandate

project, does not express an opinion on the appropriateness of any of the other freeway projects included as part of the Sales Tax Measure. The sole object of this Petition is to ensure that Metro complies with CEQA prior to proposing, by initiative, funding for the 710 tunnel project.

12. Removing the improperly included 710 tunnel project from the ballot measure would not endanger the funding of any other project on the list or reduce the total amount available to fund necessary infrastructure projects. Section 11(a) of the measure allows Metro to amend the list of projects or to transfer funds among projects. Therefore, if the 710 tunnel project is removed from the measure, more funding would be available for public transit and other projects that have properly complied with CEQA.

JURISDICTION

13. This Court has jurisdiction over this proceeding under section 1094.5 of the Code of Civil Procedure and sections 21168 and 21168.5 of the Public Resources Code.

PARTIES

14. Petitioner City of South Pasadena is a political subdivision of the State of California.

15. Respondent Metro is the state-chartered regional transportation planning and public transportation operating agency for Los Angeles County.

16. Real Party in Interest California Department of Transportation (Caltrans) is the state agency that would responsible for constructing and operating the tunnel as part of the state system of highways.

17. Real parties named as Does 1 to 10 are given fictitious names because their names and capacities are presently unknown to Petitioner.

STATEMENT OF FACTS

18. State Route 710 (SR-710) begins in Long Beach and runs northward, crossing Interstate 10 (I-10) and ending just past I-10 in Alhambra. A separate portion of the freeway runs for approximately one-quarter of a mile south of the intersection of the I-210 and SR-134 freeways, and terminates at the I-210 intersection.

19. Between the terminus north of SR-710 and the one-quarter mile portion of the freeway south of I-210, a straight-line distance of 4.5 miles exists without a freeway. The tunnel project would extend the SR-710 to the I-210 along that straight-line route.

20. The proposed extension of SR-710 has a long and contentious history. A straight-line freeway connection between SR-710 and I-210 would divide the Los Angeles community of El Sereno, the City of South Pasadena, and the western portion of the City of Pasadena. In 1964, Caltrans proposed a surface freeway connection on the straight-line route, approximately following Meridian Avenue. In 1973, a federal lawsuit by the City of South Pasadena successfully challenged the approval of this project, because federal highway officials did not comply with the National Environmental Policy Act (NEPA), the federal counterpart of CEQA.

21. Between 1977 and 1981, Caltrans focused on and ultimately approved extension of SR-110 as an alternative to extension of the SR-710. However, these plans were ultimately rejected by federal highway officials.

22. In 1982, Caltrans revived plans for an SR-710 surface freeway extension, and in 1986 prepared a draft Environmental Impact Statement or EIS (the NEPA counterpart to a CEQA Environmental Impact Report or EIR) analyzing a variant of the Meridian Avenue alignment. Subsequent review by federal and state officials demonstrated that SR-710 would produce more adverse impact to historic and community resources than any other highway project still pending in the United States. For this reason the federal Advisory Council on Historic Preservation consistently opposed SR-710 until its federal and state approvals were ultimately withdrawn by the Federal Highway Administration and Caltrans.

23. In 1991, the City of South Pasadena formally requested that the environmental review process include a "low build" alternative. In 1992, a final EIS was released for review.

24. In 1993, due to concerns about impacts on historic resources in the area of the proposed extension, the final EIS was referred to the President's Council on Environmental Quality, which ruled that the EIS should evaluate a "low build" alternative. In September 1993, the City of South Pasadena formally proposed a "Multi Modal Low Build Alternative" (MMLB). This alternative would avoid the freeway extension and its significant historic and

community impacts, instead relying on signal coordination, parking management, intersection upgrades, roadway widening, improvements to the existing freeways, and construction of the nearly-parallel Gold Line light-rail route. The MMLB would also expand upon existing investments in transit infrastructure, by adding circulator and feeder buses into the Gold Line system, and encouraging more compact and community-compatible development at transit nodes along the Gold Line, rather than new automobile-dependent sprawl.

25. In 1995, the Keeper of the National Register determined that portions of El Sereno and South Pasadena through which the surface freeway would pass were (in addition to previously-identified historic neighborhoods and properties) eligible for inclusion in the National Register of Historic Places. Caltrans responded by proposing a realignment of the freeway to miss the Register-eligible district by 15 feet. This new alignment was known as the "Berkshire Shift." In December 1995, the Department of Interior withdrew its previously-stated concurrence in the project, stating the need for a Supplemental EIS to study the impacts of the Berkshire Shift on historic resources. No Supplemental EIS was ever prepared.

26. In 1996, Caltrans rejected the MMLB as inconsistent with project purpose and need, which was evaluated under an assumption that the project would result in additional freeway infrastructure.

27. In 1997, Caltrans introduced yet another freeway variant, known as the "Depressed Meridian Variation Alternative Reduced with Shift Design Variation" (DMVARSDV).

28. In 1998, the federal Environmental Protection Agency and Advisory Council on Historic Preservation announced opposition to the DMVARDSV, and requested study of a "low build" alternative in a Supplemental EIS.

29. In April 1998, the federal Secretary of Transportation issued a Record of Decision approving the project under NEPA.

30. In 1998, joined by the National Trust for Historic Preservation, the Sierra Club, and others, the City of South Pasadena brought suit in the United States District Court for the Central District of California alleging failure to comply with NEPA.

31. In July 1999, the United States District Court issued an injunction against the DMVARSDV, ruling that the EIS was flawed because of a failure to fully evaluate the MMLB and because of the impacts to historic resources. This injunction is still in place. (*South Pasadena v. Slater* (C.D. Cal. 1999) 52 F. Supp.2d 1106.)

32. In December 2003, the Federal Highway Administration withdrew its approvals of the surface freeway project, essentially endorsing the district court's rationale for issuing the injunction. In June 2004, Caltrans similarly withdrew its approval of the surface freeway project. Thus, a surface freeway is no longer actively under consideration at either the federal or state levels.

33. However, Metro is now studying the feasibility of a subsurface highway (i.e. tunnel) in lieu of a surface freeway. The environmental impacts of this latest incarnation of the SR-710 extension have not been studied. The City of South Pasadena, along with the Cities of Pasadena and La Cañada Flintridge, continue to advocate for study of the MMLB as a viable alternative to a freeway extension, though the City of South Pasadena has taken a position that it is not opposed to sound research of a tunnel alternative.

34. Despite the facts that no environmental analysis of the 710 tunnel project has yet taken place, and the feasibility study has only just begun, Metro voted on July 24, 2008 to include the 710 tunnel project for funding as part of the Sales Tax Measure to be voted on in November 2008. No later than July 24, 2008, Metro filed a Notice of Exemption of the project from CEQA.

35. This action is timely filed within 35 days of the filing of the Notice of Exemption. (Pub. Res. Code §21167(d).)

EXHAUSTION OF ADMINISTRATIVE REMEDIES AND INADEQUATE REMEDIES AT LAW

36. The $780 million for the 710 tunnel was included in Metro's expenditure plan less than a week before Metro voted upon the plan. Because the addition to the expenditure plan was noted by a South Pasadena representative the day before the vote on the plan, counsel for the City of South Pasadena sent a letter, which was presented orally and in writing to Metro

ATTACHMENT D

Letter from Advisory Council on Historic Preservation

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

March 20, 1998

The President
The White House
Washington, D.C. 20500

Dear Mr. President:

As your Advisory Council on Historic Preservation, the Congress has charged us under Section 202 of the National Historic Preservation Act of 1966, with the responsibility to advise you on matters relating to historic preservation.

We are taking the unusual step of writing to advise you about one of the most important historic preservation cases ever to come before the Council in its 32-year history. The issue is a major highway project funded by the Department of Transportation, known as the Route 710 Freeway in southern California. This freeway will cut a 4.2 mile swath through historic neighborhoods and stable communities in the Los Angeles area, destroying close to 1,000 homes. Six historic districts and numerous individual historic properties will be adversely affected by this freeway construction.

The Council has formally opposed the Route 710 Freeway project for the past fifteen years. In fact, never before has any single project generated such a consistent response from the members of the Council, through three different presidential administrations. Our twenty member Council includes the heads of six Federal agencies, as well as eleven individual members appointed by you, a governor, a mayor and several ex officio members. Since 1983, this unique cross-section of experts and agency officials has been unwavering in its opposition to the Route 710 Freeway project. This opposition has been formally expressed by the Council to the Secretary of Transportation in 1983, 1984, 1989, and in 1993 through a referral of the project to the Council on Environmental Quality. Now, five years later, we have once again reiterated our concerns in a renewed set of comments.

We request that you review the attached comments, detailing our objections to the proposed freeway, which we have sent to the Secretary of Transportation. We are providing this to you as a special report under Section 202(b) of the National Historic Preservation Act and urge you to consider this issue carefully.

Based on our serious concerns about this project and its impacts on historic properties, we ask you to consider issuing two directives to the Secretary of Transportation. First, before this freeway is approved, a Supplemental Environmental Impact Statement must be prepared to afford the public an opportunity to review and comment upon the current proposed alternative. Both the Department of the Interior and the Environmental Protection Agency are on record regarding the need for such a document to be produced to meet the requirements of the National Environmental Policy Act. Second, an independent and objective analysis of a "low-build" alternative, referred to in our comments, must be conducted. If a "low-build" alternative were implemented, it would save the threatened historic resources and millions of Federal tax dollars.

We hope you will conclude, as we have, that this freeway project should not go forward. We stand ready to assist in any way we can to reach a constructive and sound solution to this critical issue.

Respectfully submitted,

Cathryn B. Slater

Cathryn Buford Slater
Chairman

ATTACHMENT E

Letter from Advisory Council on Historic Preservation

Advisory
Council On
Historic
Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

March 20, 1998

The Honorable Rodney Slater
Secretary of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

Dear Secretary Slater:

On March 13, 1998, the full membership of the Council met to review and comment on the proposed Department of Transportation approval of the California Route 710 Freeway project. This action was taken under Section 106 of the National Historic Preservation Act, which requires Federal agencies to take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment. The members agreed that, although the Federal Highway Administration had made serious attempts to mitigate the harmful effects of the project on historic properties, these impacts would be of such magnitude and extent that they could not be adequately mitigated and that unacceptable loss of important historic resources would accompany construction of the freeway project. The Council recommends the proposed alternative for the freeway, the "Depressed Meridian Variation Alternative Reduced with Shift," not be built and that further efforts be made to meet transportation needs with significantly less impact on historic properties.

Background

The California Route 710 Freeway project has been under consideration for 30 years and the Council has been involved in reviewing impacts on historic properties under Section 106 since 1973. No single Section 106 case has generated such a strong and consistent Council response over such a long period of time. The Council membership formally commented to the Secretary of Transportation three times in the last 15 years. In 1993, the Council referred the freeway project to the Council on Environmental Quality for review. This level of membership involvement is unprecedented.

Our comments, issued in 1983, 1984 and 1989, have consistently held that the "No Build Alternative" should be the preferred option if no prudent and feasible alternative is found to a massive freeway that seriously impacts the numerous historic districts and individual historic properties in the area. Each time, the Council's comments were based on review of versions of the Meridian Variation Alternative, similar in most fundamental ways to the current proposal.

In November of 1997, you prepared a proposed Record of Decision with yet another variation of the Meridian Alternative, called the " Depressed Meridian Variation Alternative Reduced with Shift." The project consists of 4.5 miles of construction for an eight-lane freeway to connect the 710 Freeway to 210 Freeway. The current proposal provides for 85% of the freeway being depressed and six cut-and-cover tunnels constructed to minimize impacts on historic properties.

The freeway's impacts on historic properties would be severe and extensive. It will sever or adversely affect six historic districts located in Pasadena, South Pasadena and El Sereno. The historic districts include Markham Place, Pasadena Avenue, Prospect Circle, South of Mission, Buena Vista, and the Shortline Villa Tract. At least 69 historic structures will be adversely affected directly through demolition, relocation or substantial alteration of their setting. Over 150 more will suffer adverse effects from their proximity to the freeway. More than 50 of those will immediately abut the freeway. There are also 11 individually National Register listed or eligible historic properties that will be adversely affected by the proposed freeway. While extensive and costly mitigation is proposed, the Council believes that the damage that will be done to these historic properties is irreparable and cannot be mitigated.

Impact on the viability of historic districts. The proposed freeway will cause a major disruption to the cohesive fabric of the affected historic districts. Insertion of a depressed freeway, removal of mature vegetation, relocation of houses, severing of through streets, construction of sound walls and the introduction of noise and visual intrusions will all irreparably alter and degrade these communities. These historic districts contain some of metropolitan Los Angeles' oldest stable neighborhood environments. While these communities have evolved with the rest of southern California, the architectural style and diversity of the residences, the contributing landscape and community cohesion have remained the same for three-quarters of a century. In Southern California, where often "newer is better", this integrity is, indeed, a remarkable fact. It is important to preserve the historic fabric of these communities and provide a more livable and hospitable environment for our future generations. There is no acceptable mitigation method that will repair the damage to community cohesion within the historic districts that will be severed or impacted by the construction and permanent presence of an eight-lane freeway.

Loss of critical landscape features. The proposed freeway will have a devastating impact on the abundant mature vegetation that is a critical defining element of the affected historic districts. It is estimated that over 6,000 mature trees of various species will be destroyed. While replacement of some of these features is proposed, the streetscapes and landscapes cannot be replicated. The age and growth rates of the new trees will not be able to recover within an adequate time frame, if at all. Likewise, the viability of successfully introducing comparable growth on top of cut-and-cover tunnels is in question. The irreplaceable loss of mature landscaping will irrevocably alter a critical element of the historic landscape. Likewise, the proposed project will destroy character-defining man-made elements such as arroyo stone walls that will be difficult, if not impossible, to replace. Uncertain fate of relocated historic properties. A total of 44 historic properties are currently proposed to be moved and relocated; 29 of these will be placed on top of the cut-and-cover tunnels after project completion. Relocation of historic structures is always a risky process at best and some of the properties being considered for moving pose serious challenges. Moving the historic buildings twice exacerbates the threat. Likewise, the idea of storing a large number of historic buildings for an unspecified amount of time raises serious concerns. Even with a high level of diligence and planning, the buildings may well be subjected to deterioration, vandalism and excessive costs of future rehabilitation.

Reintegration of moved properties into their neighborhoods. Placing the moved historic properties on top of cut-and-cover tunnels after an indefinite storage period does not guarantee successful rehabilitation of the properties themselves or restoration of the integrity of the original historic district. Assuming that the individual structures could be successfully returned to their original settings and restored, the looming question remains whether the neighborhood, the essence of the historic district, can be regained. Little experience with placing historic residential structures on cut-and-cover tunnels can be looked to as precedent. More importantly, the devastation of the existing relationship among the structures and their environment, resulting in

irreversible erosion of community cohesion and viability, raises serious questions about the likely success of this effort. If it fails, then the mitigation of project impacts is a complete failure.

Recommendations

The Council, for the fourth time in the last two decades, once again concludes that the impacts of the proposed Route 710 Freeway upon historic properties are massive and unacceptable. Unless a different alternative that avoids this degree of devastation is found, the Council recommends that the project not be approved. We believe that a "low-build" alternative may yet hold some promise for meeting the transportation purpose and need identified for this project. Questions still remain regarding the thoroughness of the development of a viable low-build alternative, as well as the degree to which such an alternative has been given a fair and objective assessment.

The Council recommends that you direct the Federal Highway Administration to seriously pursue further development and independent testing of the low-build. We would be pleased to assist in this evaluation and provide our specific views and concerns regarding the effort that has been made to date on this option.

This controversial project continues to be one of the most important preservation issues ever confronted by the Council. The magnitude of its impacts on irreplaceable historic resources is matched only by the important national policy questions the case presents. It is reminiscent of the proposed elevated freeway that would have severed New Orleans' Vieux Carre from the Mississippi River. The Secretary of Transportation abandoned that proposal, strongly opposed by the Council in 1969, saving a national treasure and setting a new standard for how the balance would be struck between transportation needs and historic preservation. As we approach the 21st Century, we believe that you should take this occasion to pursue a transportation approach that reflects the value our society now places on its cultural heritage. It would be a fitting legacy for future generations.

Sincerely yours,

Cathryn Buford Slater
Chairman

ATTACHMENT F

Letter from Felicia Marcus, Regional Administrator for EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

March 4, 1998

OFFICE OF THE
REGIONAL ADMINISTRATOR

Julie Anna Cirillo, Regional Administrator
Federal Highway Administration
201 Mission Street, Suite 2100
San Francisco, CA 94105

Dear Ms. Cirillo:

Thank you for your prompt response to my letter of January 8, 1998 in which I asked about the status of your "re-evaluation" for the **State Route 710 Project (Long Beach Freeway)**. I appreciate your thoughtful responses to my questions and the materials included with your letter. While we realize that you are continuing with the project re-evaluation, the information provided leads us to believe that the scope and significance of the issues surrounding this proposal are so compelling that a Supplemental Draft Environmental Impact Statement (SDEIS) should be prepared. We are very concerned that the project changes which are being considered have not been fully disclosed to the public as NEPA and the implementing regulations require. We are specifically troubled with the inadequacy of the Multi-Modal Low-buildalternative (the "Low-build" alternative) analysis and the significance of the impacts to historic properties.

The following describes our concerns in more detail and provides suggestions for next steps in the hope of convincing you to undertake additional analysis before proceeding.

Low-Build Analysis

In 1995, after the project was referred to the Council on Environmental Quality (CEQ), by the Advisory Council on Historic Preservation (ACHP), Caltrans and FHWA performed an analysis of a "Low-build" proposal that the City of South Pasadena had suggested in 1993. This analysis determined that South Pasadena's Low-Build proposal would not meet the purpose and need for the project.

We are concerned that FHWA's analysis of South Pasadena's Low-build proposal has not met CEQ's recommendation that one technically feasible Low-build option be examined <u>and</u> be given consideration as an alternative to the proposed action. FHWA has justified eliminating South Pasadena's Low-build proposal by stating that the proposal would not: 1) provide North-South freeway service; 2) connect two East West interstates; 3) provide an HOV link; 4) and not complete the Regional Mobility Element of the SCAG 1994 plan. None of these criteria were part of the Purpose and Need statement contained in the 1992 FEIS, which focused on reducing

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congestion by serving the local transportation needs and enhancing the opportunities to develop a mass public transportation system to serve the study area. It is unrealistic to evaluate a non highway (Low-build) alternative against a set of highway oriented criteria and eliminate it because it doesn't show a significant benefit for highway trips.

We are even more concerned that Caltrans and FHWA did not find merit in proposing modifications to South Pasadena's proposal that would establish what both agencies could consider to be a technically feasible "Low-build" alternative. Our belief is that it is possible to construct a feasible alternative that meets the Purpose and Need of relieving congestion and providing transportation improvements. Caltrans and FHWA determined in 1994 that the Low-build alternative would not meet the transportation needs for the area, making it technically infeasible, yet continued to examine that proposal without augmentation. The proposal suggested by South Pasadena may not have met all of the highway oriented criteria, however there has apparently never been any attempt to develop other transportation segments, or undertake changes in the local infrastructure, modifying the original South Pasadena recommendation. We believe that the Low-build proposal demonstrates enough of a potential to relieve congestion and offer opportunities to develop transit in the area that with modifications and improvements, can prove itself to be "technically feasible," and capable of meeting the purpose and need as stated in the 1992 FEIS.

The data and analysis presented in the Low-build analysis report is questionable in many respects. For instance, we find it difficult to understand why FHWA implies that the Low-build alternative would, in some cases, have a lower performance than the No-build alternative. In addition, it is apparent from the report that:

- the model was not run repeatedly to refine the analysis as is normally done for all proposed highway and freeway projects;

- the report did not clearly disclose all of the proposal's elements such as transit and traffic calming, e.g., efforts which would be imposed on streets such as Fremont or Orange Grove, nor did the report indicate why such measures are nonetheless being proposed for arterials that already handle a large amount of traffic, and;

- the report disclosed nothing about the vehicle capacity and volumes on local streets and freeway segments to give a quantitative description of whether the additional average daily trips in both Build and Low-build scenarios would cause a significant drop in levels of service for key intersections.

Based on the information which is available as well as that which is lacking, we feel as though the Low-Build alternative has not been afforded consideration on par with the other alternatives. Even so, it is evident from the information available that the Build alternative will not substantially relieve congestion by serving the local transportation needs or by enhancing opportunities for a public transit system. For example, while several of the local streets show a reduction of average daily trips in the build scenario over the low build, they will remain in congested conditions. Similarly, with the Build alternative, the greatest improvement being

shown for the highway network is on I-5 with a 6% reduction in vehicles per day. This would be offset by the substantial increase of nearly 200,000 vehicles per day in the 710 corridor, vehicles attracted by the new capacity of the facility, which then carries over to significant increases in traffic volumes on the 210 and 710 freeways. The analysis of the Build alternative states that this alternative will serve trips that generate up to 75 miles away, whereas the Low-build serves trips generated 25 miles away. How then does the Build alternative achieve the purpose of reducing congestion and serving local transportation needs? The Build alternative also does very little to enhance or develop transit measures in the study area and only shows an increase of 1,000 HOV trips for a facility that will handle 190,000(+) vehicle trips per day, whereas, the Low-build alternative would: decrease vehicle miles travelled, since trips are not generated 75 miles away; decrease the amount of air pollution in the study area; should, in reality, produce a greater transit ridership; and has a reasonable amount of traffic service no worse than in the No Build. Based upon the comparative analysis, between the Low-build and the Build alternatives, we believe that the Low-build proposal demonstrates enough of a "benefit" to the study area that another Low-build alternative, with more "technically feasible" aspects, should be evaluated using different assumptions about street improvement efforts and trip patterns and types.

Interim "Highway" Improvements

FHWA suggests several Interim Highway Improvements in the Preliminary Record of Decision. Interestingly, they are all components of the Low-build alternative. We are surprised that FHWA would suggest almost all of the arterial street improvements of the Low-build proposal but not evaluate them as a full alternative for examination. We also note that none of the proposals of the interim improvements had undergone NEPA review but that they would do so at sometime in the future.

We strongly disagree with this approach and instead propose that any mitigation measures or interim improvements that FHWA has not analyzed as part of the preferred alternative should be evaluated in a new SDEIS. This is especially crucial in instances where there has been no opportunity for formal public review and input. The Record of Decision (ROD) is not the appropriate document to bring forth measures, concepts, options, etc. which have not undergone full public disclosure in pre-decision making documents such as the Draft and Final EIS, especially if those measures are central to the proposed project and in all likelihood demand future NEPA documents. It is particularly troublesome in this instance that the measures in question are all contained in the Low-build alternative that stakeholders and the public have asked FHWA to analyze as a complete alternative in a Environmental Impact Statement.

The new Meridian Variation Alternative

It has been six years since the Final EIS and more than ten since the last DEIS, where FHWA has disclosed and examined the project's impacts. The preliminary Record of Decision describes Caltrans and FHWA's efforts to modify and reduce the impacts of the project by discussing the Depressed Meridian Variation Alternative Reduced with Shift Design variation as the preferred alternative (new Meridian Variation). The new Meridian Variation "preferred" alternative differs from the previous FEIS preferred alternative by having 4, possibly 5, additional

cut and cover tunnels, depressing an additional 30% of the roadway, removal of the interchange to Route 110, a reduced footprint of 34 feet, removal of a rail right of way, and several interim highway improvements.

In the briefing package to the Advisory Council on Historic Preservation, FHWA stated in its conclusion that "FHWA firmly believes that the alternative proposed for selection in the ROD is so *fundamentally different* (emphasis added) from the 1992 FEIS preferred alternative that a referral to CEQ is no longer warranted." We agree that the alternative proposed for selection in the ROD is fundamentally different from the 1992 FEIS preferred alternative. Absent any other issues at question, that acknowledged "fundamental difference" in and of itself supports the preparation of a Supplemental Draft Environmental Impact Statement (SDEIS) for this project.

We are also concerned that FHWA states in the preliminary ROD that one of the cut and cover tunnels may not be technically feasible and that the issues would need to be reexamined should further engineering and design show those tunnels to be infeasible. We strongly believe that FHWA should know now, with far greater certainty, whether or not a cut and cover tunnel that is proposed as mitigation for significant impacts to a community is going to be feasible or not. These issues should be clearly understood, so as to avoid further community disruption at the time of construction and laying down pavement for a facility. Therefore, these issues should be addressed in a SDEIS, allowing FHWA to collect all of the necessary information to definitively state whether or not cut and cover tunnels can be constructed for the intended locations.

The last several years has seen several complex issues emerge as part of the review analysis of the project and its impacts. Those issues and their conclusions have not been addressed in a complete and cohesive NEPA document. We recommend that the following be addressed in detail in such a document:

- The SDEIS should provide an evaluation of a technically feasible Low-build alternative. If FHWA is going to proceed with the Interim Highway Improvements, then the impacts from proposing those must definitely be included. In fact, FHWA should seriously reconsider proceeding to the ROD before providing a complete impacts analysis of those measures. NEPA guidance states that no mitigation measures should be proposed in a Record of Decision that had not previously been presented and commented on at least in the Final EIS.

- FHWA should revisit the purpose and need for the project. The current preferred alternative doesn't appear to meet all of the 1992 FEIS purpose and need requirements, particularly enhancing the development of transit to serve the study area, and serving the local existing and future transportation needs. The 1992 FEIS also discussed other alternatives that have similar aspects as those in the new Meridian Variation alternative but were eliminated from consideration for containing those very aspects. The SDEIS should contain a renewed analysis of those alternatives.

- The SDEIS should discuss the direct and indirect impacts from the construction and operation of the 4-5 additional cut and cover tunnels, the removal and replacement of

Historic Properties, conformance with the Regional Transportation Plan and Transportation Improvement Program and the impacts to air quality. The SDEIS should contain a discussion of the indirect and cumulative effect of the preferred alternative promotion of extended commute trips.

All of the issues identified herein outline a compelling rationale for FHWA to seriously consider producing a Supplemental DEIS to disclose all of the project alternatives, actions, impacts, and mitigation measures. I am aware that FHWA has spent significant time in developing consensus among the stakeholders and that you have weighed their comments carefully. With that effort as a foundation, a SDEIS would provide the stakeholders and the public with the opportunity to review and comment on all of the current relevant information, and to examine the changes to the proposals. We believe this will inevitably save time in the long run. EPA would be pleased to assist your agency's efforts to expedite the NEPA process.

Please feel free to give me a call at 415-744-1001, or Dave Carlson of my staff at 415-744-1577.

Yours,

Felicia Marcus

Felicia Marcus
Regional Administrator

cc: Jeffrey R. Brooks, FHWA, San Francisco
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ATTACHMENT G

Study of Ultrafine Particles Near a Major Highway with Heavy-Duty Diesel Traffic

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Study of ultrafine particles near a major highway with heavy-duty diesel traffic

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Abstract

Motor vehicle emissions usually constitute the most significant source of ultrafine particles (diameter $<0.1\,\mu m$) in an urban environment. Zhu et al. (J. Air Waste Manage. Assoc., 2002, accepted for publication) conducted systematic measurements of the concentration and size distribution of ultrafine particles in the vicinity of a highway dominated by gasoline vehicle. The present study compares these previous measurements with those made on Interstate 710 freeway in Los Angeles. The 710 freeway was selected because more than 25% of the vehicles are heavy-duty diesel trucks. Particle number concentration and size distribution in the size range from 6 to 220 nm were measured by a condensation particle counter and a scanning mobility particle sizer, respectively. Measurements were taken at 17, 20, 30, 90, 150, and 300 m downwind and 200 m upwind from the center of the freeway. At each sampling location, concentrations of carbon monoxide (CO) and black carbon (BC) were also measured by a Dasibi CO monitor and an Aethalometer, respectively. The range of average concentration of CO, BC and total particle number concentration at 17 m was 1.9–2.6 ppm, 20.3–24.8 $\mu g/m^3$, 1.8×10^5–$3.5\times10^5/cm^3$, respectively. Relative concentration of CO, BC and particle number decreased exponentially and tracked each other well as one moves away from the freeway. Both atmospheric dispersion and coagulation appears to contribute to the rapid decrease in particle number concentration and change in particle size distribution with increasing distance from the freeway. Average traffic flow during the sampling periods was 12,180 vehicles/h with more than 25% of vehicles being heavy-duty diesel trucks. Ultrafine particle number concentration measured at 300 m downwind from the freeway was indistinguishable from upwind background concentration. These data may be used to estimate exposure to ultrafine particles in the vicinity of major highways.
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Keywords: Ultrafine particles; Freeways; Diesel; Carbon monoxide; Black carbon

1. Introduction

Epidemiological data from air pollution studies have shown a consistent relationship between increases in particulate matter (PM) exposure and contemporary increases in mortality and morbidity (Schwartz, 1991; Dockery et al., 1993; Pope et al., 1995; Vedal, 1997). However, the underlying biological causes of the health effects of PM exposure and the correct measurement metric are unclear. For example, it is not clear whether the mass concentration (Osunsanya et al., 2001) or the number concentration (Peters et al., 1997; Penttinen et al., 2001) is most important in causing these adverse

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PM health effects. Currently, there are several hypotheses used to explain the association of PM and observed adverse health effect. One argues that particle surface contaminants, such as transition metals, contribute towards ill health (Fubini et al., 1995; Gilmour et al., 1996), wherein the ultrafine particles are thought to act as vehicles for those contaminants, initiating local lung damage when the particles deposit on the epithelial surfaces. Another hypothesis is that the physical characteristics (e.g. number, size, shape, aggregation properties) are important in producing health effects (Bérubé et al., 1999). Particle shape and size are critical factor controlling where the inhaled particles deposit in the various regions of human respiratory system by the complex action of aerosol deposition mechanisms (Hinds, 1999).

Recent toxicological studies have concluded that ultrafine particles (diameter <100 nm) are more toxic than larger particles with the same chemical composition and at the same mass concentration (Ferin et al., 1990; Oberdörster, 1996, 2001; Donaldson et al., 1998, 2001; Churg et al., 1999; Brown et al., 2000). Currently, however, only the mass concentration of PM $<10\,\mu$m in aerodynamic diameter (PM_{10}) and $<2.5\,\mu$m ($PM_{2.5}$) are regulated. Information about ultrafine particles is usually not available. In fact, even though ultrafine particles represent over 80% of particles in terms of number concentration in an urban environment (Morawska et al., 1998a, b), the less numerous but much heavier particles of the accumulation (0.1–$2\,\mu$m) and coarse (2.5–$10\,\mu$m) modes dominate mass concentration measurements. Thus, number concentration, together with the size distribution of ultrafine particles, is needed to better assess ambient air quality and its potential health effects.

Emission inventories suggest that motor vehicles are the primary direct emission sources of fine and ultrafine particles to the atmosphere in urban areas (Schauer et al., 1996; Shi et al., 1999; Hitchins et al., 2000). Although traffic-related air pollution in urban environments has been of increasing concern, most studies have focused on gaseous pollutants, total mass concentration, or chemical composition of particulate pollutants (Kuhler et al., 1994; Clairborn et al., 1995; Williams and McCrae, 1995; Janssen et al., 1997; Roorda-Knape et al., 1998a, b; Wrobel et al., 2000). Booker (1997) found that particle number concentration was strongly correlated with vehicle traffic while PM_{10} was essentially uncorrelated with traffic. Since the majority of particle number from vehicle exhaust are in the size range 20–130 nm for diesel engines (Morawska et al., 1998a, b) and 20–60 nm for gasoline engines (Ristovski et al., 1998), it is important and necessary to quantify ultrafine particle emission levels, and to determine ultrafine particle behavior after emission as they are transported away from the emission source—busy roads and freeways.

Morawska et al. (1999) measured the horizontal and vertical profiles of submicrometer particulates (16–626 nm) near a major arterial route in the urban area of Brisbane, Australia. They found, with the exception of measurements in close proximity to the road (about 15 m), that the horizontal ground-level profile measurements did not show statistically significant differences in fine particle number concentration for up to 200 m distances away from the road. Hitchins et al. (2000) examined the particle size distribution and concentration in the size range from 15 nm to 20 μm at distances from a road ranging from 15 to 375 m at two sites in Australia. They conducted measurements under different wind conditions and found that when the wind is blowing directly from the road, the concentration of the fine and ultrafine particles decayed to about half of their maximum at a distance of 100–150 m from the road. Shi et al. (1999) measured ultrafine particle number concentrations and size distributions at a busy roadside and at nearby urban background sites in Birmingham, United Kingdom. They observed a faster decline of particle number concentration than mass concentration. In a recent study, Shi et al. (2001) reported that the fraction of particles <10 nm represents more than about 40% of the total particle number concentrations at 4 and 25 m from the roadside curb.

While there have been recent studies of ultrafine particles from traffic in other countries, except for Zhu et al. (2002), no comparable work has been done in the Los Angeles basin, a home to more than 15 million individuals and 10 million vehicles contributing to daily traffic. Previous studies have shown that meteorological conditions may affect substantially the characteristics of PM emitted from vehicles. Kittelson et al. (2001) found in their on-road PM measurements that the concentration of particles in the nuclei mode increases by nearly a factor of 10 as the (air) temperature is reduced from 25°C to 15°C. This observation suggests that there could be significant differences in the tendency to form semi-volatile nanoparticles between, for example, northern Europe and Southern California.

Zhu et al. (2002) conducted a systematic ultrafine particle study near one of the busiest freeways in the Los Angeles basin, Interstate 405. Traffic on that freeway was dominated by gasoline-powered cars and light trucks, with $<5\%$ of vehicles being heavy-duty diesel trucks. In the US, spark ignition vehicles usually account for most of the vehicles operating on highways. However, since diesel vehicles emit more PM on a fleet averaged, gram-per-vehicle mile mass basis (Kittelson et al., 2001), and that diesel engine exhaust has been proposed as carcinogen in animals and probably carcinogenic for humans (IARC, 1989), it is necessary and timely to conduct a comprehensive study of ultrafine particles in the vicinity of a diesel vehicle dominated freeway. Thus, the aim of the present paper is

to systematically evaluate ultrafine particles in the vicinity of the 710 freeway in the Los Angeles basin, a freeway where more than 25% of vehicles are heavy-duty diesel trucks. Particle number concentration and size distribution in the size range from 6 to 220 nm are measured along with CO and black carbon (BC) as a function of distances upwind and downwind the 710 freeway. The results from the current study are compared to these by Zhu et al. (2002) which were obtained near the 405 freeway.

2. Experimental

2.1. Description of sampling site

This study was conducted in the City of Downey along Southern Avenue between 30 August and 27 October 2001. The location was chosen for its proximity to the freeway and the lack of other nearby ultrafine particle emission sources. Southern Avenue is located perpendicular to Interstate 710 Freeway and Garfield Avenue near the Los Amigos Country Club. Freeway 710 runs generally north and south near the sampling site and parallels the Los Angeles River.

This location is ideal for this study for several reasons. First, there are no other major roadways near the sampling sites along Southern Avenue. Second, businesses along Southern Avenue generally have large open land areas with little activities during the day. Thus, there is minimal local traffic influence at the sampling locations. Third, the freeway is at the same elevation as Southern Avenue. The only separation between the freeway and Southern Avenue is a metal chain link fence along the freeway. This allowed measurements as close as 3 m from the edge of the freeway. Fourth, a nearby residential area approximately 200 m upwind from the freeway was easily accessible for sampling.

During the sampling period, a fairly consistent eastward wind developed each day starting at approximately 11:00 AM. This wind carried the freeway vehicular emissions directly to the sampling location. The 710 freeway has eight lanes, four north bound and four south bound. It is approximately 26 m wide including a 1-m-wide median strip. Measurement site locations for this study were designated by their distance from the center of the median strip. Thus, the distance from each sampling location to the nearest traffic lane is 13 m less than the indicated distance.

Freeway 710 is a major truck route in Southern California with a large percent of the traffic consisting of heavy-duty diesel trucks. During the sampling period, traffic density ranged from 180 to 230 vehicles/min passing the sampling site, total for both directions, with approximately 25% of the vehicles being heavy diesel trucks.

2.2. Sampling and instrumentation

Wind speed and direction were measured at a fixed site 6 m above the ground level 20 m downwind of 710 freeway, which also served as a particle number concentration control site. Wind data were averaged over 1 min intervals and logged into a computerized weather station (Wizard III, Weather Systems Company, San Jose, CA). Throughout each measurement period, the traffic strength on the freeway, defined as number of vehicles passing per minute, was continuously monitored by a video recorder (camcorder), which captures all eight lanes of the freeway. After each sampling session, the videotapes were replayed and traffic density counted manually. Three 1-min samples were randomly selected from each 10-min interval. Cars, light trucks, and heavy-duty trucks were counted separately to estimate the traffic density by type of vehicle.

Particle number concentration and size distribution in the size range from 6 to 220 nm were measured by a condensation particle counter (CPC 3022A; TSI Inc., St. Paul, MN) and a scanning mobility particle sizer (SMPS 3936, TSI Inc., St. Paul, MN). The sampling flow rate of the SMPS was adjusted to 1.5 lpm in order to measure particles as low as 6 nm as well as to minimize the diffusion losses of ultrafine particles during sampling. Flexible, conductive tubing (Part 3001940, TSI Inc., St. Paul, MN) was used for sampling to avoid particle losses due to electrostatic forces. The sizing accuracy of the SMPS was verified in the laboratory by means of monodisperse polystyrene latex spheres (PSL, Polysciences Inc., Warrington, PA). Data reduction and analysis of the SMPS output was done by the Aerosol Instrument Manager software (version 4.0, TSI Inc., St. Paul, MN). Measurements were taken at 17, 20, 30, 90, 150, and 300 m downwind and 200 m upwind from the center of the freeway 710. At each location, three size distribution samples were taken in sequence with the SMPS. Scanning time for each was 180 s.

In addition to size distribution and the total number concentration, the concentrations of BC and carbon monoxide (CO), were monitored simultaneously at each sampling location. Before each measurement session, all instruments were time synchronized. Data were averaged after collection over the time periods corresponding to the scanning intervals of the SMPS. A Dual Beam Aethalometer (Model AE-20, Andersen Model RTAA-900, Andersen Instruments Inc., Smyrna, GA) was used to measure the BC concentrations every 5 min. Concentrations of CO were measured by a near-continuous CO monitor (Dasibi Model 3008, Environmental Corp., Glendale, CA) every minute. The CO monitor was calibrated by means of standard CO gas (RAE systems Inc., Sunnyvale, CA) in the laboratory and automatically zeroed each time the power was turned on.

Electric power for the control site CPC and Weather Station was obtained by an extension cord to a nearby office. Electric power for other sampling instruments at the sampling locations was supplied by a 1.2 kW gasoline-powered portable power generator (Model EU 1000i, Honda Motor Co., LTD., Tokyo, Japan). The generator was placed approximately 50 m downwind of each sampling location. Both total particle number and CO concentrations were measured at the control site with the generator turned on and with it turned off. No detectable difference was observed.

Table 1 gives the sampling dates and times and summarizes the instruments that were used on each date. The weather station and control CPC were placed at the 20 m downwind control site and sampled throughout the sampling period each day. All other applicable instruments were moved together and sampled simultaneously at each sampling location. It takes about 10 min to complete sampling at each location and 120 min to complete a set, all six locations. Three to four sets were performed on each sampling date.

3. Results and discussion

The results presented below include measurements of total particle number concentrations by a control CPC, wind velocity by a Weather Wizard III, both positioned at a fixed location 20 m downwind of the freeway; and CO, BC concentration, and ultrafine particles size distributions upwind and at six downwind distances from freeway 710.

3.1. Wind effects

Changes in wind conditions have been reported to modify dramatically the pattern of total particle number concentration versus distances from a major road (Hitchins et al., 2000). Consistency in wind speed and direction allows data from different days to be averaged together (Zhu et al., 2002). Wind speed and direction were measured, averaged and logged over every 1-min interval throughout each sampling period. One hundred wind data points were randomly selected out of more than 5000 observations from all the sampling dates and plotted in Fig. 1. The orientation of freeway 710 and the sampling road, Southern Avenue, are also shown in the Fig. 1. The Weather Wizard III instrument recorded wind direction at a 22.5° interval (e.g. 11.25° on either side of N, NNE, etc.) and wind speed at 0.4 or 0.5 m/s intervals. In the figure, duplicate observations were spread out slightly in both directions to better illustrate how strong the wind was and how often the wind came from certain directions. Based on all 5000 observations, the percent of sampling time that the wind came from each 22.5° segment is also shown in Fig. 1. As shown in Fig. 1, about 80% of the time, the wind was coming directly from the freeway towards the sampling road with a speed <3 m/s. The consistency of observed wind direction and speed is a result of a generally low synoptic wind velocities and a consistent sea breeze in the sampling area.

In this study, we found that not only wind direction, but also wind speed, played an important role in determining the characteristics of ultrafine particles near the 710 freeway, similar to the observations made by Zhu et al. (2002) near the 405 freeway. However the pattern of total particle number concentrations as a function of wind speed is somewhat different for the two studies. Fig. 2 shows total particle number concentrations measured by the control CPC, located 20 m downwind of the 710 freeway versus wind speed. Averaged data for the 405 freeway from Zhu et al. (2002) are also plotted for comparison. The CPC was programmed to archive averaged total particle number concentrations at 1-min interval in synchronization with the averaging time of the meteorological data. Only wind data within $\pm 22.5°$ of normal to the freeway was used in this figure which accounts for more than 60% of the total observations. The difference between the absolute value of total particle number concentration is due in part to the difference in the sampling distance. The control CPC was located 20 m downwind from the 710 freeway but 30 m from the 405 freeway. Assuming the fitted exponential decay characteristics of ultrafine particles holds right to the edge of the freeway, it is thus

Table 1
Sampling dates, time and instruments used

Date	Time	Weather Wizard III	Control CPC	SMPS	CO monitor	Aethalometer
08/30/01	10:00–15:30	×	×	×	×	×
09/05/01	10:30–16:00	×	×	×		
09/21/01	10:00–15:00	×	×	×	×	×
09/25/01	10:30–16:00	×	×	×	×	×
10/05/01	10:30–16:00	×	×	×	×	×
10/24/01	10:00–15:30	×	×		×	×
10/30/01	10:00–15:30	×	×	×		

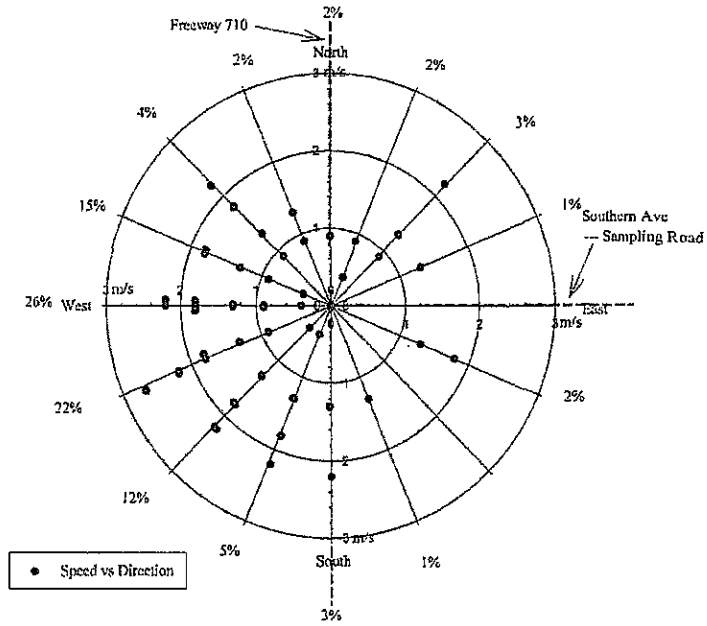

Fig. 1. Wind direction and speed at sampling site.

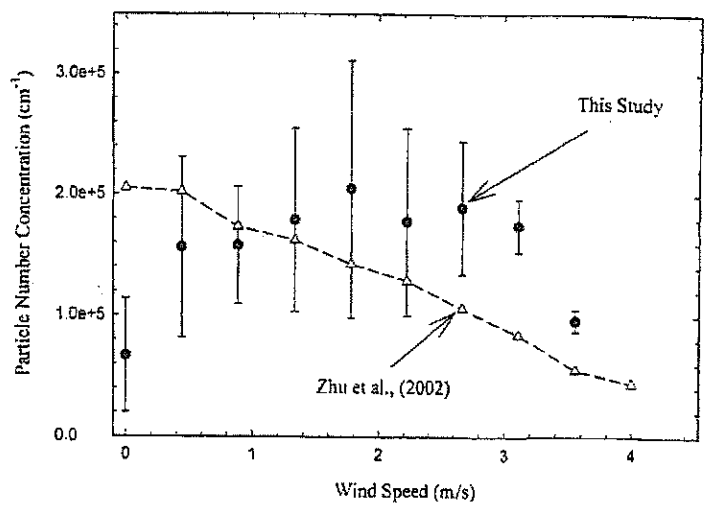

Fig. 2. Total particle number concentration measured by CPC located at 20 m downwind from freeway 710 versus wind speed. Bars indicate one standard deviation.

not surprising, as discussed below, that the CPC will read a greater total particle number concentration at 20 m in the present study than at 30 m in that by Zhu et al. (2002), given similar traffic load on both freeways. However, the relative particle number concentration as function of wind speed are somewhat different in these two studies. The relative particle number concentration decreased as the wind speed increased near the 405 freeway. In contrast, particle number concentration in the 710 freeway first increases, reaches a maximum around 1.5 m/s, and then decreases. There is no obvious explanation for the observed difference. In both studies, data showed large error bars, and the data of low wind speed (< 1 m/s) were very limited. In addition, the 405

freeway is elevated approximately 4.5 m above the surrounding terrain, while, the 710 freeway is at ground level, the same as the sampling location. Lower speed wind would be expected to cause less atmospheric dilution, and thus lead to greater particle number concentrations, as Zhu et al. (2002) reported. However, at extremely low wind speeds, it would take a considerably longer time for the wind to carry particles to the sampling port of the CPC, which gives ultrafine particles more time to coagulate with either themselves or with larger particles, a phenomenon that would decrease the total particle number concentration. This may partially explain the observed "n" shape curve in the current study.

3.2. Traffic effects

The portion of freeway 710 passing through the City of Downey is a major truck shipping route. The average traffic volume per hour during the measurement period was: 8730 cars, 870 light trucks, 2580 heavy trucks, and 12180 total vehicles. It is apparent from these numbers that diesel emission vehicles on the 710 freeway represent about 30% of vehicles while on the 405 freeway they represent <5% (Zhu et al., 2002). Fig. 3 compares the traffic volume on both the 405 and the 710 freeways. Error bars represent one standard deviation. It is seen that the 710 freeway has about 7 times as many diesel vehicles and 70% of gasoline vehicles as the 405 freeway. The total vehicle numbers on both freeways are quite similar 12,180 versus 13,900/h for the 405 freeway.

Zhu et al. (2002) reported that a traffic slowdown on freeway 405 was associated with a drop in total particle number concentration indicating that fewer ultrafine particles are emitted during such events. In this study, the traffic speed on the 710 freeway stayed constant through out the sampling period. No traffic slow down was observed. The difference in the variability of traffic volume on both freeways is indicated by the error bars in Fig. 3.

Zhu et al. (2002) reported that both wind speed and traffic density affected the characteristics of ultrafine particles near the 405 freeway, and the control CPC responded to these effects reasonably well. Thus, subsequent data for ultrafine particle analysis at increasing distances from the freeway were all normalized to the control CPC's reading. An average CPC reading, $\overline{C_N}$, was obtained based on all the measurements. In Figs. 4–6, number concentration and size distribution data were scaled to $\overline{C_N}$ by dividing each measurement by the ratio of CPC reading for the period of measurement to $\overline{C_N}$.

3.3. Change in ultrafine particle size distribution with increasing distance

Fig. 4 depicts ultrafine particle size distributions at 17, 20, 30, 90, 150 and 300 m downwind and 300 m upwind of freeway 710. The size distributions are smoothed and shown together with common scales for both axes. The horizontal axis represents particle size on a logarithmic scale, while the vertical axis represents normalized particle number concentration in the size range of 6–220 nm as measured by the SMPS. Data were averaged for all applicable sampling dates for each distance from the freeway. As shown in Fig. 4, ultrafine particle size

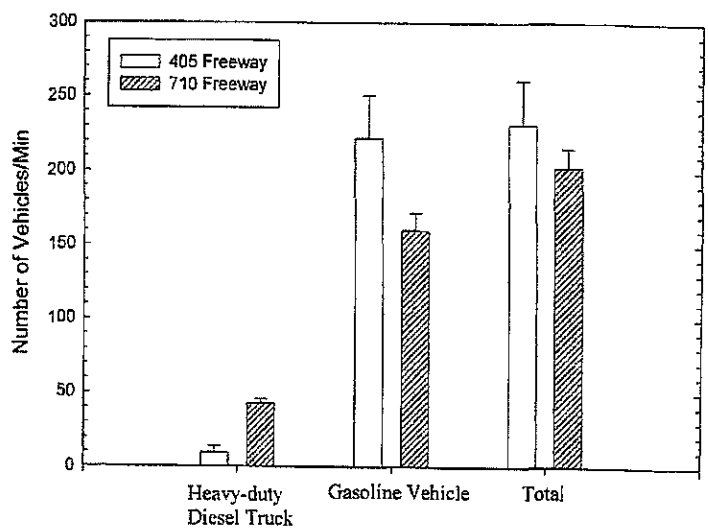

Fig. 3. Traffic volume comparison for the 405 and 710 freeway. Bars indicate one standard deviation.

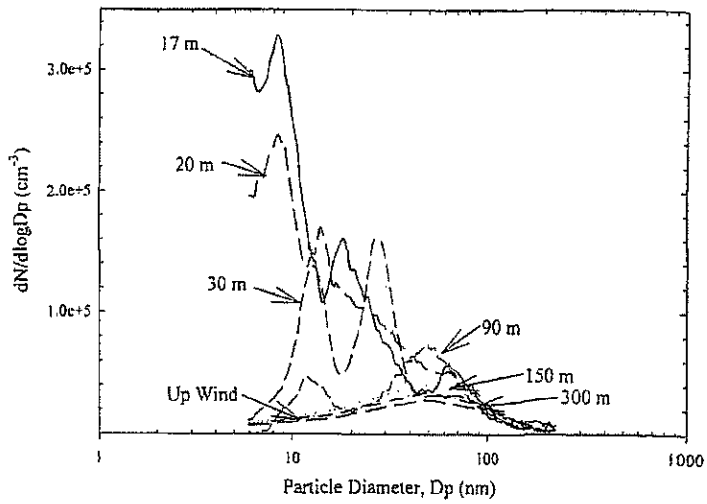

Fig. 4. Ultrafine particle size distribution at different sampling locations near the 710 freeway.

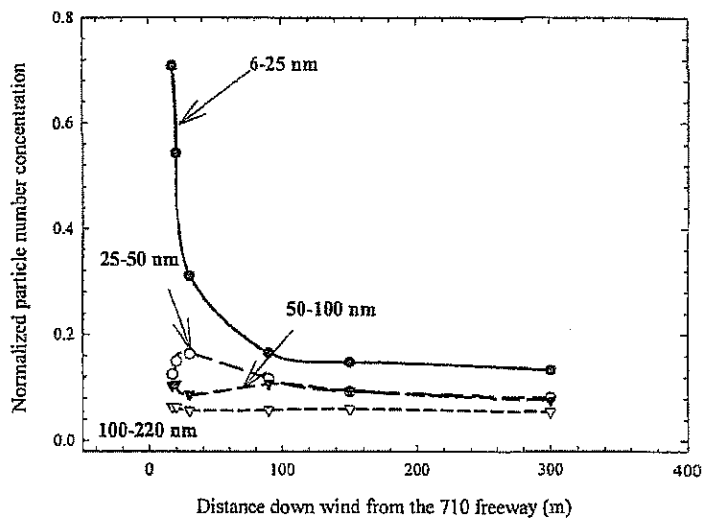

Fig. 5. Normalized particle number concentration for different size ranges as a function of distance from the 710 freeway.

distribution changed markedly and its number concentration dropped dramatically with increasing distance. At the nearest sampling location, 17 m downwind from the center of the freeway, the dominant mode was around 10 nm with a modal concentration of more than $3.2 \times 10^5/cm^3$. This mode remained at 10 nm for the second sampling location, 20 m downwind from the freeway, but its concentration dropped to $2.4 \times 10^5/cm^3$. It shifted to larger size range and its concentration kept decreasing for farther sampling locations. This mode was not observed at distance > 150 m downwind from the freeway. The dramatic decrease of particle number concentration in the size range around 10 nm was likely due to atmospheric dilution and several atmospheric aerosol particle loss mechanisms that favor small particles, diffusion to surfaces, evaporation, and coagulation. The smaller the particle, the greater its diffusion coefficient and its Brownian motion. Particles of 10 nm diffuse about 80 times faster than particles of 100 nm (Hinds, 1999). As particle size gets smaller, the Kelvin effect becomes more important, making it easier for molecules to leave the particle's surface by evaporation. In addition, when two small particles collide due to their Brownian motion (coagulate), they form a bigger particle. Thus, coagulation reduces number concentrations and shifts the size distribution to larger sizes.

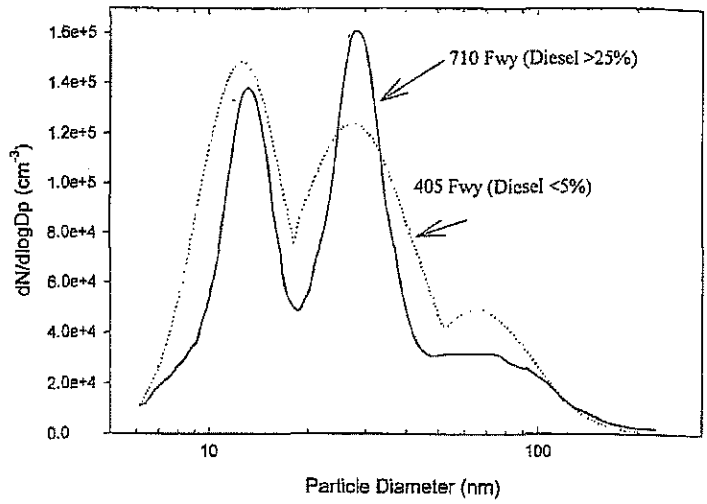

Fig. 6. Comparison of ultrafine particle number concentration at 30 m downwind from 405 and 710 freeway.

In Fig. 4, the second mode at 17 m downwind from the freeway was around 20 nm with a concentration of $1.5 \times 10^5/cm^3$. This mode remained at similar size range and concentration for the next sampling location, 20 m, but shifted to 30 nm at 30 m downwind from the freeway. It is of particular note that, while the concentration for the primary mode, 10 nm mode, decreased about 60% of its maximum value from 17 to 30 m with a slight shift in its mode, the 20 nm mode concentration did not change significantly but the modal size shifted noticeably. This second mode continued to shift to larger sizes with increasing distance from the freeway. In general number concentrations for smaller particles, $d_p < 50$ nm, dropped significantly with increasing distances from the freeway, but for larger ones, $d_p > 100$ nm, number concentrations decreased only slightly. These results are in excellent agreement with what Zhu et al. (2002) reported for freeways impacted mostly by gasoline vehicles, which suggests that coagulation is more important than atmospheric dilution for the smallest ultrafine particles and vice versa for large particles. Ultrafine particle concentrations measured at 150 and 300 m downwind of the 710 freeway were statistically within the variation of the 300 m upwind background concentration. The maximum number concentration that was observed next to the freeway was about 30 times greater than that for the background location. This suggests that people who live or work within 100 m downwind of major traffic sources, or spend a substantial amount of time commuting on such highways, will have a much higher ultrafine particle exposure than those who do not. This result can be used in epidemiological studies to estimate exposure to ultrafine particles.

Based on Fig. 4, it is clear that vehicle-emitted ultrafine particles of different size ranges behave quite differently in the atmosphere. Zhu et al. (2002) showed the decay of ultrafine particle number concentrations in four size ranges 6–25, 25–50, 50–100 and 100–220 nm. They found coagulation played a significant role in modifying the particle size distribution of vehicle-emitted ultrafine particle downwind of a freeway. Fig. 5 was prepared in the same ways as Zhu et al. (2002). The measured particle number concentrations in each SMPS size bin were combined in the corresponding size range, and the result was normalize to averaged wind speed. The general trends of sub-grouped ultrafine particle decay curves are quite comparable to those given by Zhu et al. (2002), Figs. 7a and b. Total particle number concentration in the size range of 6 to 25 nm accounted for about 70% of total ultrafine particle number concentration and dropped sharply, by about 80%, at 100 m, and leveled off after 150 m. Overall, it decayed exponentially through out the whole measured distance. Number concentrations in the next two size ranges 25–50 and 50–100 nm, all experienced a shoulder between 17 and 150 m. These results are in excellent agreement with what Zhu et al. (2002) observed and can be explained by particles, in smaller size ranges, coagulating with these particles to increase their size.

Fig. 6 compares the ultrafine particle size distributions at 30 m downwind from the 710 and the 405 freeways. Three-mode lognormal fitting was used for 405 freeway. Raw data were smoothed by averaging for 710 freeway. Heavy-duty diesel trucks on the 710 freeway represent more than 25% of traffic while on the 405 freeway they represent <5% (Zhu et al., 2002). Average PM emission rate for heavy-duty diesel trucks is about 0.4 g/mi (California ARB, 2000) while for passenger cars is

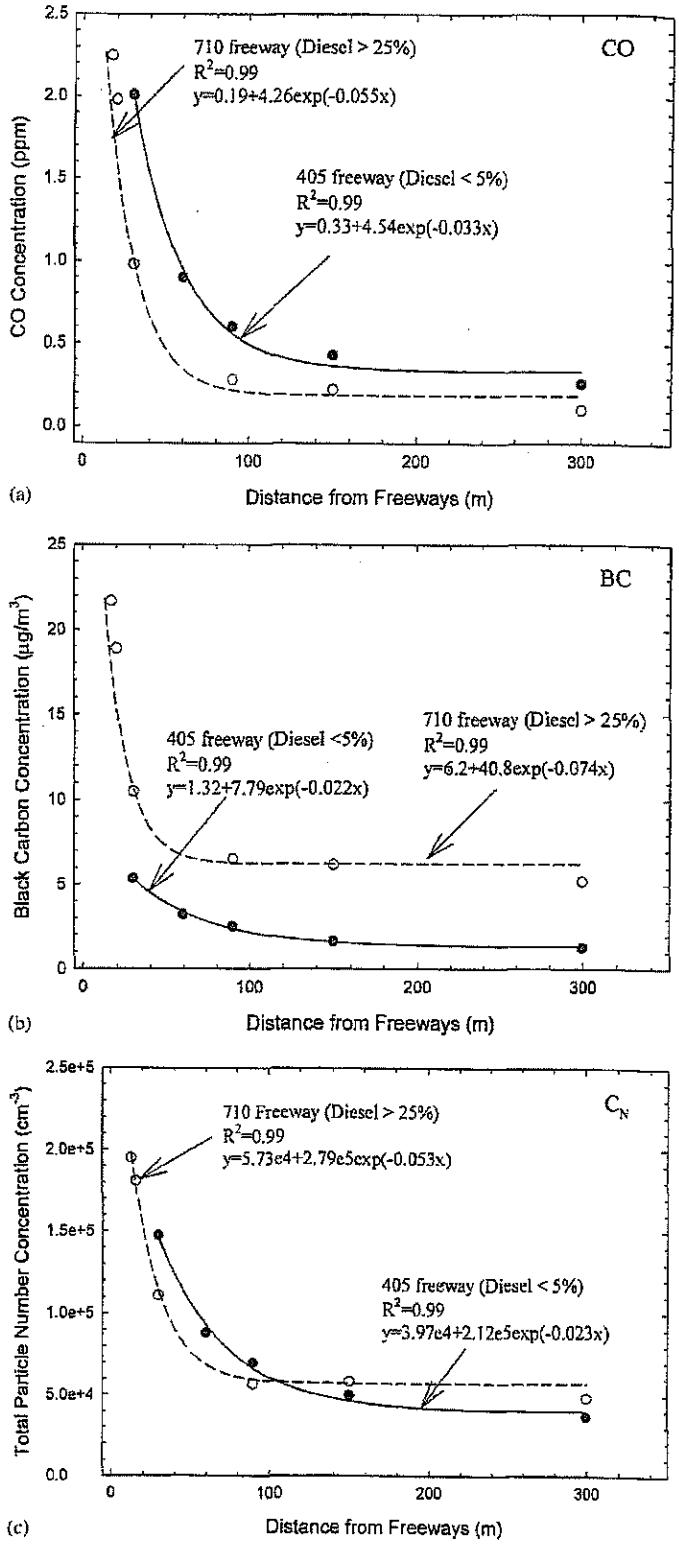

Fig. 7. Decay curves of: (a) CO, (b) BC and (c) particle number concentration near the 405 and 710 freeway.

about 0.08 g/mi (EPA, 2000). Thus, on the 710 freeway, about 60% of PM emission is due to heavy-duty diesel trucks $((0.25 \times 0.4)/(0.25 \times 0.4 + 0.75 \times 0.08) = 62.5\%)$. In Fig. 6, both size distributions have three distinct modes. The concentration for the first mode, between 10 to 20 nm, is slightly higher near the 405 freeway. This mode is likely to arise from homogeneous nucleation of semi-volatile materials and is similar to that previously reported for direct laboratory measurement of gasoline vehicle emissions (Ristovski et al., 1998). The concentration for the second mode, around 30 nm, is about 30% higher near the 710 freeway than that near the 405 freeway. This mode probably comprises mainly of BC and is likely due to the much higher diesel emissions on the 710 freeway. The last mode, around 70 nm, represents an insignificant contribution to number concentrations for these two freeways and in both cases are comparable to the background concentrations.

3.4. Decay of carbon monoxide, black carbon and particle number concentration

To make this freeway study more comprehensive, the concentrations of CO, BC, and particle number were also measured at increasing distance from the freeway on selected dates, as shown in Table 1. CO and BC were intentionally selected because their ambient concentrations are closely related to vehicular emissions. Averaged concentration and range of values at different distances from the freeway of each measured property are summarized in Table 2. CO and BC concentrations decreased noticeably when moving away from the traffic sources, similar to the findings of the study by Zhu et al. (2002).

Figs. 7a–c were prepared by comparing the decay characteristic of CO, BC and particle number concentrations near the 405, gasoline vehicle dominated, and the 710, diesel vehicle dominated, freeways. Exponential decay was found to be a good estimator for predicting total particle number concentrations at different locations (Zhu et al., 2002). Each data point in the figure represents an averaged value for all measurements with similar wind directions. The solid line was the best fitting exponential decay curve, determined using SigmaPlot 2000 nonlinear curve fitting procedure. The best fitting exponential decay equations and R^2 values are also given in the figure. It can be seen, in general, all three pollutants decay at a similar rate near both freeways. This implies that atmospheric dilution plays a comparable role in both studies. As discussed previously, the average wind speed for these two studies are all close to 1.5 m/s. The discrepancies of the curves were mainly due to the different traffic fleet compositions on these two freeways. The 710 freeway has more than 25% heavy diesel trucks while the 405 freeway has <5%. It is well known that diesel engines emit less CO and more BC comparing to spark ignition engines (Kittelson et al., 2001). Fig. 7a shows that the concentration of CO near the 710 freeway is generally half of that near the 405 freeway. By comparison, Fig. 7b shows the BC concentration near a diesel vehicle dominated freeway is more than three times greater than that near a gasoline vehicle dominated freeway. As shown in Fig. 7c, the total particle number concentration close to the 405 freeway is somewhat higher than that near the 710 freeway, but drops faster with downwind distance. Since the rate of coagulation increases with decreasing particle size down to 20 nm (Hinds, 1999), the observed result suggests more of the smallest ultrafine particles, mostly in nanosize range, were emitted from the 405 freeway. This may be explained by a total of 20% more vehicles on the 405 freeway. It was previously reported that number emission rates from the spark-ignition vehicles were much lower than from the diesel vehicles under most operating conditions, but were similar under high-speed highway cruise conditions (Rickeard et al., 1996; Kittelson, 1998). It should also be noted that the exponential decay characteristic appears to extend to about 3 m downwind from the edge of the freeway for all three pollutants. Based on our results we conclude that atmospheric dilution is so rapid that average concentration decays continuously after leaving the tailpipe.

Table 2
Measured averaged concentrations at increasing distances from the freeway[a]

Measurement	Upwind (m)	Downwind distance (m)					
	200	17	20	30	90	150	300
CO	0.1	2.3	2.0	1.7	0.5	0.4	0.2
(ppm)	(0.0–0.2)	(1.9–2.6)	(1.5–2.4)	(1.1–1.9)	(0.2–0.7)	(0.1–0.5)	(0.1–0.3)
Black carbon	4.6	21.7	19.4	17.1	7.8	6.5	5.5
($\mu g/m^3$)	(3.1–5.9)	(20.3–24.8)	(16.5–21.6)	(12.6–19.3)	(4.5–9.3)	(3.9–9.2)	(3.5–7.7)
Number concentration	0.48	2.0	1.8	1.6	0.72	0.61	0.49
($\times 10^{-5}/cm^3$)	(0.36–0.57)	(1.8–2.5)	(1.5–2.5)	(1.2–1.9)	(0.42–1.1)	(0.35–0.98)	(0.30–0.59)

[a] Range given in parenthesis.

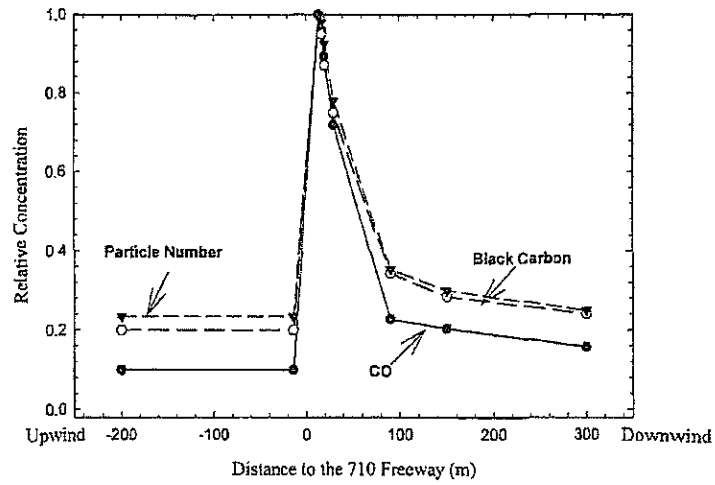

Fig. 8. Relative particle number, BC, CO concentrations versus distance from the 710 freeway.

Fig. 8 shows the decay curves for relative concentrations of CO, BC and total particle number. The curves are normalized and extended to reach 1.0 at the downwind edge of the 710 freeway. Background concentrations are also shown in the figure. It is seen that CO, BC and particle number concentration decreased about 60–80% in the first 100 m and then leveled off somewhat after 150 m, similar to what Zhu et al. (2002) reported. Background CO has a much lower relative concentration while background BC and particle number concentrations are comparable. Thus, CO was diluted more quickly and significantly than BC and particle number concentration. In general, CO, BC and particle number concentrations tracked each other very well. These results confirm the common assumption that vehicular exhaust is the major source for CO, BC and ultrafine particles near a busy freeway. They also support the conclusion made by Zhu et al. (2002) that for the conditions of these measurements the decreasing characteristics of any of these three pollutants could be used interchangeably to estimate the relative concentration of the other two pollutants near freeways.

4. Conclusions and summary

Wind speed and direction are important in determining the characteristic of ultrafine particles near freeways. The average concentrations of CO, BC and particle number concentration at 17 m was 1.9–2.6 ppm, 20.3–24.8 $\mu g/m^3$, 1.8×10^5–$3.5 \times 10^5/cm^3$, respectively. Relative concentration of CO, BC and particle number tracked each other well as one moves away from the freeway. Exponential decay was found to be a good estimator for the decrease of these three pollutants' concentration with distance along the wind direction starting from the edge of the freeway. Measurements show that both atmospheric dilution and coagulation play important roles in the rapid decrease of particle number concentration and the change in particle size distribution with distance away from a freeway.

Acknowledgements

This work was supported by the Southern California Particulate Center and Supersite: US Environmental Protection Agency under grant number R82735201, and California Air Resources Board under contract number 98-316. The authors also would like to thank Mr. Yuqing Zhang, for his assistance with the field measurement.

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ATTACHMENT H

Road to an Unhealthy Future for Southern California's Children

URBAN POLICY BRIEF

UNIVERSITY OF SOUTHERN CALIFORNIA URBAN INITIATIVE

Road To An Unhealthy Future For Southern California's Children

Andrea M. Hricko

USC
UNIVERSITY OF SOUTHERN CALIFORNIA

URBAN POLICY BRIEF

Urban Initiative Public Policy Briefing
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ROAD TO AN UNHEALTHY FUTURE FOR SOUTHERN CALIFORNIA'S CHILDREN

Andrea M. Hricko [1,2]

URBAN INITIATIVE POLICY BRIEF

Reporting on results of a USC study of air pollution's impacts on children and some policy issues this study raises.

For more than 10 years, investigators at the Keck School of Medicine of USC have studied air pollution to determine its effects on children. Results from the USC Children's Health Study (CHS) show that children in Southern California's more-polluted communities suffer reduced growth of lung function, asthma exacerbations, more school absences, and new onset asthma. Many of the effects are linked to pollution from mobile sources — cars, trucks, ships, planes, trains, and other gasoline- and diesel-powered equipment. Significant strides have been made in past decades to implement emission control strategies, but the number of mobile sources keeps increasing and smog levels have started to rise again over the past five years. Increasing pollution may be compounded by regulatory delays because the federal government has just postponed deadlines to clean the air from 2010 to 2021.

Based on this evidence, this policy brief reviews the CHS results and examines the number of children who may be impacted by delays in controlling air pollution and the geographic areas with the highest pollution levels. It also discusses the difficulty local air regulators have in protecting the region's interests in clean air against conflicting global and federal priorities. Finally, this brief considers regulatory measures to protect children's health by using available technology to reduce mobile source pollution as well as policy and planning solutions aimed at placing a higher priority on health when key development decisions are made.

Air pollution harms children's health

In 1993, USC investigators began enrolling 6,000 children from 12 communities in the CHS to determine whether long-term exposure to outdoor air pollution affected respiratory health. A decade later, the CHS has generated compelling evidence that the lungs of children living in

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[2]With thanks to the other authors of "Breathless in Los Angeles," described below, and to Michael Jerrett and Jim Gauderman (reviewers) and Amy Tam (manuscript assistance).

FIGURE 1:

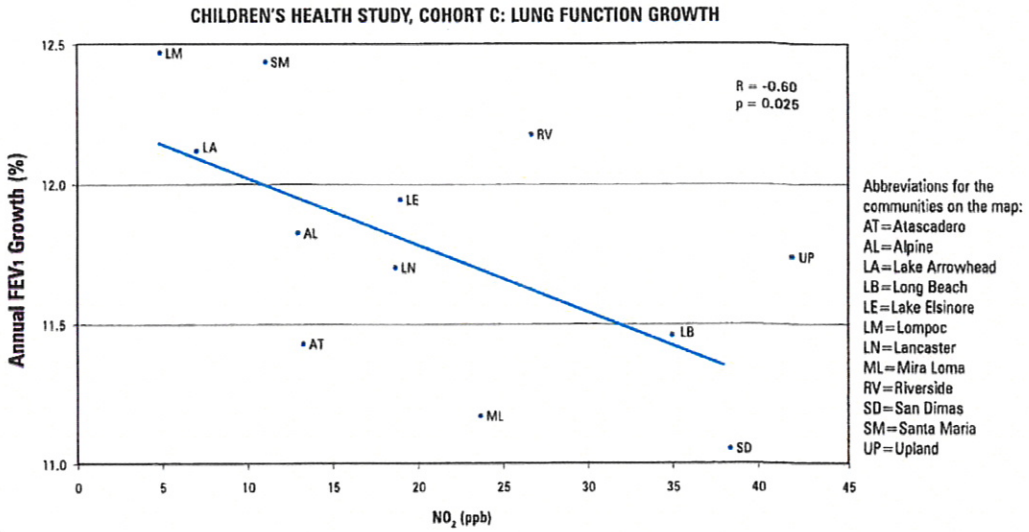
KEY RESULTS OF THE USC CHILDREN'S HEALTH STUDY

Children in the more-polluted communities have:

- Reduced lung function growth (their lungs grow more slowly)
- Improvement in lung function if they move to a less polluted community
- More school absences from acute respiratory problems when ozone levels go up
- Asthma exacerbation (in areas with more traffic-related pollutants)
- More cases of newly diagnosed asthma (in areas with high ozone levels)

FIGURE 2:

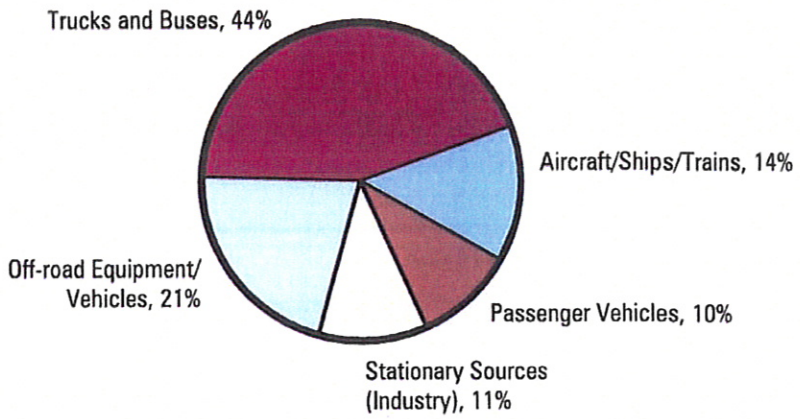
GROWTH OF LUNG FUNCTION DECREASES AS TRAFFIC-RELATED AIR POLLUTION INCREASES



Source: Children's Health Study

FIGURE 3:

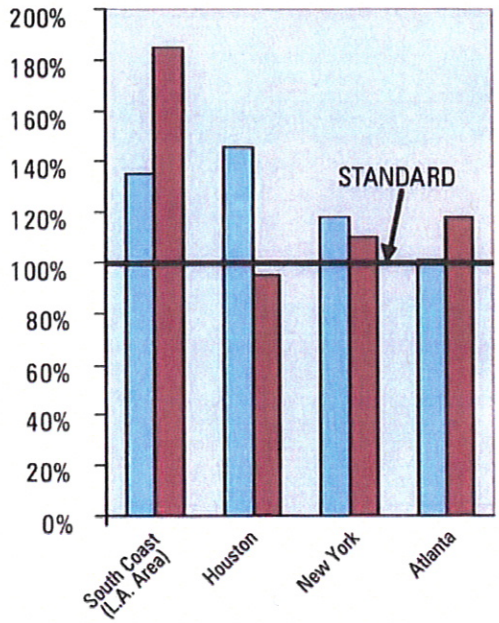
MOBILE SOURCES ARE THE MAJOR CONTRIBUTORS TO OXIDES OF NITROGEN IN THE REGION'S AIR



Source: South Coast Air Quality Management District, Air Quality Management Plan, 2003.

FIGURE 4:

MAXIMUM POLLUTANT CONCENTRATIONS AS PERCENT OF FEDERAL STANDARDS SOUTH COAST AIR BASIN COMPARED TO OTHER URBAN AREAS (2002)



Ozone is the main ingredient of smog. Ozone is not directly emitted but is formed in the atmosphere when emissions (including hydrocarbons and nitrogen oxides) from vehicles, industrial facilities, and other sources, react in the presence of sunlight.

$PM_{2.5}$ is particulate matter where the particles are less than 2.5 microns in diameter. These small particles come from vehicle exhaust and other fuel combustion, road dust, and other sources. Exposure to high levels of $PM_{2.5}$ is linked to an increase in respiratory and cardio-vascular illnesses and deaths.

Source: AQMD Air Quality Standards Compliance Report, 2003.

more-polluted communities develop more slowly and that these deficits probably have long-term health and social consequences.[3] [Figs. 1 & 2] CHS results also show that children with asthma get sicker when exposed to higher levels of pollutants associated with traffic emissions [Fig. 3], such as particulate matter (PM) and nitrogen dioxide.

In addition, the CHS shows that (1) in higher ozone communities, children with significant outdoor activity develop asthma more often than children in less polluted communities, and (2) when ozone levels go up, children develop more acute respiratory problems, causing them to miss school. These absences, in turn, create an added economic burden for caregivers,[4] and for school districts which lose per-pupil funding. They may also interfere with a child's education.

Federal government deadlines for cleaning the region's air have been delayed

The four-county region (L.A., Orange, Riverside and San Bernardino) has some of the highest levels of particulate matter (small particle pollution from exhaust, fuel combustion, road dust and other sources) and ozone in the country. [Figs. 4, 5 & 6]. Ozone levels last year rose to the highest levels in the past five years. [Fig. 7]. Under a plan implemented by the South Coast Air Quality Management District (AQMD), the area had until 2010 to achieve improved air quality. But in April 2004, the U.S. Environmental Protection Agency (EPA) issued stricter ozone rules that, while they will be harder for Southern California to meet, also extended its smog cleanup deadline to 2021.

New mobile sources of pollution continue to be added

Already accommodating 16 million people, 9 million cars, and 261,000 diesel vehicles, by 2020 the four-county region of the LA metropolitan area will add several million more cars and thousands more trucks to the roads,

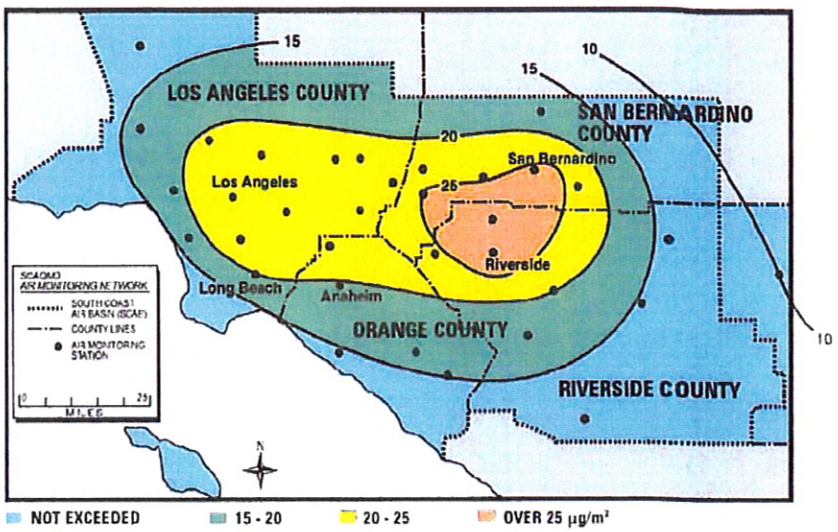
[3] Kuenzli N, McConnell R, Bates D, Bastain T, Hricko A, Lurmann F, Avol E, Gilliland F, Peters J. Breathless in Los Angeles: the exhausting search for clean air. *Am J Public Health*. 2003 Sep;93(9):1494-9. *Includes references for many of the papers reporting CHS results.*

[4] Jane V. Hall, Victor Brajer, and Frederick W. Lurmann. Economic valuation of ozone-related school absences in the South Coast Air Basin of California. Contemporary Economic Policy. Vol. 21, No. 4, October 2003, 407-417.

FIGURE 5:

ANNUAL AVERAGE $PM_{2.5}$ CONCENTRATIONS, 2002 (ARITHMETIC MEAN, $\mu g/m^3$)

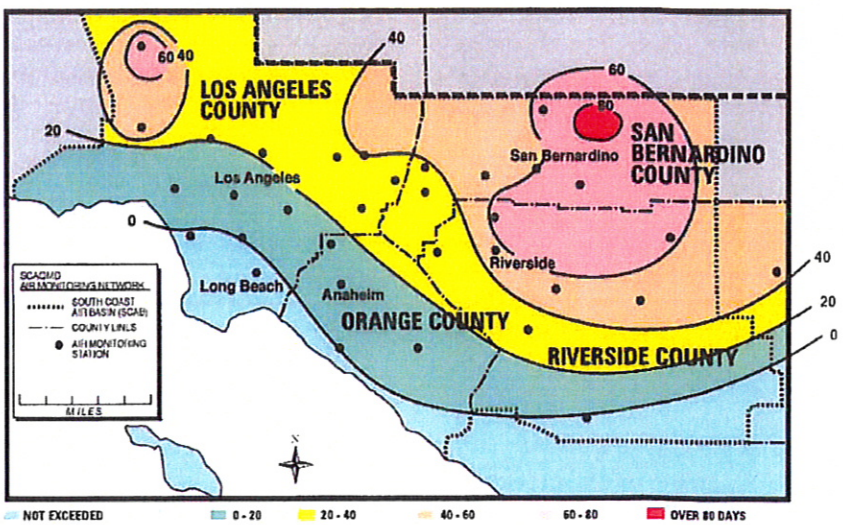
[NOTE: THE CURRENT CALIFORNIA AIR RESOURCES BOARD STATE STANDARD IS 12 $\mu g/m^3$ AS AN ANNUAL AVERAGE]



Source: AQMD, Air Quality Standards Compliance Report, 2003.

FIGURE 6:

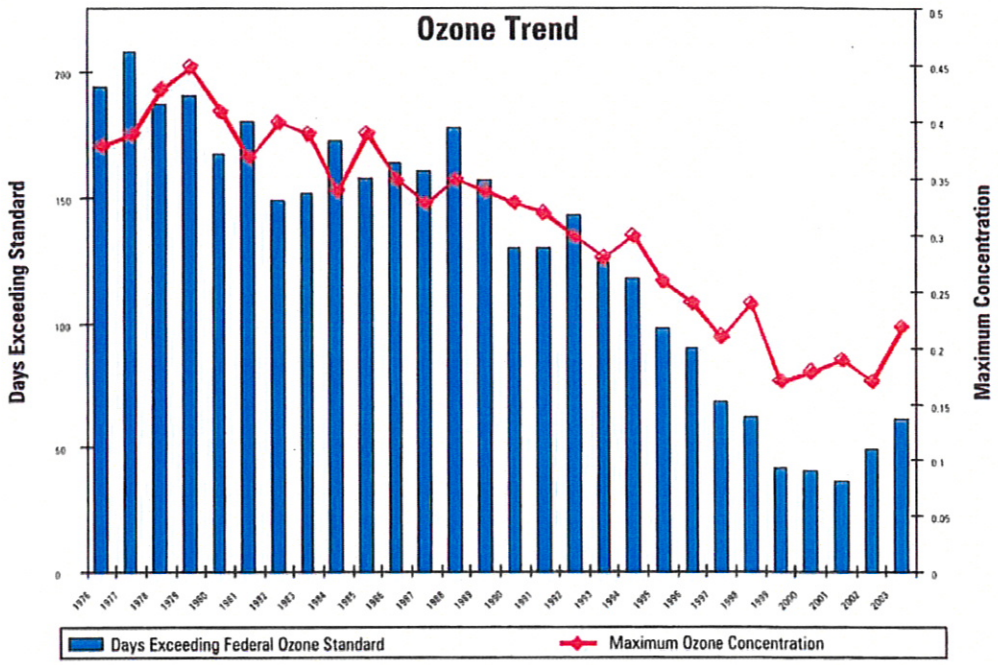
NUMBER OF DAYS EXCEEDING THE FEDERAL 8-HR OZONE AIR QUALITY STANDARD IN 2003



Source: AQMD, Air Quality Standards Compliance Report, 2004.

FIGURE 7:

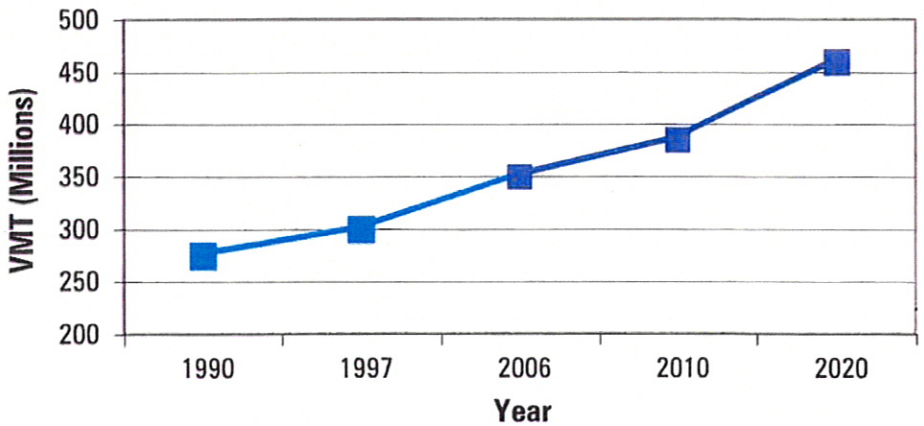
OZONE AIR QUALITY TRENDS IN THE SCAQMD (1976 - 2003)



Source: AQMD, Air Quality Standards Compliance Report, 2004.

FIGURE 8:

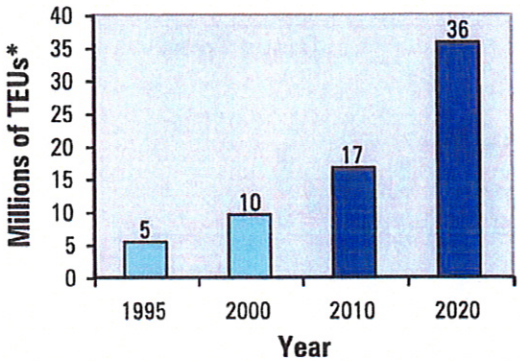
DAILY VEHICLE MILES TRAVELED (VMT) IN 4-COUNTY REGION



Source: AQMD, Air Quality Management Plan, 2003.

FIGURE 9:

CONTAINER TRAFFIC FORECAST FOR THE PORTS OF LOS ANGELES AND LONG BEACH



*TEU = a twenty-foot equivalent unit or a twenty-foot cargo container

Source: Data from Ports of Los Angeles and Long Beach, 2004.

increasing total vehicle miles traveled by 35%. [Fig. 8] In addition, the Los Angeles/Long Beach Port complex has become the world's third largest port, flooding the region with imported cargo containers [Fig. 9] transported by ships and freight trains operating on low-grade fuel along with big-rig trucks, which together emit tons of airborne pollutants. By 2025, twice as many diesel locomotives and big-rig diesel trucks will be needed to handle booming international trade, and the number of truck trips a day on the I-710 Freeway, alone, is expected to jump from 47,000 to 100,000 in 2025.[5]

Local interests to clean the air are hampered by global and federal priorities

Nearly all ships entering the two ports are foreign-flagged with their emissions virtually unregulated. Currently, locomotives and airplanes are covered by federal rules that require much less stringent emission controls than cars and trucks, even though the AQMD calls the port complex and the L.A. International Airport the region's two largest single sources of air pollution. Still more pollution will be emitted as U.S. roads open to unregulated Mexican trucks, the result of a recent Supreme Court decision upholding President Bush's authority (under free trade agreements) to allow the trucks through without any review of environmental effects. Without strict controls on these major emission sources under international and federal jurisdiction, state and local air pollution regulators are forced to require more controls on other sources, including small businesses, to reduce air pollution.

Millions of children will be at increased risk if the air is not cleaned until 2021

Some four million children younger than 18 live in the four-county region, breathing today's polluted air. CHS researchers studied adolescents who left the Los Angeles area and found that lung function growth improved in those who moved to areas with lower particle pollution. These findings strongly suggest that children currently living in more-polluted communities would derive *immediate* health benefits if the air became cleaner.

Failure to control all significant air pollution sources in the region on a tight timeline will hurt future generations, since new cars, SUVs, trucks, locomotives, and ships purchased today will spend many decades polluting the region's air. Between now and the 2021 EPA deadline for clean air, more than five million babies will be born in these counties and will be subjected to increased risk of respiratory problems from air pollution.

Health effects may be preventable with cleanest available technology

The AQMD director recently stated that the Los Angeles basin's air can be cleaned of mobile-source diesel pollution only by "deploying the cleanest commercially-available technologies as soon as possible."[6] For all vehicles, the region must (1) develop cleaner, low-emission engines or

[5] Meyer, Mohaddes Associates, Inc. *Draft Port of Los Angeles Baseline Transportation Study*. December 2003.

[6] Wallerstein, Barry. A local air district's view of diesel emissions. Presentation to the California Air Pollution Control Officer's Assoication Conference on Diesel. January 27, 2004.

FIGURE 10:

SOUTHERN CALIFORNIA REGIONAL TRAFFIC TRENDS AND AIR POLLUTION LEVELS: ROAD TO AN UNHEALTHY FUTURE?

2004 Children's Health Study Results: Today's Air in More-Polluted Communities	Projections (constraints for reducing pollution)	Air Pollution Levels	Key control strategies needed to reduce traffic emissions	Steps to Protect Health
↓ Children's lung function growth ↑ Rate of school absences from acute respiratory problems after pollution levels are high ↑ Rate of asthma exacerbations ↑ Economic costs to care for children who are sick and miss school	↑ Population - 22% increase by 2020 ↑ Cars and trucks - 35% increase by 2020 in vehicle miles traveled ↑ Capacity of freeways ↑ International Trade - 300% increase in imported cargo containers by 2025 ↑ 200% increase in number of diesel locomotives ↑ 240% increase in number of big-rig trucks on I-710 and other freeways ↑ Number of port terminals ↑ Number of cargo warehouses ↑ Size of rail yards ↑ Number of trucks from Mexico ↑ Capacity of Airports	↑ Ozone levels on the rise during past 5 years; among highest in the U.S. ↑ Particle (PM_{10}) levels from on-road mobile sources will increase 4% by 2030, according to the Regional Transportation Plan of the Southern California Association of Governments (April 2004) ? Particle ($PM_{2.5}$) levels among highest in the U.S. No projections available Federal regulations expected to require meeting a 2014 deadline.	↑ Use of alternative fuels ↑ Number of low or zero emission vehicles ↑ Fuel economy ↑ Cleanup or retrofit of existing fleets ↑ Removal of the most polluting engines ↑ Public transit ↑ Car pools ↓ Travel demand (use vehicles less)	↑ Consideration of "health" in planning, land use, economic development, and transportation decisions ↑ Evaluation of health effects' economic costs ↑ Education of public officials about the impacts of air pollution on health ↓ Emissions from mobile sources under federal and international control

2004 → New state and federal rules expected to be implemented between 2004 - 2021 to address mobile source emissions → **2021**

DEADLINE TO CLEAN THE AIR

alternative fuels, (2) increase fuel economy, (3) clean up or retrofit existing fleets, and (4) remove the most-polluting engines from operation. Without success in these areas, other strategies to clean the air will not likely succeed.[7] A recent Supreme Court ruling, however, prohibits the AQMD from requiring private trucking and vehicle fleet operators to purchase low-polluting vehicles, again limiting local regulators who recognize the seriousness of Southern California's air pollution problem.

Transportation and land use decision makers need to integrate concerns about air pollution's adverse health impacts and related health costs

Government agencies, planners and elected officials are striving to expand the four-county transportation infrastructure. They are pushing for expansion of freeways, rail facilities and bridges to move increasingly larger volumes of imported cargo from the ports to the rest of the country.[8] Advocates for economic development argue that expanding international trade, the ports, and related infrastructure is critical to the region's economic growth.[9] Yet, these discussions continue to omit significant public health considerations.

The challenge ahead is for regional planners, economists, elected officials and other decision-makers to develop an integrated approach to developing the region's infrastructure, with a high priority on protecting health. This requires a proactive effort to develop a true dialogue with scientific researchers, air-pollution regulators, and impacted communities so that the health and well-being of the region's children does not fall victim to political and economic interests. Southern California might look to efforts of other regions that are incorporating guiding principles for sustainable transportation into their planning to reduce negative impacts on residents.[10] Without a visionary public health regulatory policy to reduce air pollution from *all* significant mobile sources — including ships, planes, locomotives, and some trucks under currently relaxed international and federal regulations — we are on the road to an unhealthy future for millions of Southern California children. [Fig. 10]

Additional policy strategies, regulatory actions, and behavioral changes that could reduce air pollution, such as reducing travel demand, improving vehicle inspections, investing in public transit, and limiting urban sprawl can be found in Ref. #3.

See, for example, Southern California Association of Governments, Goods Movement Program White Paper, January 2002.

See, for example, Los Angeles Economic Development Corporation, International Trade Trends and Impacts: The Southern California Region 2003 Results and 2004 Outlook, May 2004.

See, for example, OECD International Conference, Vancouver, Canada, 24-27 March, 1996. Guiding Principles for Sustainable Transportation. http://www.gdrc.org/oem/sustran/sustran-principles.html Resource: Hricko A and Markuze K. "A Breath of Air: What Pollution is Doing to our Children," *a 28-minute documentary video describing results of the CHS. Available in English and Spanish (free) from the California Air Resources Board http://www.arb.ca.gov/research/health/school/school.htm*

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ATTACHMENT I

The Proposed Valley Boulevard Alhambra Avenue Connector DVD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 15, 2011

Ron Kosinski
California Department of Transportation, District 7
100 South Main Street, Suite 100
Lost Angeles, CA 90012

Subject: Scoping Comments for the 710 North of Alhambra Project, Los Angeles County, California

Dear Mr. Kosinski:

The U.S. Environmental Protection Agency (EPA) has reviewed the Notice of Intent published in the Federal Register March 9, 2011, requesting comments on the California Department of Transportation (Caltrans) proposal to prepare a Draft Environmental Impact Statement (DEIS) for the 710 North of Alhambra Project. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. We recognize that the state of California has assumed responsibilities under NEPA for this project pursuant to the *Memorandum of Understanding Between the Federal Highway Administration and the California Department of Transportation Concerning the State of California's Participation in the surface Transportation Project Delivery Pilot Program.*

Purpose and Need and Range of Alternatives

Section 6002 of Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) requires that the lead agency provide an opportunity for involvement by Participating Agencies in defining the Purpose and Need and in determining the Range of Alternatives for a project as early as practicable during the environmental review process. We note that EPA will be a Participating Agency for this project, as defined by SAFETEA-LU. We look forward to providing feedback once a draft Purpose and Need Statement and subsequent draft Range of Alternatives are provided to Participating Agencies for comments under SAFETEA-LU coordination. At this time, EPA provides the following general comments on Purpose and Need and Range of Alternatives:

Purpose and Need

The Purpose and Need should focus on the underlying problems to address and the reasons a project is considered and should not be written in a way that prescribes a particular solution. In particular, the Purpose and Need statement should not be written so as to exclude

alternatives which might be less impactful to the environment or public health that would accomplish the underlying mobility/accessibility the project seeks to provide. It is critical that the Purpose and Need not prescribe or imply a predetermined solution such as an expansion of a freeway. Freeway capacity enhancements may be an included component of the potential solution to the problems identified in a Purpose and Need; however, the Purpose and Need should allow for the analysis of a full scope of alternatives, including other modes of transportation

Range of Alternatives

The DEIS should explore and objectively evaluate a range of reasonable alternatives, including the no action alternative, and briefly discuss the reasons for eliminating some alternatives from further evaluation (40 CFR 1502.14). The alternatives should explore opportunities to avoid or minimize adverse environmental impacts while fulfilling the project purpose. While we understand that the proposed project has a long history, including previously completed environmental analyses spanning many years, Caltrans ultimately must ensure that a proper evaluation of all alternatives is conducted if the analyses will be used to meet obligations under NEPA. EPA recommends that the DEIS present the environmental impacts of a reasonable range of alternatives considered (including the locally preferred alternative(s) and the No-Build Alternative) in comparative form, sharply defining the issues and providing a clear basis for choice among options for the decision maker and the public (40 CFR 1502.14).

EPA recommends that the DEIS include a summary of the screening methodology that was used to determine the Range of Alternatives for inclusion in the DEIS. The methodology summary should include information about which criteria and measures were used at each screening level and how they were integrated in a comprehensive evaluation. The DEIS should also include a description of alternatives that were considered but withdrawn with a summary of why they were eliminated. The DEIS should identify opportunities for the alternatives to avoid or minimize adverse environmental and community impacts while fulfilling the project purpose. This may include alignment shifts, buffers, localized design modifications, changes in construction practices, tunneling, or spanned crossings of sensitive biological resources.

Impacts of Increased Vehicle Travel

The project proposes to increase motor vehicle capacity. Any analysis of emissions of greenhouse gases (GHGs) or other air pollution, noise, and other impacts to human health and the environment that increase with increased vehicle miles traveled should be based upon travel demand modeling which takes into account the increased demand for vehicle travel caused by this increased capacity. Because the additional vehicle travel that results from this induced demand will distribute itself throughout the regional roadway network, it is important to use a travel demand model that will capture the increased vehicle load on other highways and city streets anywhere that increase is significant. The DEIS should describe how any traffic estimates were developed and how these traffic estimates relate to regional transportation estimates. Any supporting documents on which the conclusions of the project's impacts to air quality are based, such as traffic data and other air analyses, should be included in an appendix to the DEIS.

If emissions are analyzed as for a restricted lanes alternative (e.g. HOT, HOV, Freight-only) then the DEIS should include verification or guarantee that the lanes will remain restricted in perpetuity. A change in this restriction would change the impacts of the project. Additionally, EPA strongly recommends incorporation of a zero tailpipe emissions alternatives and technology for this project.

Impacts from Proposed Tunneling

Tunneling alternatives would require extensive earthmoving and result in large amounts of material being transported through urban areas. The DEIS should disclose an approximate amount of material to be removed per mile of tunnel and where material could be disposed or stored. The DEIS should describe the tunneling methodology proposed, amount and type of material removal, the routes needed to haul and remove fill, and the need for any exploratory drilling. In addition, equipment and planned locations for staging tunnel operations should be included.

The location at which excavated materials would be deposited should be named and impacts of the deposits should be discussed. Impacts resulting from the need to excavate and transport deposits, including localized pollutants such as mobile source air toxics, regional air pollutants, traffic, and noise, should be estimated and mitigated to the extent feasible. Further, routes should be chosen to haul deposits that minimize localized air quality and noise impacts to residents.

The DEIS should identify how construction and operation of any alternatives that include tunneling will affect groundwater and hydrological function. Specifically, any long-term maintenance needs regarding dewatering and required dredging should be addressed in the DEIS. A discussion of the methods available to reduce impacts (aerial, tunnel boring, cut-and-cover, etc.) along with associated estimates of impacts to water resources should be incorporated into the DEIS.

Potential Displacement of Residences and Businesses

The DEIS should commit to specific mitigation measures to minimize the impacts of displacement and relocation on all populations from all alternatives analyzed. Mitigation measures should be presented along with a description of the responsible party, timing for implementation, and length of time anticipated for complete implementation. Caltrans should also conduct interviews with all potential displacees to determine relocation needs and should confirm that those who have special needs will be accommodated with a plan for assistance as needed. To mitigate community character and cohesion impacts to communities, EPA recommends conducting public workshops and working directly with affected populations to identify effective and creative ways to minimize or mitigate these impacts.

Near Roadway and Public Health Impacts

Due to the high level of diesel traffic and potential proximity of the Project to residences and other sensitive receptors, EPA is particularly concerned about the level of analysis for

mobile source air toxics (MSATs) impacts. Many studies have measured elevated concentrations of pollutants, which are emitted directly by motor vehicles, near large roadways. These elevated concentrations generally occur within approximately 200 meters of the road, although the distance varies depending on traffic and environmental conditions. Pollutants measured with elevated concentrations include benzene, polycyclic aromatic hydrocarbons, carbon monoxide, nitrogen dioxide, black carbon, and coarse, fine, and ultrafine particles. For a thorough review of near-roadway monitoring studies, see Section 3.1.3 of EPA's "Regulatory Impact Analysis: Control of Hazardous Air Pollutants from Mobile Sources" (February 2007, http://www.epa.gov/otaq/regs/toxics/fr-ria-sections.htm).

A large number of recent studies have examined the association between living near major roads and different adverse health effects. Several peer reviewed epidemiologic studies have shown associations with cardiovascular effects, premature adult mortality, and adverse birth outcomes, including low birth weight and size. Traffic-related pollutants have been repeatedly associated with increased prevalence of asthma-related respiratory symptoms in children. Also, based on toxicological and occupational epidemiologic literature, several of the MSATs, including benzene, 1,3-butadiene, and diesel exhaust, are classified as known and likely human carcinogens. Thus, near roadway environments present an elevated cancer risk, including childhood leukemia. For additional information on MSATs, please see EPA's MSAT website at http://www.epa.gov/otaq/toxics.htm.

Building a new roadway in the immediate vicinity of residential neighborhoods could result in localized MSAT impacts in the project area to nearby receptors. In the DEIS, an estimate of potential MSAT impacts and near roadway receptors should be presented. EPA believes an MSAT analysis should be undertaken for this project because 1) the project represents the addition of a major thoroughfare; 2) the proposed project may be in close proximity to sensitive receptors; 3) the project could have significant health impacts on any low-income and minority communities along the corridor; 4) there is an increasing public awareness of air quality impacts associated with transportation projects; and, 5) there are heavy traffic increases projected in this corridor.

Our primary recommendations for future analyses and for incorporation into the DEIS are to provide a MSAT analysis that includes at a minimum: 1) quantifying the construction and operational emissions for MSATs, 2) identifying hotspots (i.e. localized impacts) with a discussion of the related toxicity weighting of potential MSAT impacts, 3) dispersion modeling, 4) risk assessment, and 5) committing to appropriate avoidance, minimization, and/or mitigation opportunities.

These analyses are further described in the March 2007 report entitled "Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process" conducted for the American Association of State Highway and Transportation Officials (AASHTO) Standing Committee on the Environment and funded by the Transportation Research Board (http://www.trb.org/NotesDocs/25-25(18)_FR.pdf). Procedures for toxicity-weighting, which EPA has found to be especially useful for the targeting of mitigation, are described in EPA's Air Toxics Risk Assessment Reference Library (Volume 3, Appendix B, beginning on page B-4, http://epa.gov/ttn/fera/data/risk/vol_3/Appendix_B_April_2006.pdf).

EPA would be happy to work with Caltrans to evaluate the appropriate level of MSAT analysis for this project.

These recommendations, and the recommendations included in the report for AASHTO referenced above, differ substantially from the recently released September 30, 2009 FHWA Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA Documents. While there are positive elements to this guidance, especially the acknowledgement of potential MSAT concerns, EPA continues to disagree with major elements of this approach nationally.

Public Health Impacts

Through our coordination with Caltrans on the expansion of 710 south of the proposed project area, EPA has requested that Caltrans share the proposed strategy and methodology for the "focused assessment of public health considerations" that will address the expectations raised by the public and agencies for a robust assessment of health impacts that will result from the southerly expansion. We understand that a Health Impact Assessment (HIA) is being completed by partner agencies for the expansion of 710 south of the 710 North of Alhambra Project. HIAs look at health holistically, considering not only bio-physical health effects, but also broader social, economic, and environmental influences. HIAs also explicitly focus on health benefits and the distribution of health impacts within a population. HIAs strive to anticipate potential impacts for decision-makers and to deliver a set of concrete recommendations targeted at minimizing health risks and maximizing benefits.[1]

We encourage Caltrans to refer to the October 2010 publication, "A Guide for Health Impact Assessment", which was published for the California Department of Health (http://www.cdph.ca.gov/pubsforms/Guidelines/Documents/HIA%20Guide%20FINAL%2010-19-10.pdf). We recommend that Caltrans coordinate analyses for both NEPA documents (710 Expansion and 710 North of Alhambra Project) and incorporate information produced from the I-710 HIA into decision-making.

Noise Impacts

The DEIS should include an assessment of noise impacts and should identify proposed mitigation (for example, construction of new noise barriers along segments of the proposed project). EPA encourages mitigation of noise impacts, particularly in areas where residences would be impacted.

Air Quality Impacts

Regional Air Quality

The project is located in the South Coast Air Basin. The area is a federally designated Extreme nonattainment area for the 1997 8-hour ozone National Ambient Air Quality Standard

[1] Bhatia, Rajiv and Wernham, Aaron. Integrating Human Health into Environmental Impact Assessment: An Unrealized Opportunity for Environmental Health and Justice. Environmental Health Perspectives. Available on-line April 16, 2008.

(NAAQS), and nonattainment for the 2006 and 1997 PM 2.5 standards and the PM-10 standard. [40 CFR Part 81]. The area is also a maintenance area for carbon monoxide (CO) and nitrogen dioxide (NO2). Because of the area's air quality status, the DEIS should specifically identify measures to reduce emissions of particulates and ozone precursors, including nitrogen oxides (NO_x), resulting from the project.

Recommendations:

- Ambient Conditions: The DEIS should include a detailed discussion of ambient air conditions (i.e., baseline or existing conditions), the area's attainment or nonattainment status for all NAAQS, and potential air quality impacts (including cumulative and indirect impacts) from the construction and operation of the project for each fully evaluated alternative. The DEIS should include estimates of all criteria pollutant emissions and diesel particulate matter (DPM). EPA also recommends that the DEIS disclose the available information about the health risks associated with construction and truck emissions and how the proposed project will affect current emission levels.
- Relevant Requirements: The DEIS should describe any applicable local, state, or federal requirements. The DEIS should describe applicable requirements for Federal Actions that require Federal Transit Administration (FTA) or Federal Highway Administration (FHWA) funding or approval and are subject to the Transportation Conformity requirements in 40 CFR part 93, subpart A and for Federal Actions that are subject to the General Conformity requirements in 40 CFR part 93, subpart B.
- Conformity: The DEIS should ensure that the emissions from both the construction and the operational phases of the project conform to the approved State Implementation Plan and do not cause or contribute to violations of the NAAQS. To meet the transportation conformity requirements, the DEIS should demonstrate that the project is included in a conforming transportation plan and transportation improvement program.
- PM and CO Project-Level Hotspot Analyses: Project-level hot spot analyses for PM_{10}, $PM_{2.5}$, and carbon monoxide (CO) are required for the portion of the project that will be funded or approved by FHWA or FTA. The DEIS should ensure the $PM_{2.5}$ and PM_{10} project-level hotspot analyses are performed following EPA's March 2006 or December 2010 procedures if the project is deemed, via interagency consultation, to be a Project of Air Quality Concern. Note that there is a NEPA policy memo (February 8, 2011, "Using the MOVES and EMFAC Models in NEPA Evaluations" which describes how the transition period from the 2006 to the 2010 guidance applies to NEPA. The NEPA policy memo can be found at the following web site: http://www.epa.gov/compliance/resources/policies/nepa/
- Construction: The responsible agency should include a Construction Emissions Mitigation Plan in the DEIS and adopt this plan in the Record of Decision (ROD). In addition to all applicable local, state, or federal requirements, EPA recommends that the following mitigation measures be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter (PM) and other toxics from construction-related activities, including the following:

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Minimize use, trips, and unnecessary idling of heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, where applicable, and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications. The California Air Resources Board has a number of mobile source anti-idling requirements which could be employed. See their website at: http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- If practicable, lease new, clean (diesel or retrofitted diesel) equipment meeting the most stringent of applicable Federal[2] or State Standards[3]. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible[4]. Lacking availability of non-road construction equipment that meets Tier 4 engine standards, Caltrans should commit to using the best available emissions control technologies on all equipment.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.

Administrative controls:

- Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal

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[2] EPA's website for nonroad mobile sources is http://www.epa.gov/nonroad/.

[3] For ARB emissions standards, see: http://www.arb.ca.gov/msprog/offroad/offroad.htm.

[4] Diesel engines < 25 hp rated power started phasing in Tier 4 Model Years in 2008. Larger Tier 4 diesel engines will be phased in depending on the rated power (e.g., 25 hp - <75 hp: 2013; 75 hp - < 175 hp: 2012-2013; 175 hp - < 750 hp: 2011 - 2013; and ≥ 750 hp 2011- 2015).

availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.) Meet CARB diesel fuel requirement for off-road and on-highway (i.e., 15 ppm), and where appropriate use alternative fuel sources such as natural gas and electric power.

- Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

Greenhouse Gas Emissions Mitigation and Sustainable Communities Strategies

The State of California has increased its focus on greenhouse gas emissions reduction in recent years. The Global Warming Solutions Act of 2006 and Executive Order S-3-05 recognize the impact that climate change can have within California and provide direction for future reductions of greenhouse gases. The Natural Resources Agency recently adopted Amendments to the California Environmental Quality Act (CEQA) Guidelines for greenhouse gas emissions on December 30, 2009, which became effective on March 18, 2010[5]. Senate Bill 375 (SB 375) is aimed at curbing sprawl and reducing vehicle miles traveled in an effort to cut greenhouse gas emissions. SB 375 requires Metropolitan Planning Organizations (MPOs) to develop a "sustainable communities strategy" (SCS), which demonstrates how the region will meet greenhouse gas emissions reduction targets set by CARB. In addition, under the Partnership for Sustainable Communities, EPA, the U.S. Department of Housing and Urban Development, and the U.S. Department of Transportation are working together to help improve access to affordable housing, provide more transportation options, and lower transportation costs while protecting the environment in communities nationwide.

EPA strongly recommends that the DEIS estimate the cumulative contributions to greenhouse gas emissions that will result from implementation of the project. Changes in vehicle travel volumes resulting from adding vehicle capacity must be considered in order to create reasonable estimates of greenhouse gas emissions; an analysis that assumes a fixed amount of vehicle travel once additional lane capacity is provided will not produce realistic greenhouse gas emissions estimates.

Because the changes in travel patterns will be complex and geographically extensive, we strongly recommend utilizing the best available regional travel demand model to determine changes in vehicle travel. We also strongly recommend using the best available modeling to determine emissions from the travel patterns that would result from each alternative.

Where vehicle efficiency changes due to changes in vehicle speed are analyzed, permeation of electric-drive (e.g. hybrid, plug in hybrid, and battery electric) vehicles into the overall vehicle fleet should be considered. Electric-drive vehicles peak in efficiency at considerably lower speeds. Therefore, while congestion reduction leading to higher vehicle

[5] Amendments to the CEQA Guidelines for greenhouse gas emissions are available on-line at: http://ceres.ca.gov/ceqa/guidelines/.

speeds may lower emissions per vehicle mile traveled from conventional vehicles, it will tend to increase emissions associated with electric-drive vehicles. As a result, in later years of the analysis when a high rate of electric-drive vehicles have permeated the fleet, the project's effect of increasing vehicle speeds may increase, rather than decrease, emissions.

Recommendations:

- Estimate net greenhouse gas (GHG) emissions from all project alternatives
- When estimating GHGs resulting from the project, include an estimate of vehicle travel increase due to the project, and the emissions from that increased travel.
- Analyze emissions from vehicle travel over the full geographical extent over which the project affects vehicle travel; ideally this would be the regional level for a project of this size and scope.
- When estimating GHG emissions due to changes in vehicle speeds, consider permeation of electric vehicles into the fleet and their different emissions versus speed profile over the full life of the project.
- Identify design elements intended to reduce GHG emissions and disclose estimated reductions.

Climate Change Adaptation

We recommend that the DEIS discuss the potential impacts of climate change on the project. For example, the DEIS should discuss design features that will allow the proposed infrastructure to withstand an increase in extreme precipitation events, and drought tolerant landscaping should be used to prepare for water shortages. We suggest the DEIS discuss adaptation to climate change in context, by describing how the project meets the intent of statewide and national sustainability initiatives and goals to develop sustainable communities.

Aquatic Resources and Hydrology Impacts

Existing On-site Groundwater Contamination

The location of the proposed Caltrans project is within the San Gabriel Valley Area Superfund Site (Area 3), a large area of ground water contamination underlying portions of the cities of Alhambra, Rosemead, San Gabriel, San Marino, South Pasadena, and Temple City, and unincorporated Los Angeles County. EPA completed a remedial investigation to evaluate the nature and extent of contamination ground water in 2009. The findings of this investigation, including the locations and types of contamination within Area 3, are summarized in the document "Remedial Investigation, San Gabriel Valley Area 3 Superfund Site" (June 2009) previously provided to Caltrans. The complete report also is posted on EPA's Web site at http://www.epa.gov/region9/sangabriel under the site summary for Area 3. EPA recommends that Caltrans consider the information presented in the remedial investigation report, including the data regarding hydrogeology and areas of contamination, in developing the DEIS for the project.

EPA currently is preparing a feasibility study to evaluate options for ground water cleanup in Area 3. We expect to complete the feasibility study report and identify a cleanup

remedy in 2012. Implementation of the ground water cleanup in Area 3 will occur several years in the future. For more information, please contact Lisa Hanusiak of EPA Region 9 Superfund Division at 415-972-3152.

Aquatic Resources Impacts

The DEIS should identify if the project will involve the discharge of dredged or fill material into jurisdictional wetlands and waterways and should impacts to water quality or hydrology (i.e. dewatering requirements due to tunneling alternatives). Discharges of dredged or fill material into waters of the U.S. require authorization by the U.S. Army Corps of Engineers (Corps) under Section 404 of the Clean Water Act (CWA). The Federal Guidelines at 40 CFR Part 230 promulgated under CWA Section 404 (b)(1) provide substantive environmental criteria that must be met to permit such discharges into waters of the U.S. Should the project have greater than 5 acres of permanent impacts to waters of the United States, project coordination will commence pursuant to the April 2006 *National Environmental Policy Act and Clean Water Action Section 404 Integration Process for Federal Aid Surface Transportation Projects in California Memorandum of Understanding* (NEPA/404 MOU). The NEPA/404 MOU includes specific agreement points to assist in developing the EIS and involves active participation in meetings and document reviews. We encourage Caltrans to contact the NEPA/404 signatory agencies once more information about the potential impact to waters of the United States is available so that the agreement points can be addressed as early as possible in the EIS process.

Avoidance, Minimization and/or Mitigation Measures

To demonstrate compliance with CWA Guidelines, the DEIS should identify measures and modifications to avoid and minimize impacts to water resources. Temporary and permanent impacts to waters of the U.S. for each alternative studied should be quantified; for example, acres of waters impacted, etc. For each alternative, the DEIS should report these numbers in table form for each impacted water and wetland feature.

Recommendations:

- Identify if the project will affect waters of the United States.
- Include a summary of the projects impacts to hydrology, including long term water management needs associated with tunneling.
- Discuss mitigation for temporary and unavoidable permanent impacts. Temporary impact mitigation should consider additional compensatory mitigation for temporal loss of functions as well as establishing numeric criteria and monitoring of the temporary impact site to ensure that aquatic functions are fully restored. The link to the final Mitigation Rule, which went into effect on June 9, 2008, can be found at http://www.epa.gov/EPA-WATER/2008/April/Day-10/w6918a.pdf.
- Include the classification of waters and the geographic extent of waters and adjacent riparian areas.
- Characterize the functional condition of waters and adjacent riparian areas.
- Describe the extent and nature of stream channel alteration, riverine corridor continuity, and buffered tributaries.
- Characterize the hydrologic linkage to any impaired water body.
- Analyze the potential water quality impact and potential effects to designated uses.

- Address techniques proposed for minimizing surface water contamination due to increased runoff from additional impervious surfaces.

Integration with Existing Facilities

The DEIS should explore the extent to which proposed alternatives will integrate with existing transportation facilities. The document should discuss how the project will impact existing vehicle lanes, bicycle lanes and pedestrian paths due to project construction or operation. All potential alternatives should identify the opportunities available to better connect all modes of transportation, including heavy rail, light rail, bus rapid transit, standard bus service, and pedestrian and bicycle facilities. Measures to minimize or mitigate impacts to vehicle lanes, bicycle lanes, and pedestrian paths should be addressed in the DEIS.

Green Design and Construction

Green Infrastructure

EPA encourages Caltrans to implement "green infrastructure," such as bioretention areas, vegetated swales, porous pavement, and filter strips in any onsite stormwater management features. These features can serve as both stormwater treatment and visual enhancements. More detailed information on these forms of "green infrastructure" can be found at http://cfpub.epa.gov/npdes/home.cfm?program_id=298.

Industrial Materials Reuse and Recycling

For the construction of new infrastructure, EPA recommends industrial materials recycling, or the reusing or recycling of byproduct materials generated from industrial processes. Nonhazardous industrial materials, such as coal ash, foundry sand, construction and demolition materials, slags, and gypsum, are valuable products of industrial processes. Industrial materials recycling preserves natural resources by decreasing the demand for virgin materials, conserves energy and reduces greenhouse gas emissions by decreasing the demand for products made from energy intensive manufacturing processes, and saves money by decreasing disposal costs for the generator and decreasing materials costs for end users. EPA recommends that, for any new construction proposed, the DEIS identify how industrial materials recycling can be incorporated into project design. More information can be found at: http://www.epa.gov/epawaste/conserve/rrr/imr/index.htm.

Environmental Justice and Community Outreach

EPA is concerned that the project may result in disproportionately high and adverse impacts to low-income and minority populations throughout the project area and along adjoining corridors where traffic is affected by the project, especially portion of the I-710 immediately to the south. Executive Order 12898 addresses Environmental Justice in minority and low-income populations, and the Council on Environmental Quality (CEQ) has developed guidance concerning how to address Environmental Justice in the environmental review process (http://ceq.eh.doe.gov/nepa/regs/ej/justice.pdf). Future environmental justice analyses for this project and the DEIS should include 1) a description of the area of potential impact used for the analysis; 2) the source of the demographic information; 3) a determination as to whether direct, indirect, or cumulative impacts from the proposed alternatives may disproportionately and

adversely affect low-income or minority populations in the surrounding area. The DEIS should provide appropriate mitigation measures for any adverse impacts.

Caltrans should also document the public involvement methods used to communicate with potential environmental justice communities within the project area and provide an analysis of results achieved by reaching out to these populations. These methods include any newsletters and summary meeting notes that are made available, outreach to tenants in addition to landowners, and/or holding meetings during the evening or weekends when more of the working public would be able to participate. Assessment of the project's impacts should reflect consultation with affected populations. EPA has developed a model plan for public participation that may assist Caltrans in this effort. *The Model Plan for Public Participation*, EPA OECA, February 2000, is available at:
http://www.epa.gov/compliance/resources/publications/ej/model_public_part_plan.pdf.

Community involvement activities supporting the project should include opportunities for incorporating public input, especially in Environmental Justice communities, into the facility area design process to promote context sensitive design. In addition, the DEIS should demonstrate compliance with Title VI of the Civil Rights Act of 1964 which, in part, would include analyses for service equity and fare equity.

Recommendations:

- Define the potential environmental justice concerns, which is the first step in an environmental justice analysis. Include a discussion of any environmental justice issues raised during the scoping meetings. Also briefly discuss the key issues where environmental justice is potentially a concern, such as relocation, air quality, noise, vibration, access to property, pedestrian safety, etc.
- Define the reference community, which, combined with defining the affected community, is the second analysis step. This is a critical step since the definitions are used to analyze whether there are disproportionately high and adverse human health or environmental impacts by comparing the impacts to the affected population with the impacts to the reference community. For this project, the reference population could be defined as Los Angeles County, or potentially, a greater area of Southern California. The DEIS should briefly summarize the affected community and reference community.
- Thirdly, determine whether there are disproportionately high and adverse impacts, as detailed in the above-cited CEQ's "Environmental Justice: Guidance Under the National Environmental Policy Act" by considering the following three factors to the extent practicable for each of the identified potential environmental justice concerns:
  (a) Whether the health effects, which may be measured in risks and rates, are *significant* (in the context of NEPA), or above generally accepted norms. Adverse health effects may include bodily impairment, infirmity, illness, or death;
  (b) Whether the risk or rate of hazard exposure by a minority population or low-income population to an environmental hazard is significant (in the context of) and appreciably exceeds, or is likely to appreciably exceed, the

risk or rate to the general population or other appropriate comparison group; and
(c) Whether health effects occur in a minority population or low-income population affected by cumulative or multiple adverse exposures from environmental hazards.

- Accurately disclose whether or not the project will result in a disproportionate and adverse impact on minority or low-income populations. Ensure this conclusion is reported consistently throughout the DEIS. If a potential environmental justice issue has been identified, the DEIS should clearly state whether, in light of all of the facts and circumstances, a disproportionately high and adverse human health or environmental impact on minority populations or low-income populations is likely to result from the proposed action and any alternatives. This statement should be supported by sufficient information for the public to understand the rationale for the conclusion.
- Briefly summarize the findings, provide a reference to other relevant sections of the document which describe the specific impacts in greater detail (such as the noise and air quality sections), and comment on whether or not there is an environmental justice impact for those potential environmental justice concerns which are discussed in detail in other sections of the document.
- Propose appropriate mitigation if disproportionately high and adverse human health or environmental impacts on minority populations or low-income populations are likely to result from the proposed action and any alternatives.
- Describe involvement of affected community in proposing mitigation measures.

Cumulative Impact Analysis

Cumulative impacts are defined in CEQ's NEPA regulations as the impact on the environment that results from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such actions (40 CFR 1508.7). These actions include both transportation and non-transportation activities. The cumulative impact analysis should consider non-transportation projects such as large-scale developments and approved urban planning projects that are reasonably foreseeable and are identified within city and county planning documents.

The cumulative impact analysis should describe the "identifiable present effects" to various resources attributed to past actions. The purpose of considering past actions is to determine the current health of resources. This information forms the baseline for assessing potential cumulative impacts and can be used to develop cooperative strategies for resource protection (CEQ's Forty Most Frequently Asked Questions #19). In particular, the DEIS should identify the impacts of proposed projects on other segments of I-710 and connecting highways that have undergone or will undergo environmental review.

The DEIS should include a thorough cumulative impact assessment. The analysis should include a complete list of reasonably foreseeable actions, including non-transportation projects. EPA recommends the use of published cumulative impact guidance released by Caltrans. This

guidance can be found at: http://www.dot.ca.gov/ser/cumulative_guidance/purpose.htm. The eight steps included in this guidance are provided below.

Steps for Cumulative Impacts Analysis:

1) Identify resources to consider in the impact analysis.
2) Define the study area for each resource.
3) Describe the current health and historical context for each resource.
4) Identify direct and indirect impacts of the proposed project that might contribute to a cumulative impact.
5) Identify other reasonably foreseeable actions that affect each resource.
6) Assess potential cumulative impacts.
7) Report the results.
8) Assess the need for mitigation.

EPA appreciates the opportunity to provide scoping comments. When Caltrans initiates the Participating Agency requirements pursuant to SAFETEA-LU, please contact me at 415-947-4121 or ganson.chris@epa.gov. When the Draft EIS is released for public review, please send one hard copy and one disc copy to the address above (mail code CED-2).

Sincerely,

For Chris Ganson
Environmental Review Office

CC: Dale Jones, Caltrans
Garrett Damrath, Caltrans
Doug Failing, METRO
Stephanie J. Hall, U.S. Army Corps of Engineers
Cynthia Marvin, California Air Resources Board
Hasan Ikhrata, Southern California Association of Governments
Susan Nakamura, South Coast Air Quality Management District
Dr. Paul Simon, Los Angeles County Department of Public Health

James E. Stratton
Superintendent

Michael Leininger, Ed.D.
Assistant Superintendent
Facilities & Operations

Wendy Sinnette
Assistant Superintendent
Human Resources

La Cañada Unified School District

...a learning community committed to personal growth and academic excellence

April 14, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Delivered via email to Mr. Ron Kosinski at: *Ron_Kosinski@dot.ca.gov*

Re: Comments by the La Canada Unified School District on the Notice of Preparation and Scope of Environmental Impact Report/Environmental Impact Statement PM 26.7/32; State Clearinghouse No. 1982092310 - 710 Gap Closure

Dear Mr. Kosinski:

This letter is for the purpose of commenting on the Notice of Preparation and scope of the proposed Environmental Impact Report and Environmental Impact Statement for the "710 Gap Closure Project."

On June 22, 2010, the La Canada Unified School District (LCUSD) adopted "Resolution 22-09-10 Opposing the Tunnel Extension of the 710 Freeway" (attached). The Resolution passed unanimously. While the district understands that a tunnel option may be part of the scope of the EIR/EIS, we do not consider that option viable. Therefore, it is imperative that all other options/solutions, those with the least impact to the schoolchildren and their families, be diligently and thoroughly studied. The EIR/EIS needs to acknowledge that freight coming through the ports is already in containers that can be loaded and double-stacked on trains. The EIR/EIS must include alternatives, especially railroads, that can move freight efficiently and at the lowest possible pollution cost throughout the Los Angeles Basin.

Additionally, the cost of the "710 Gap Closure Project" is apparently currently unknown. Monies for any kind of public improvements are scarce and they often compete with dollars for our children. Therefore, we urge the environmental team to study the cost/benefit of any or all of these projects now, before launching into the rest of the study. If the cost is prohibitive, the rest of the study would be useless.

4490 Cornishon Avenue, La Cañada Flintridge, California 91011
Phone: (818) 952-8300 Fax: (818) 952-8331

The District educates approximately 4,000 children. There are other numerous private schools near the 210 freeway. Most of these schools have playing fields where children are actively breathing the air and currently being affected by freeway noise and pollution. We are deeply concerned about the health impacts on the community's children.

We urge the environmental study team to document projected increases in particulate matter, nitrogen oxides, sulfur dioxide and all hazardous air pollutants that affect the children living and going to school near the 210 freeway. Several studies have shown deleterious health effects on children who spend significant amounts of time near freeways. For example, the USC Keck School of Medicine Study showed that there were substantial deficits in the lung function of children who lived within 500 meters of a freeway. The EIR/EIS must make certain that proximity to a freeway with the anticipated traffic increases caused by the likely preferred project alternative will not have damaging effects on the health of sensitive receptors – especially children living or attending school within 500 feet of a freeway.

Cities in the Los Angeles basin have spent decades working to improve air quality. Our children and families are depending on you to find alternatives that protect this air quality and our long-term health.

Thank you for considering these comments.

Sincerely,

James E. Stratton
Superintendent

c: LCUSD School Board
City Council and City Manager, City of La Cañada Flintridge

4490 Cornishon Avenue, La Cañada Flintridge, California 91011
Phone: (818) 952-8300 Fax: (818) 952-8331

Metro

Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

April 13, 2011

Mr. Ron Kosinksi, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinksi:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for a Draft Environmental Impact Report/Statement (EIR/EIS) for the 710 Gap Closure Project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibilities in relation to the proposed project.

Because of the proposed project's close proximity to Metro transit service, the Draft EIR/EIS should consider construction activities that may impact Metro bus lines:

1. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Other Municipal Bus Service Operators including Foothill Transit may also be impacted and therefore should be included in construction outreach efforts.

Metro looks forward to reviewing the Draft EIR/EIS. If you have any questions regarding this response, please call Scott Hartwell at 213-922-2836 or by email at hartwells@metro.net. Please send the Draft EIR/EIS to the following address:

Metro CEQA Review Coordination
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Scott Hartwell

Sincerely,

Martha Welborne

Martha Welborne, FAIA
Executive Director, Countywide Planning

SOUTHERN CALIFORNIA

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April 1, 2011

Mr. Ron Kosinski
Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012
Ron_Kosinski@dot.ca.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the State Route 710 North Gap Closure Project [I20110020]

Dear Mr. Kosinski,

Thank you for submitting the **Notice of Preparation of a Draft Environmental Impact Report for the State Route 710 North Gap Closure Project [I20110020]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impact Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The objective of this project is to relieve congestion and improve mobility within the State Route 710 North Gap Closure study area.

Policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Visioning (CGV) that may be applicable to your project are outlined in the attachment. The RTP, CGV, and table of policies can be found on the SCAG web site at: http://scag.ca.gov/igr. For ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format (example attached).

The attached policies are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. **When available, please send environmental documentation ONLY to SCAG's main office in Los Angeles and provide a minimum of 45 days for SCAG to review.** If you have any questions regarding the attached comments, please contact Bernard Lee at (213) 236-1895 or leeb@scag.ca.gov. Thank you.

Sincerely,

Jacob Lieb, Manager
Environmental and Assessment Services

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE STATE ROUTE 710 NORTH GAP CLOSURE PROJECT [I20110020]

PROJECT LOCATION

Depending on the alternative selected, this project would be located in the study area bordered by Interstate 10 to the south, Interstate 605 to the east, Interstate 210 to the north, and State Route 2 to the west, in Los Angeles County, California.

PROJECT DESCRIPTION

The proposed project, depending on the results of a thorough environmental analysis of all possible transportation improvements during the NEPA/CEQA process, may include, but not be limited to: surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems, local street upgrades, traffic management systems and a no build alternative. There currently is a gap in the I-710 corridor, for a distance of approximately 4.5 miles (7.2 km), which extends between Valley Boulevard to the south and Del Mar Boulevard to the north. As originally identified in the April 13, 1998 Record of Decision for the Meridian Variation alignment, this gap contributes to congestion on local streets and the regional freeway system. The objective of this project is to relieve congestion and improve mobility within the study area.

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

The State Route 710 Gap Closure is included in SCAG's adopted 2008 Regional Transportation Plan (RTP) and in Metro's adopted 2009 Long Range Transportation Plan (LRTP). SCAG encourages Caltrans to consider and evaluate the potential for public-private partnerships (PPP) to fund the implementation of the project. Both the RTP and LRTP identify the gap closure as a PPP project. The use of PPP financing could be expected to affect the projected use of the facility, and therefore, the traffic and emissions analysis.

Regional Forecasts

SCAG is updating both the socioeconomic growth forecasts and the regional travel demand model for the upcoming 2012 RTP. In particular, the regional travel demand model is being updated to better address tolling and other transportation user fees. If the schedule for the DEIR/DEIS allows, SCAG encourages Caltrans to use the 2012 RTP forecast data and travel demand model enhancements for the analysis. The 2012 RTP is expected to be adopted by the SCAG Regional Council in April 2012.

The current SCAG growth forecasts are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region and impacted subregions are as follows:

Adopted SCAG Regionwide Growth Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted San Gabriel Valley COG Subregion Growth Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	1,998,852	2,079,788	2,160,039	2,238,951	2,315,243	2,388,057
Households	575,957	601,815	628,329	648,956	668,871	685,034
Employment	809,846	830,252	843,289	858,609	874,968	890,626

Adopted Arroyo Verdugo COG Subregion Growth Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	365,697	373,916	382,619	391,025	399,124	406,873
Households	132,663	136,143	139,810	142,671	145,436	147,710
Employment	204,693	211,686	216,150	221,399	227,003	232,368

Adopted City of Los Angeles Subregion Growth Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	4,140,516	4,214,082	4,292,139	4,367,538	4,440,017	4,509,435
Households	1,386,658	1,445,177	1,506,564	1,554,478	1,600,754	1,638,823
Employment	1,860,672	1,905,337	1,933,860	1,967,393	2,003,196	2,037,472

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008. City totals are the sum of small area data and should be used for advisory purposes only.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that may be pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

RTP G1 *Maximize mobility and accessibility for all people and goods in the region.*
RTP G2 *Ensure travel safety and reliability for all people and goods in the region.*
RTP G3 *Preserve and ensure a sustainable regional transportation system.*
RTP G4 *Maximize the productivity of our transportation system.*
RTP G5 *Protect the environment, improve air quality and promote energy efficiency.*
RTP G6 *Encourage land use and growth patterns that complement our transportation investments.*
RTP G7 *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

GV P1.1 *Encourage transportation investments and land use decisions that are mutually supportive.*
GV P1.2 *Locate new housing near existing jobs and new jobs near existing housing.*
GV P1.3 *Encourage transit-oriented development.*
GV P1.4 *Promote a variety of travel choices*

Principle 2: Foster livability in all communities.

GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
GV P2.2 *Promote developments, which provide a mix of uses.*
GV P2.3 *Promote "people scaled," walkable communities.*
GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

Principle 3: Enable prosperity for all people.

GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
GV P3.2 *Support educational opportunities that promote balanced growth.*
GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
GV P3.5 *Encourage civic engagement.*

Principle 4: Promote sustainability for future generations.

GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
GV P4.2 *Focus development in urban centers and existing cities.*
GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
GV P4.4 *Utilize "green" development techniques*

CONCLUSION

As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here: http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf

SUGGESTED SIDE BY SIDE FORMAT - COMPARISON TABLE OF SCAG POLICIES

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggested format is as follows:

The complete table can be found at: http://www.scag.ca.gov/igr/

- Click on ***"Demonstrating Your Project's Consistency With SCAG Policies"***
- Scroll down to ***"Table of SCAG Policies for IGR"***

SCAG Regional Transportation Plan Goals and Compass Growth Visioning Principles		
Regional Transportation Plan Goals		
Goal/ Principle Number	**Policy Text**	**Statement of Consistency, Non-Consistency, or Not Applicable**
RTP G1	Maximize mobility and accessibility for all people and goods in the region.	***Consistent:*** *Statement as to why* ***Not-Consistent:*** *Statement as to why* *or* ***Not Applicable:*** *Statement as to why*
RTP G2	Ensure travel safety and reliability for all people and goods in the region.	***Consistent:*** *Statement as to why* ***Not-Consistent:*** *Statement as to why* *or* ***Not Applicable:*** *Statement as to why*
RTP G3	Preserve and ensure a sustainable regional transportation system.	***Consistent:*** *Statement as to why* ***Not-Consistent:*** *Statement as to why* *or* ***Not Applicable:*** *Statement as to why*
Etc.	Etc.	Etc.

Ron Kosinski/D07/Caltrans/CAGov
04/15/2011 12:29 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: EIR/EIS for 710 Project

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:29 PM -----

Joel Shapiro <JShapiro@fc.spusd.net>
04/14/2011 07:39 AM

To <ron_kosinski@dot.ca.gov>
cc <sr710conversations@metro.net>
Subject EIR/EIS for 710 Project

Dear Mr. Kosinski,
Please see the attached letter, which I have also printed below. Thank you for your attention.
Joel Shapiro

Joel Shapiro
Superintendent
South Pasadena Unified School District
1020 El Centro Street
South Pasadena, CA 91030
(626) 441-5810, ext. 1100
(626) 441- 5815 fax

Challenging All Students for the 21st Century

April 13, 2011

Ron Kosinski
Deputy Director
Division of Environmental Planning
CalTrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinski,

As Superintendent of South Pasadena Unified School District, I am writing to express my concern regarding the potential impact of the SR-710 project on the health of the children in our community. There are five public schools in South Pasadena in close proximity to the proposed route of the SR-710 extension.

There are also private schools and pre-schools very close to the proposed route.

Numerous studies have pointed out that air pollutants from freeways extend further than previously thought. In one study of air pollution levels in ten Southern California cities, USC investigators found that proximity to freeways poses a respiratory risk, and that this risk may be related to an increase in asthma among children who live or attend school close to freeways. According to "Science Daily" (October 21, 2002), people near freeways are exposed to 30 times the concentration of dangerous pollutants. Two UCLA studies published in the Journal of the Air and Waste Management Association and in Atmospheric Environment indicated that people who live, work or travel within 165 feet downwind of a major freeway or busy intersection are exposed to potentially hazardous particle concentrations up to 30 times greater than normal background concentrations found at a greater distance. A study by investigators at USC published February 17, 2007 in *The Lancet* , showed that children living near freeway traffic had substantial deficits in lung function development between the ages of 10 and 18 years. According to lead author W. James Gauderman, "an individual with a deficit at this time will probably continue to have less than healthy lung function for the remainder of his or her life."

A tunnel extension of the SR-710 Freeway also poses serious health risks for the children of our community. According to an Australian study of 2009, tunnels concentrate air pollution by 1000 times. A toxic cocktail of ultra fine particles is lurking inside road tunnels in concentration levels so high they have the potential to harm drivers and passengers. Not only would excessive pollution be found inside the tunnel; it would also spew from four vents (each 100 feet or 10 stories high) and at each end portal.

Based on the very real concerns regarding the impact of the SR-710 extension on the health of the children of our community, it is important for the Environmental Impact Report and Environmental Impact Study (EIR/EIS) to be as thorough as possible. I strongly urge that a Health Risk Assessment (HRA) and Health Impact Assessment (HIA) be conducted to analyze the potential levels of pollution as well as the possible means of mitigation. At this time, there is no evidence that there are plans to mitigate the significant health consequences of the pollutants that would be expelled through the portals, smoke stacks, or other venting mechanisms. There needs to be an analysis of potential hot spots along the proposed route of the extension.

I also have a concern about the potential deleterious health impact on

neighboring communities, and I would hope that the EIR/EIS thoroughly analyzes the health risks to the entire area affected by the proposed SR-710 extension. As the head of South Pasadena's public schools, I have a special responsibility for the health and safety of the children of our city. Therefore, I urge you to include the measures that I have mentioned in the EIR/EIS. I thank you for giving this matter your prompt and serious attention.

Sincerely,

Joel Shapiro

Superintendent Letter to CalTrans re 710.doc

ST. FRANCIS HIGH SCHOOL
Est. 1946

Office of the President

Capuchin Franciscan

April 14, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Delivered via email to Mr. Ron Kosinski at: *Ron_Kosinski@dot.ca.gov*

Re: Comments by the La Canada Unified School District on the Notice of Preparation and Scope of Environmental Impact Report/Environmental Impact Statement PM 26.7/32; State Clearinghouse No. 1982092310 - 710 Gap Closure

Dear Mr. Kosinski:

This letter is for the purpose of commenting on the Notice of Preparation and scope of the proposed Environmental Impact Report and Environmental Impact Statement for the "710 Gap Closure Project."

Our school educates 600 children. Of primary concern are our children, who are here at school at least 5 days per week and even more frequently when they participate in extra-curricular activities. We are in direct proximity to the 210 freeway. Our children are actively breathing the air and being affected by freeway noise and pollution currently. We are deeply concerned about the health impacts on our children, along with our staff.

While we understand that a tunnel option may be part of the scope of the EIR/EIS, we do not consider that option viable. Therefore, it is imperative that all other options/solutions - those with the least impact to the schoolchildren and their families- be diligently and thoroughly studied. The EIR/EIS must include alternatives, especially freight to rail that can move that freight efficiently and at the lowest possible pollution cost thought the Los Angeles Basin.

Additionally, the cost of the "710 Gap Closure Project" is apparently currently unknown. Monies for any kind of public improvements are scarce and they often compete with dollars for our children. Therefore, we urge the environmental team to study the cost/benefit of any or all of these projects now, before launching into the rest of the study. If the cost is prohibitive, the rest of the study would be useless. Furthermore, it is our understanding that to build the tunnel, a public/private partnership is needed. We understand that the State Legislative Analyst's Office has stated that this method of financing may be impermissible. It is important that the method chosen to build any of

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these projects be known now to be legally permissible before proceeding with any further study or expending significant dollars.

Although many previous studies have shown substantial impact to the community of La Canada Flintridge, the Initial Study Area does not include La Cañada Flintridge at all, thereby excluding our school. You must include La Cañada Flintridge in order to study the impacts that we believe will be substantial. Failure to study the area would very likely render your study invalid.

Several studies have shown deleterious health effects on children who are near freeways, even increased mortality rates in later life. For example, the USC Keck School of Medicine Study showed that there were substantial deficits in the lung function of children who lived within 500 meters of a freeway. Another recent study by the Children's Hospital Los Angeles established a link between proximity to a freeway and autism. The EIR/EIS must make certain that proximity to a freeway with the anticipated traffic increases caused by the likely preferred project alternative will not have damaging effects on the health of sensitive receptors – especially children living or attending school within 500 feet of a freeway. These alarming findings must be taken into consideration within the EIR/EIS.

Our children and families are depending on you to find alternatives that protect our air quality and our long-term health.

Thank you for considering our comments.

Sincerely,

Fr. Tony Marti, OFM. Cap.

Fr. Tony Marti, OFM Cap.
President

cc: _____, _____
City Council and City Manager, City of La Cañada Flintridge

alhambra
CHAMBER OF COMMERCE

received 4/15/11

April 11, 2011

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street – Mail Stop 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

RE: Support for the 710 Gap Closure Project and the Environmental Review.

This letter is being sent to you to underscore the fact that we are on record supporting the 710 Gap Closure Project. We specifically support a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed with the minimum of delays.

Please include the following in the environmental analyses:

- The EIR should show how all of the freeways and major roads in the area in all four directions will benefit from the gap closure. The gap has been in existence for nearly 40 years creating serious congestion and health concerns for drivers and resident alike. - Let's fix this now!

- Our commutes will be easier and take less time going to and from work. The EIR should take into account how closing the gap improves the quality of life for many people and reduces the cost of commuting for everyone in the region.

- Air quality will be substantially improved in the entire basin; and existing areas suffering from the adverse health impacts will be relieved as well. The EIR should demonstrate how completion of the 710N Gap will improve air quality in the region.

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- A more immediate benefit to the region during these tough economic times will be the jobs created during the construction phase. The EIR should detail how the project helps our local economy in creating jobs. There is also an indirect benefit to one of Southern California's most important industries – tourism. Visitors to Los Angeles will actually be able to reach their destinations more efficiently and more economically when using the 710N freeway rather than being routed through local communities.

We have not forgotten the fact that we voted, along with2/3 of all Los Angeles County voters for Measure "R" calling for the 710N freeway to be completed. Please expedite the environmental process and complete the 710N Gap Closure.

We cannot wait another 40 years for this project to become a reality.

Sincerely,

Owen Guenthard

Owen Guenthard, Executive Director
Alhambra Chamber of Commerce

City of Alhambra
Office of the Mayor and City Council

RECEIVED 4/14/11

April 14, 2011

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 S. Mail St., Mail Stop 16A
Los Angeles, CA 90012

Gateway to the San Gabriel Valley

111 South First Street Alhambra California 91801

626 570-5010

FAX 281-2248

RE: 710N Gap Closure Project; Response to 3-1-11 Notice of Scoping/Initiation of Studies

Dear Mr. Kosinski.

The City of Alhambra welcomes the opportunity to participate in helping define the areas of study for environmental clearance of this important, 40 years overdue, eagerly awaited, regional transportation project. It is obvious to all who use the freeway system, even without the background and history of CalTrans' highway planning and construction program, that the north/south 710 was intended to connect east /west traffic on the 10 and 210 to points south and facilitate traffic between the 10 and the 210 and the 710 to points north.

It is further obvious to all where the gap exists and where the final route, regardless of type of construction (surface or tunnel) should be; as evidenced by the connecting freeway stubs at the 10 and the 210, signage and the irrefutable fact of CalTrans owned right of way.

I. Background

Our first request is that the EIR/EIS reflect the fundamental cause of the 40 year waiting period for this project and use this history in the assessment of equity and environmental justice in the document. The fundamental cause occurred in the early 1970's when the City of South Pasadena, CalTrans and FHWA privately stipulated to a court injunction halting construction within the gap. None of those three agencies notified The City of Los Angeles, The City of Alhambra or the City of Pasadena, that they were about to hand a judge an agreed upon stipulated injunction which would (and has for over 40 years) substantially injure those cities and those who live in, work in, shop in, and drive through them.

For years, the governmental agencies have refused to allow participation by the impacted jurisdictions. The privately agreed upon injunction, issued summarily by the court without public notice of any kind, left those impacted jurisdictions without

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remedy of any sort. All of the impacted cities at one time or another sought to intervene in the case(s). South Pasadena and the other Governmental Entities opposed intervention each time it was brought before the Court.

Challenges continue into the new Millennium. Following passage of the Measure "R" Sales Tax Ordinance in 2008, the cities of South Pasadena and LaCanada-Flintridge filed an unsuccessful lawsuit seeking to delete the 710N Gap Closure from the list of projects approved by the voters. Attachment A is a March 25, 2011 Memorandum from the County of Los Angeles, Office of the County Counsel to the Metro Directors informing them of the Court's decision.

Can there be any question whatsoever that in these 40 years traffic congestion has increased perhaps at least 40 times? Can there be any question whatsoever that in these 40 years air pollution has increased perhaps at least 40 times? Every official study shows that congestion and bad air have increased substantially since the Gap was stopped, and, regardless of the many strides in cleaning up the air, significant health impacts exist in the gap area. In these days of gridlock and air quality health concerns, gap closure must be looked at as a regional solution to a regional problem.

But does it really take a study to realize that bad air quality and severe traffic congestion are bad for us? The fact that 40 years have passed should be enough proof if one drives or breathes. There is no valid reason why a few should continue to visit tyranny on the vast majority of humans who live and work and play and visit and drive in the region.

II. ISSUES TO BE ADDRESSED IN EIR/EIS AND LEVEL OF ANALYSIS

The EIR/EIS level of analysis is, in our view, threefold. First are local conditions, second are area wide conditions and third are regional conditions and considerations. We will address these specifically within our recommended issue areas to assist in the development of comprehensive baseline conditions.

Baselines in the Environmental Setting section (CEQA 15125) will need to be expanded beyond the project area shown in the NOP/NOI notices for certain analyses. For example, in order to adequately address the Gap Closure's far reaching benefits on the freeway system, the I-5, I-10, I-210, I-710, I-605, I-110, SR 134 and SR 118 and possibly the 1-15 and 1-215 will need to be studied with and without the project. The future construction of the High Desert Corridor and SR138 may also need to be evaluated. A description of the function of the 710 gap area in the original freeway plan that called for the connection of the 10 to the 210 via the 710, and the role this

gap closure will play in the more efficient operation of the other freeways should be described.

There is much interest in a multi modal alternative that does not include construction of a freeway to close the Gap. It is essential that the current landscape regarding number and percentage of vehicular trips vs. number and percentage of transit trips be described in order for an analysis to be performed to quantify such an alternative's' ability to meet project goals and objectives and the Statement of Purpose and Need.

An important baseline to be documented in the Environmental Setting section is the role of the Gap Closure in long standing regional and local planning. The Southern California Association of Governments' federally mandated Regional Transportation Plan (RTP) has included the gap closure as a necessary infrastructure project in the region since 1989 and in its Regional Transportation Improvement Plan (RTIP) since 1991. The modeling that supports the Plan, and is required to be accepted by the federal government every four years, assumes the gap closure project to be built and operating in the horizon year of the Plan.

All other regional plans that rely, according to their specific legal planning requirements, on the RTP, such as the Blueprint Compass Plan, AQMD Plans, Regional Housing Allocation Plans, SB 375 Sustainable Communities Strategies, etc. also use these same assumptions. Large scale public and private development projects EIR's use these assumptions (e.g. the 710S EIR/EIS, I-210 Freeway EIR/EIS, etc.). All county CTC's in the six county region use these same assumptions in their plans and studies (e.g. current Congestion Pricing Studies, HOT Lane studies, Truck Studies etc.) Many local General Plans use RTP projections and also assume the closure of the Gap in their planning periods.

These relationships must be detailed in the EIR/EIS setting so that adequate analyses can be made on alternatives, all impacts disclosed and cumulative impacts be defined. This baseline is further extremely important in the comparative analysis between alternative transportation modes and potential route designations for the Gap closure.

Issue AREA: Economic Impacts

There are many possible economic impact areas to be studied for this project: job creation, savings for reduced commuter hours, possible construction impacts on area businesses along construction route, savings for the improved flow of goods, services and people through the area, opportunities for land use change at portal locations (for

a tunnel alternative), potential loss of business and businesses themselves (for a surface route), etc. In Alhambra, we expect the analysis to show a positive economic impact when the through traffic destined for points north/south that does not stop in our City is off the streets as local business access will then be enhanced.

We note the analysis of project economic impacts, the actual projected costs of projects; project financing and cost-benefit analysis should not be included in this section. Our understanding is the cost estimates of a project and/or its alternatives and project financing are not environmental issues per se. Thus, dueling cost estimates for specific projects and the various approaches to financing a gap closure shall not be addressed here; only to request if such information is necessary to the EIR/EIS that reputable sources be used.

Issue AREA: Truck Traffic

A concerted campaign of misinformation and distortions at public meetings and in the press has been undertaken in approximately the last 18 months by elected officials and representatives from cities in opposition to the Gap being closed. This campaign has been based on an unfinished, unreleased, outdated, preliminary draft report never available to the public, called the "I-710 Missing Link Truck Study". Underway for almost 8 years, the unsubstantiated" findings" were based on a flawed methodology using 10 year old data and unsupported, theoretical assumptions. The preliminary report was so flawed that the preparer, the Southern California Association of Governments, does not stand by the work and will not complete it.

Attachment B is a December 1, 2010 letter from SCAG Executive Director that states in part:

> ...the draft scenario analyses of impacts on localized traffic should not be interpreted as a current, typical, environmental traffic impact report.....no additional work is contemplated by SCAG.....

Mr. Ikhrata further stated unconditionally, at a June, 2009 SCAG Transportation Committee meeting, that "this study does not change or refute any of the long standing research and previous studies documenting the undeniable benefits of the I-710 Gap closure that have been prepared by SCAG, Metro and CalTrans."

Any and all references to this study or subsequent materials developed by the aforementioned cities based on this study must **not** be used in the EIR/EIS analysis. It has no standing whatsoever and to do so would create an opportunity for immediate challenge to the EIR/EIS, something we hope all parties wish to avoid.

There are resources and legitimate studies at SCAG that will be pertinent to the EIR/EIS. The assumptions in the current modeling efforts for the 2011 RTP with regards vehicle vs. truck percentage usage split have immediate relevance to the EIR/EIS. We suggest the alternatives analysis use these models to analyze the benefits of truck prohibitions in each gap closure alternative.

We further request the EIR/EIS examine the much repeated assumption that the 710N gap project is being worked on in order to facilitate the ports expansion plans. Information should be included about the destinations and routes of port truck traffic, existing and projected, and the ability of potential grades of either a tunnel freeway or surface freeway to accommodate such truck traffic. The findings of the current I- 710 SOUTH EIR/EIS analysis should be referenced and possibly used as baselines in the gap closure EIR/EIS.

Issue AREA: Congestion

Regionally, the overall improvement in the freeway system operations and elimination of bottlenecks need to be documented. Subregionally and locally, the EIR/EIS must define the existing traffic on city streets that is through traffic and the benefits thereby accruing (e.g. public safety, air quality improvements, etc) once freeway traffic is on the freeway.

The resulting access of 10 Freeway traffic seeking the 210 Freeway may increase the 210 freeway volumes, but not on a 1:1 basis. After all, the traffic now using city streets to make their connection to the 210 are already on the 210; it just takes them longer and creates a multitude of negative impacts locally to get them there. We request this ratio be examined and incorporated into the analysis of potential traffic volume increase on the 210 Freeway.

Additionally, we note the 210 has been expanded well after efforts to stop gap construction were successful over 40 years ago (as addressed earlier). We request documentation and specific statements in the EIR/EIS that the 210 Freeway expansion was made assuming the 710N Gap would be connected and that any potential increase in traffic volume was used in the resulting capacity design of the 210 Freeway.

The design and resulting new traffic patterns around portal locations (for a tunnel) and around major arterials (for a surface route) need to be examined for the possibility/opportunity for traffic improvements in the areas. The EIR/EIS should

recognize the burden on the Alhambra street system for accommodating 40 years of SR 710N traffic and identify mitigation measures for same.

We request the EIR/EIS designate the South Portal Tunnel location as south of Valley Boulevard (in contrast to an error in the Tunnel Technical Study which identifies the Portal in Zone 3 as north of Valley) and thoroughly examine potential land use changes in the surrounding area that utilize the location to maximum public benefit. This may include provision for transportation mode changes; perhaps giving transit riders an alternative to going east from here instead of going to downtown Los Angeles first.

Issue AREA: Public Safety

We request public safety be a topic in the EIR/EIS, not only for potential Tunnel mishaps, but to analyze the implications of the congestion, current and projected, on city arterials now carrying 710N through traffic. Accident rates, emergency vehicle response times and disaster routes access will improve when the gap is closed and such analysis is pertinent to defining public benefits for this project and in the alternatives analysis.

Issue AREA: Air Quality

There has been increasing public concern about unhealthful air quality near schools. CEQA section 15186 provides criteria for when additional air quality analysis and health risk assessments based on air dispersion modeling are required. Such additional analysis would be required for the surface route alternative and the No Project alternative, assuming there are school facilities which meet the proximity criteria. In the tunnel alternatives, no such analysis would be required assuming maximum air scrubbing and the location of air release vents away from the proximity criteria.

The potential net additional traffic on the 210 from closing the gap is not a "project near schools" under 15186 definitions and the actual location of the gap closure "facility" does not meet proximity criteria. No additional analysis under this section should be performed in the EIR/EIS for communities along the 210 Freeway.

We request the air quality analysis in the EIR/EIS be performed in a manner consistent with the federal and state modeling requirements of the RTP analysis and the AQMP analysis. We do not support any method of analysis that relies on an extrapolation methodology from specialized, small sample area studies. The EIR/EIS should not only define the significant regional air quality improvements that accrue

from closing the Gap, but also the local improvements in cities currently accommodating the 710 through traffic..

Alhambra residents have suffered enormous air quality impacts over the last 40 years as have other communities that accommodate the 710/210 traffic demand on local streets. These impacts need to be quantified in some way so a comparison can be made on the long term cumulative impacts already suffered in Alhambra and elsewhere from slow moving congestion at street level to those I-210 and Crescenta Valley communities that may experience additional incremental air quality impacts along a freeway. The Environmental Justice section of the EIR/EIS needs to further explore this subject; including reference to the No Project air quality analysis which will show the increased significant burden in Alhambra to an insignificant impact in the I-210 and Crescenta Valley communities should the Gap not be closed.

Issue AREA: Environmental Justice

The Environmental Justice analysis must look beyond the characteristics of the population and consider the unique circumstances of a project being contemplated 40 years after construction was stopped. We believe the quality of life in surrounding communities and along the I- 210 has been enhanced to the detriment of Alhambra's and others bearing the burden of continuous through traffic bound for a freeway. That the communities opposing the Gap are, for the most part, higher income white communities does not tell the entire story.

The costs to Alhambra have been high in terms of health impacts, loss of use of outside open space areas to local residents for whom they were built and increased accident and increased public safety response times. Alhambra's population decreased from the 2000 census to the 2010 census; evidence of a declining quality of life and loss of perceived desirability of its residential areas.

The communities opposing the Gap Closure have had a benefit not available to Alhambra; namely, those communities knew where the freeways were and would be constructed or expanded (such as the I-210 expansion completed in 2007). Thus they have had an opportunity to plan compatible adjacent land uses and buffers. Alhambra did not have this opportunity and, as a result, has schools and other sensitive land uses located in what are currently less than desirable locations (e.g. one school is on the corner of the 710 local street terminus) that would not have been placed there had we known our streets would be the de facto 710N Freeway.

III. POTENTIAL ALTERNATIVES IDENTIFICATION/LEVEL OF ANALYSIS

The Gabriel River Infrastructure Development (GRID) Project Potential Alternative

GRID is a long term concept proposed by a resident that seeks to unite infrastructures for trade, energy and Los Angeles/Long Beach port traffic to be funded by eliminating six current infrastructure projects including the widening of the 710S Freeway, two port expansions, two upgrades of port rail facilities and the 710N Gap Closure project. The vision highlights a subterranean cargo-moving tunnel network from the ports along the San Gabriel River to warehouses in the Inland Empire and includes a high-tech port transfer facility and energy transmission upgrades.

No formal analysis or study of GRID has been done, nor has the concept been proposed to those agencies responsible for such studies. A project EIR/EIS is not the place for such an analysis.

There are many problems in trying to identify GRID as a potential, viable alternative to the 710N gap closure. It does not meet the criteria for improving regional mobility of people and services and those goods not destined for the Inland Empire. Commuters will still need to get back and forth to work and local communities will still need to find solutions to getting regional through traffic off local community streets and back onto the freeway network.

CalTrans and Metro should reject GRID at the end of scoping as being infeasible and failing to meet the Gap Closure project objectives. An EIR is not required to address alternatives which are infeasible. No further analysis is warranted in the EIR/EIS per CEQA 15126 and the concurrent NEPA sections.

A positive item of note is that public discussion of the GRID alternative has resulted in the developing support for tunnel technology in general as a transportation infrastructure solution in some of the areas where a potential gap closure tunnel may be built.

City of South Pasadena's Multi Mode Low Build Proposal: Potential Alternative

This proposal has been around since at least the last 10 years and we have heard it mentioned again in the gap closure scoping sessions, called both the "Low Build Alternative" and the "Multi Mode Alternative".

The proposal seeks to move the terminus of the 710N Freeway from Valley Boulevard in Alhambra to Mission Boulevard/Alhambra Avenue in Alhambra while decreasing speeds and reducing capacity on South Pasadena streets and adding a freeway interchange at the 110 Freeway and Fair Oaks in South Pasadena. The proposal includes increased transit service, the addition of transit feeder lines and traffic improvements at the proposed southern terminus at Mission Road, elimination of the 710N terminus stub and improved freeway access to/from Route 134 and 210 onto Colorado Boulevard, Green and Union Streets in Pasadena.

In April, 1996 CalTrans District 7, the Office of Regional Transportation and LARTS published an exhaustive evaluation of the proposal entitled "State Route 710 A Modal Evaluation of the City of South Pasadena's Multi-Mode Low Build Proposal "and analyzed the proposal compared to a freeway gap closure alternative. (The Report uses the terms Build, No Build and Low Build for the analysis.) The findings of the Report are unequivocal; here are a few examples quoted from the Report:

-the Low Build proposal proposes spending a significant amount of money to get a negative or at best a negligible benefit in almost all categories in fulfilling specific local and regional transportation needs.

-the South Pasadena Low Build Multi-Modal Proposal in many ways makes matters worse than doing nothing at all as traffic along city streets in the corridor is more congested, overall transit usage goes down, and at best the Low Build does nothing or actually worsens the freeways that remain

-the Build Alternative provides substantial relief to nearby freeways

-the Build Alternative demonstrates specific advantages over the No Build Alternative as traffic flow on the streets within the corridor is less congested and building the 710 also helps relieve some of the bottlenecks in north/south traffic through the region via I-5.

-completion of the 710N would provide faster access to the corridor for emergency vehicles

-completion of the 710N would provide additional alternate routes on the freeway system in the event of a natural disaster

There is no need for an update or further study of this proposal in the Gap Closure EIR/EIS. The city of Los Angeles, Metro and CalTrans agree as evidenced by the July, 2010 final action by Metro Board deobligating "Rogan Funds" for the SR710 Access Road Extension from Valley Blvd. to Alhambra Rd. project. We note no individuals or public entity representatives testified in support of continuing the Connector Rd. project study. The City of Alhambra does not support ANY alternative that continues the use of City arterials or streets as the 710N freeway.

We request that CalTrans note the 2010 disposition of this Rogan project and include the 1996 Report as an appendix to the Scoping Report and/or in the Administrative Record to support the finding that the City of South Pasadena's Multi-Mode Low Build Proposal and the Valley Blvd/Alhambra Rd Connector were rejected as infeasible during the scoping process because of the demonstrated failure to meet the basic project CEQA objectives (e.g. increased mobility and improved air quality) and the NEPA Statement of Purpose and Need.

710N Surface Route Potential Alternative

Substantial information and data exists on the environmental impacts of this alternative; however, none is available in a properly certified environmental document. There is existing CalTrans owned right of way for this alternative. Previous attempts by CalTrans to bring this alternative to fruition have been stopped by the courts, as described earlier. However, given that the injunction stopped construction of this alternative pending additional environmental review, it appears more than appropriate that the EIR/EIS for the 710N Gap Closure Project should include this alternative and, indeed, perform additional environmental review.

The inclusion of this alternative and the analysis of a surface route compared to a potential tunnel route and possible other gap closure alternatives will be instructive and important in the final decision making to select a mode and route for the gap closure. We strongly request the surface route alternative be examined thoroughly in the EIR/EIS and its environmental impacts and social impacts be compared to a potential tunnel solution.

One further note in support of inclusion of this alternative is the political attempt in SB545 to remove a surface route from all future consideration of the 710N Freeway completion. The 2009 Governor's veto message stated, in part, "...the project development process currently being undertaken by CalTrans and Metro is the appropriate vehicle to determine the scope and feasibility of a project to address the transportation needs in the I 710 corridor....there is absolutely no need to enact statutory restrictions that would mandate certain project design options or remove others from potential consideration...".

Potential Tunnel Alternatives and Routes

As an involved participant and city member of the recent Tunnel Study Committee, Alhambra is familiar with the findings of the **Caltrans SR 710 Tunnel Technical Study, October 2009**. Five potential tunnel zones were studied to determine the geologic, groundwater and seismic conditions that affect the technical feasibility of designing and construction a tunnel to close the 710 gap. All five zones were found to be feasible for tunnel construction and route development.

The Tunnel Technical Study was an exhaustive examination of the five zones with a representational area wide committee review structure and public review of findings along the way. The analysis remained "route neutral" in response to public input. Thus there are no recommendations or conclusions in the study about which zone is the most desirable place to build a tunnel. Building on this study going into the environmental phase provides a strong foundation for an analysis leading to identification of the environmentally superior tunnel zone and route.

An underlying understanding during preparation of the Technical Tunnel Study was that all potential 710 freeway routes within a tunnel would be entirely contained within one of the zone areas under study. The Study approach and work plan was designed and amended with public input. Any requests/suggestions for additional zone areas to be studied at this time should be considered a delay tactic to EIR/EIS completion and rejected by CalTrans and Metro.

When other factors are considered, such as tunnel length, cost, relative disruption to the environment of each zone through existing urbanized areas, ability of each zone's potential route and freeway connections to meet the goals of the gap closure project, site suitability, increase in jurisdictional boundary crossings, etc. it becomes evident that Zones 1, 4 and 5 from the SR 710 Tunnel Technical Study should be eliminated from further study at the end of scoping per CEQA Section 15126 and the applicable NEPA sections.

We request that Tunnel Zone 2 and Tunnel Zone 3 be analyzed in detail in the EIR/EIS. Two tunnel zones with a route identified in each based on technical feasibility should be studied in order to identify the preferred tunnel zone and freeway route. These results can then be compared and contrasted with any other potentially feasible alternatives in the EIR/EIS. Zone 2 and Zone 3, by reason of their locations, best meet the gap closure goals to produce a project that minimizes impacts in local communities to acceptable levels and the Statement of Purpose and Need to improve

regional mobility and accessibility and reduce circuitous out-of-direction travel on the network. The elimination of Tunnel Zones 1, 4 and 5 at the end of scoping further meets the June, 2010 direction of the Metro Board of Directors in moving forward with environmental review the 710 N Gap Closure Project.

Potential "Hybrid" Alternative: Bus and/or Rail Transit and/or HOV with a Tunnel or Surface Route

The State and public agencies in southern California such as Metro, Metro link and other county CTC's have made significant investment in providing a transportation system for vehicles and for transportation alternatives to the single occupancy vehicle. These investments include the freeway system, light and heavy rail, buses, connector services, HOV and future HOT lanes. All give the public opportunities for choice and have played an important part in our ability to accommodate past and future population and economic growth.

The gap closure represents an important and integral part of these systems, namely the completion of the freeway system. However, in order to increase the opportunities to maximize public investment in all our transportation systems, the gap closure alternatives studied in the EIR/EIS should include one that demonstrates the best way to connect the freeway with higher occupancy systems. This could include an HOV lane as part of the freeway, multi modal connections at portal areas, etc.

No Project Alternative

The No Project analysis required in the EIR/EIS is extremely important to Alhambra and other cities that currently bear the burden of the 710 through traffic, north and south, in their communities. The analysis of this alternative must utilize the baseline conditions established in the review of all alternatives and apply those conditions to the current, existing conditions in Alhambra as well as project future conditions in all issue areas (e.g. congestion, noise, air quality, health impacts, environmental justice, economic impact, etc). Thus, current data must be collected in Alhambra and other community impact areas, including traffic counts on local arterials and roads, air quality readings at the several schools in the current routes for SR 710 through traffic and the like. Mitigation for the No Project alternative must also be identified that would reduce this alternative's impact to acceptable levels.

The consequences of the No Project alternative are not only for the immediate impact areas just described. There is significant environmental impact and possible regional jeopardy if the No Project alternative becomes the preferred alternative at the conclusion of the EIR/EIS preparation. Thus the analysis must further examine the consequences of having the gap closure project removed from the Regional Transportation Plan, The Long Range Plan, local General Plans and all studies and environmental documents currently being prepared (e.g. the 710S EIR/EIS) and large scale public and private development project EIR's over at least the last 10 years.

As discussed previously, the gap closure is an integral, extremely important regional infrastructure improvement long anticipated to be completed by the 2020's. Given anticipated planning time, design and construction times, should the No Project alternative prevail in the current attempt to close the gap then these regional planning projections and analysis assumptions will need to be revised. The EIR/EIS analysis must examine these consequences, including the resulting inability of the region to meet the requirements of the Clean Air Act and these impacts on funding and revenue.

IV. LONG TERM PUBLIC SUPPORT FOR CLOSING THE GAP

The 710N Gap Closure project has overwhelming local and regional public support that may not be fully recognized. We request the actual number of persons as described below be included in any summary of persons for or against the Gap Closure Project.

Attachments C, D and E include three documents we have previously requested be a part of the record. Attachment C is the actual vote count for Measure "R" which passed with 67.93% of the voters or 2,039,214 persons in support of the ballot measure and its projects, of which the 710N Gap Closure is one. Attachment D is the City of Pasadena's March, 2001 Ordinance No.6851, favoring completion of the 710 freeway between the I 210 Freeway and the I-10 Freeway, which passed with 58.3% of the voters or 9,654 in support. Attachment E includes letters from national, state, subregion and local officials and organizations who have written in the recent past in strong support of closing the gap. This set includes a series of scientific polls taken by independent, well known pollsters from 1998 to 2006 detailing polling results, by community, that exhibit constant, consistent long term support to close for this project.

We thank you for your attention in reviewing our comments, thoughts and recommendations for the Gap Closure project EIR/EIS. We look forward to a robust, complete, professional and fair environmental process. We have great confidence that once completed, significant advances can be made on environmental issues not only in the region, but to everyone living in each City involved in the completion of the gap.

Sincerely Yours,

Gary Yamauchi, Mayor
City of Alhambra

CC: City Council
Julio Fuentes, City Manager

ATTACHMENTS:

A. County of Los Angeles, Office of County Counsel Memorandum, March 25, 2011
B. Southern California Association of Governments Letter, December 1, 2010
C. City of Pasadena Ordinance NO. 6851, March 29, 2001
D. County of Los Angeles, Department of Registrar-Recorder/County Clerk, November 4, 2008
E. Public Support Letters, May 27, 2010

ALHAMBRA
UNIFIED SCHOOL DISTRICT
OFFICE OF THE SUPERINTENDENT
Donna M. Pérez
1515 West Mission Road, Alhambra, CA 91803
Phone: (626) 943-3330 FAX: (626) 943-8050

April 12, 2011

RECEIVED 4/14/11

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street, Mail Stop 16 A
Los Angeles, CA 90012

Dear Mr. Kosinski:

RE: Support for the 710N Gap Closure Project and Comments for Environmental Review

As Superintendent of the Alhambra Unified School District (AUSD), I would like to be on record stating that our Board of Education members and I fully support a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210.

The Alhambra Unified School District has always been a strident proponent of the completion of the 710N Freeway. The District serves over 18,000 students. At peek traffic times our students walk to and from school each day along streets clogged with the traffic resulting from the gap in the incomplete 710 Freeway, their safety always a concern. All day and all night they breathe the exhaust from the engines that spend vastly more time in the vicinity than they would if the 710 Freeway were complete and the cars and trucks could move through the region quickly and efficiently. Surface streets now carrying north/south 710 Freeway traffic were not designed to safely handle such large volumes of vehicles. Accordingly, the safety of children walking along such streets is presently compromised.

Non-completion of the 710 Freeway not only causes regional traffic issues, but also presents hazardous health issues for our students. Asthma is the most common chronic disease of childhood, affecting approximately 7 percent of students in the Alhambra Unified School District. Over the last seven school years, there has been an increased trend in asthma diagnosis, need for asthma medication at school, and health office visits related to asthma, all requiring care from school nurses and health assistants.

The number of AUSD students with asthma has increased from 1,135 in the 2002-2003 school year to 1,408 students in 2008-2010, for a 24% increase in asthma diagnosis. During this same time frame, for example, Fremont Elementary School has had a 33% increase in the number of students diagnosed with asthma. The number of students requiring quick relief asthma inhaler medication at school has increased 22% district-wide from the 2002-2003 school year to the 2008-20010 school year. During this same time period, Fremont Elementary School has had a 75% increase in asthma medications and Emery Park Elementary School a 42% increase in asthma medications.

Since the 2003-04 school year, the number of students with visits to the school Health Office (HO) due to asthma has increased. However, one school, Fremont Elementary School, has shown a dramatic increase in the number of HO visits due to asthma, from 11 HO visits in 2003-2004 to 86 HO visits five years later for an approximate 680% increase in HO visits. While there may be numerous factors related to the increase in HO visits due to asthma, it should be noted that Fremont is the school that is directly situated next to an impacted freeway. Since the playground directly abuts the road, students have greater exposure to auto exhaust fumes.

The District is committed to the safety of its children and to a safe environment for them to get to school and go home from school each day. Nothing can justify one child's death or injury from an auto accident or respiratory distress. The well-being of our children must come first. Non-completion of the 710 Freeway causes unsafe conditions and jeopardizes the lives of many of our students.

We are asking that as Metro and CalTrans are working to determine the content of the EIR/EIS and what the route and construction type will be, you include several items in the environmental analyses. The EIR should show how all freeways and major roads in the area will benefit from the closing of the gap. Actual project benefits should demonstrate that air quality will be substantially improved in the entire basin, and existing areas suffering from adverse health impacts will be relieved. Additionally EIR should take into account how closing the gap improves the quality of life for many people including the students of AUSD. Please also detail how the project helps our economy in creating jobs at a time when most needed.

The 40 years of freeway gap has gone on long enough. It is time to act NOW.

Sincerely,

Donna M. Pérez

Donna M. Pérez
Superintendent

BOARD OF EDUCATION

ADELE ANDRADE-STADLER, PRESIDENT PAT RODRIGUEZ-MACKINTOSH, VICE PRESIDENT
CHESTER I. CHAU, CLERK JANE C. ANDERSON, MEMBER ROBERT L. GIN, MEMBER

"EQUAL OPPORTUNITY EMPLOYER"

City of Alhambra
Office of the Mayor and City Council

April 13, 2011

RECEIVED 4/14/11

Gateway to the San Gabriel Valley

111 South First Street Alhambra California 91801

626 570-5010

FAX 281-2248

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street, Mail Stop 16A
Los Angeles, California 90012

RE: Support for the 710N Gap Closure Project and Comments for Environmental Review.

Dear Mr. Kosinski,

This letter is being sent to you so we can be on the record on the 710N Gap Closure project. In 1933, 710 became part of the State Highway System. In 1977, CalTrans submitted a Final Environmental Impact Study in June to the FHWA recommending a four lane freeway between Routes 10 and 210.

In 1994, DKS (independent traffic consultant hired by CalTrans) completed an analysis of Low Build / Multi-ModeOption, found it dangerous, impractical, ineffective, unduly burdensome to certain communities. On April 13, 1998, the Record of Decision was signed by FHWA.

My point being, this has been studied to death, gone through an environmental process and approved. When is enough enough?

We support the tunnel alternative. It address all of our concerns, safety for our school children, congestion on local streets, decreased pollution from the stop go traffic, mobility and an overall quality of life we have been deprived of for our 25 years.

This is first and foremost a regional issue. Our freeway system currently does not operate at its maximum efficiency because of this gap. The inter-connection of the system does not exist. Our region has mandated air quality standards it has to meet. The 710 has been in 3 RTP plans and has to be included or we loose our federal funding.

PRINTED ON RECYCLED PAPER

Cost: We have an unique opportunity to fund this through a public private partnership. There will never be public funds to build this, and we cannot pass up this opportunity.

It's time to move forward on this, and the tunnel is the best alternative. It is the least disruptive and addresses everyone's concerns; you're not taking valuable real estate or cutting down trees.

Please continue the environmental process with all due speed.

Sincerely,

Barbara A. Messina

Barbara A. Messina
Councilmember

ALHAMBRA
UNIFIED SCHOOL DISTRICT

William Northrup School
409 S. Atlantic Blvd., Alhambra, CA 91801

Phone: (626) 943-6620
FAX: (626) 281-4899

April 9, 2011

RECEIVED 4/14/11

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street, Mail Stop 16 A
Los Angeles, CA 90012

Dear Mr. Kosinski,

RE: Support for the 710N Gap Closure Project and Comments for Environmental Review

This writing is being sent to you so we can be on the record on the 710N Gap Closure Project. We support a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed **NOW**.

Please include the following in the environmental analyses:

-air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved; The EIR should demonstrate both of these aspects to show actual project benefits.

-benefit of traffic reduction by schools and neighborhoods; Alhambra, El Sereno, South Pasadena, and Pasadena schools and neighborhoods are impacted by the current state of traffic due to the lack of the 710N Gap.

-this will help the safety of our students and their families daily during arrival and dismissal times as we receive a lot of traffic from Atlantic Blvd. commuters who try to avoid the already congested Fremont Blvd.

Please continue the environmental process with all due speed. Remember, we voted, along with 2/3 of all Los Angeles County voters, for Measure "R" that calls for the 710N Freeway to be completed.

We cannot wait another 40 years for this project to become a reality.

Sincerely,

Ms. Stacie Colman-Hsu
Principal, William Northrup School

René Bobadilla, P.E.
City Manager

Jesus M. Gomez
Assistant City Manager

CITY OF EL MONTE
CITY MANAGER'S OFFICE

April 14, 2011

received 4/18/11

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

RE: Support for the 710N Gap Closure Project and Comments for Environmental Review

Dear Mr. Kosinski:

I am writing to express my support for the 710N Gap Closure Project. I strongly support the construction of a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210.

Please include the following in the environmental analyses:

- The Gap has been in existence for nearly 40 years creating much confusion for drivers. The Environmental Impact Report (EIR) should show how all the freeways and major roads in the area in four directions will benefit from the closing of the gap.

- Air quality will be substantially improved in the entire basin, and existing areas suffering from adverse health impacts will be relieved. The EIR should demonstrate both of these aspects to show actual project benefits.

- Jobs will be created during these tough economic times. The EIR should detail how the project helps our economy in creating jobs and in other ways such as the benefit to the tourism industry; for example, visitors to Los Angeles will actually be able to reach their destination when using the 710N freeway instead of being routed off through local communities.

I urge you to continue the environmental process in an expeditious manner. It is important to remember that the voters of Los Angeles County voted overwhelmingly in favor of Measure "R," which calls for the 710N freeway to be completed.

We cannot wait another 40 years for this project to become a reality. Thank you for your consideration and for adding this letter to the official record.

Sincerely,

RENÉ BOBADILLA, P.E.
City Manager

11333 VALLEY BOULEVARD, EL MONTE, CALIFORNIA 91731-3293 / (626) 580-2001 / FAX (626) 453-3612
EMAIL: CityManager@ci.el-monte.ca.us WEBSITE: www.ci.el-monte.ca.us

CITY OF GLENDALE, CALIFORNIA
Office of the Mayor

613 East Broadway, Suite 200
Glendale, California 91206-4391
Tel. 818 548-4844 Fax 818 547-6740
www.ci.glendale.ca.us

April 14, 2011

received 4/14/11

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

SUBJECT: "Notice of Preparation for a Draft Environmental Impact Report/Environmental Impact Statement (EIR//EIS) for the 710 Gap Closure Project," State of California Department of Transportation, February 28, 2011

The purpose of this letter is two-fold:

1. To reiterate the position of the City of Glendale via-à-vis the SR-710 "gap closure" project. The City of Glendale remains consistent with Resolution No. 09-111 as approved by the Glendale City Council on July 28, 2009, which addresses the "gap closure" for the SR-710 freeway from I-10 to SR-134/I-210; and

2. To provide general comments concerning the subject Draft EIR/EIS.

RE: City of Glendale's Position Regarding the Proposed "Gap Closure"

The City of Glendale remains consistent with Resolution No. 09-111 as approved by the Glendale City Council on July 28, 2009, which addresses the "gap closure" for the SR-710 freeway from I-10 to SR-134/I-210, i.e., on behalf of my colleagues and the citizens of Glendale, I want to reiterate our opposition to the SR-710 "gap closure." I would like to express our opposition as well to continued effort and expenditure of tax-payer monies in exploring, studying or developing any type of "gap closure" project as we do not believe that any type of "gap closure" alternative is in the best interest of the City or the region.

We would like to express our belief and desire to instead look at other alternatives to addressing the concerns of mobility, congestion, and the movement of freight from our ports. These alternatives would include the expansion of mass transit systems, upgrades and improvements to existing infrastructure, and limiting the long-distance movement of cargo/freight from our ports to only rail.

Again, the position of the City of Glendale is clear in this matter and we remain opposed to any other gap closure alternatives.

WE RECYCLE

RE: City of Glendale's General Comments Concerning the Subject Draft EIR/EIS

1. The entire City of Glendale geographic area should be included in the Study Area.

2. All transportation scenarios and alternatives should be analyzed in the same level of depth and detail.

3. Impacts to, at minimum, traffic/transportation, air, and noise should be analyzed for the conditions of "project construction" and "upon project completion."

4. The network "links" of the computerized travel-demand model should include, at minimum, all freeways in the City of Glendale (i.e., I-5, I-210, SR-2, and SR-134) and all Major Arterials, Minor Arterials, and Urban Collectors delineated in the *City of Glendale Circulation Element of the General Plan*, August 1998.

Lastly, per your request, the City of Glendale's contact person regarding your "gap closure" project is:

Mr. Jano Baghdanian, P.E.
Traffic & Transportation Administrator
City of Glendale
Public Works Department - Traffic & Transportation Division
633 East Broadway - Room 300
Glendale, CA 91206-4384
Tele.: 818/548-3960 Option 4
Fax: 818/409-7027
Email: jbaghdanian@ci.glendale.ca.us

Thank you in advance for your consideration.

Sincerely,

Ara Najarian
Mayor

AN/JB:tc

AMIR H. SEDADI
GENERAL MANAGER

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF TRANSPORTATION
100 S. MAIN ST., 10TH FLOOR
LOS ANGELES, CA 90012
(213) 972-8470
FAX (213) 972-8410

ANTONIO R. VILLARAIGOSA
MAYOR

received 4/14/11

April 14, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main Street, MS16A
Los Angeles, CA 90012

Dear Mr. ~~Kosinski~~ Ron:

COMMENTS ON THE SCOPE OF THE ENVIRONMENTAL DOCUMENT FOR THE STATE ROUTE (SR)-710 GAP CLOSURE PROJECT

The City of Los Angeles Department of Transportation (LADOT) appreciates the opportunity to comment on the scope of the proposed Environmental Impact Report/Statement (EIR/EIS) for the SR-710 Gap Closure Project. LADOT recognizes the need for improvements of the current traffic conditions that are caused by the heavy volume of vehicles exiting at terminus of the SR-710 at Valley Boulevard. Residents of the City of Los Angeles Community of El Sereno and nearby cities have suffered from extensive traffic delays, less than desirable air quality from idling vehicles, and cut through traffic on residential streets that affect the life quality in this area.

We would like the EIR/EIS process to address all feasible alternatives for this project including but not limited to surface street and subsurface multimodal improvements along with the corresponding comprehensive studies of their impacts in the local and regional contexts. Transportation demand modeling should be done at the macro and micro level to yield a better understanding of the benefits, impacts and mitigations to the freeway and arterial network as well as adjacent neighborhood streets. In this difficult economic climate and with the expectation that transportation funds will continue to be scarce for years to come, consideration should be given to a toll-way operation for any studied freeway alternative.

As a 4.5 mile tunnel will likely be one of the alternatives proposed in the EIR/EIS to close the gap in the SR-710 between Valley Boulevard to the south and Del Mar Boulevard to the north, the official position of the City of Los Angeles, as approved by the City Council and Mayor in December 2009, is to oppose the extension of the SR-710 through Zones 1 and 2 as defined by Caltrans in the SR-710 Tunnel Feasibility

Technical Assessment. Furthermore, the City Council and Mayor oppose the extension of the SR-710 unless the Community of El Sereno is protected by specifying that the tunnel portal must begin and end south of Valley Boulevard.

We hope to see detailed air quality studies performed to understand and mitigate any potential impacts by pollutants in the vicinity of the ventilation stacks that will be necessary for a lengthy tunnel. The environmental document should also address the emergency access requirements for a tunnel and the resulting impacts and mitigations. The City is also concerned about construction impacts (traffic closures, noise, vibration, emergency response and other impacted public services) to the Community of El Sereno since the construction of this tunnel could take several years. The effects of detouring traffic during construction and how it will affect the community should also be part of the traffic study performed under the EIR/EIS.

LADOT looks forward to working cooperatively with Caltrans, Metro and other affected agencies to develop and evaluate the best alternatives for this important project. Should you have any questions, please contact me at (213) 972-5008 or Larisa Bolotsky of my staff at (213) 972-5024.

Sincerely,

Ken A. Husting, P.E.
Acting Principal Transportation Engineer
Bureau of Capital Programming

c: John Brady, Office of the Mayor
Paul Habib, Fourteenth Council District
Jim Doty, Bureau of Engineering

MAYOR:
GARY TAYLOR

MAYOR PRO TEM:
STEVEN LY

COUNCIL MEMBERS:
SANDRA ARMENTA
MARGARET CLARK
POLLY LOW

City of Rosemead

8838 E. VALLEY BOULEVARD • P.O. BOX 399
ROSEMEAD, CALIFORNIA 91770
TELEPHONE (626) 569-2100
FAX (626) 307-9218

received
4/14/11

April 7, 2011

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

RE: Support for the 710N Gap Closure Project and Comments for Environmental Review

On behalf of the Rosemead City Council, I would like to express our support for the 710N Gap Closure Project. We are in support of a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative that this connection be completed immediately.

We highly recommend that information that supports the facts below be included in the environmental analysis:

- The gap has been in existence for nearly 40 years, which has created and continues to create confusion and dangerous conditions for drivers. The EIR should explain that by closing the gap, all freeways and major roads in the area would benefit.
- Air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved. The EIR should demonstrate both of these aspects to show actual project benefits.
- Jobs would be created during these tough economic times. The EIR should details how the project would help our economy in creating jobs and also benefit the tourism industry. For example, visitors would be able to reach their destination when using the 710N freeway instead of being routed off through local neighborhoods.

We encourage you to continue the environmental process with all due speed. As a reminder, when we voted for Measure "R", along with 2/3 of all Los Angeles County voters, the measure called for the completion of the 710N freeway. The

San Gabriel Valley Council of Governments also continues to be a major supporter of the 710N freeway extension.

We can't afford to wait another 40 years for this project to become a reality.

Sincerely,

Steven Ly
Mayor

City of San Marino

Office of the City Manager

received
4/14/11

April 12, 2011

MATTHEW C. BALLANTYNE
City Manager

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

RE: Support for the 710N Gap Closure Project and Comments for Environmental Review

Dear Mr. Kosinski,

We are writing to express our support for the 710N Gap Closure Project and would appreciate it if you made this letter part of the official record. We strongly support the construction of a tunnel or a surface route extension, connecting (void of any additional off-ramps) the 710N to the statewide freeway system at Interstate 210.

As you are aware, the Interstate 710 Freeway serves as a major north-south link in the Los Angeles County transportation network and over the past forty (40) years, alternatives have been proposed and evaluated to complete the 710 freeway and close the 4.5 mile gap in the corridor.

In addition, the California Department of Transportation (Caltrans), Federal Highway Administration (FHWA), the Southern California Association of Governments (SCAG), Los Angeles Metropolitan Transit Authority (MTA), the San Gabriel Valley Council of Governments (SGVCOG), support the completion of the 710 freeway to relieve regional and local traffic congestion and enhance air quality. It is imperative this connection be completed.

Please include the following in the environmental analyses:

- The EIR should show how all the freeways and major roads in the area in four directions will benefit from the closing of the gap.
- Air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved. Therefore, the EIR should demonstrate both of these aspects to show actual project benefits.
- Jobs will be created during these tough economic times. As a result, the EIR should detail how the project helps our economy in creating jobs

2200 Huntington Drive, San Marino, CA 91108-2639 • Phone: (626) 300-0700 Fax: (626) 300-0709
Email: mballantyne@cityofsanmarino.org

We urge you to continue the environmental process in an expeditious manner. It is important to remember that the voters of Los Angeles County voted overwhelmingly in favor of Measure "R," which calls for the 710N freeway to be completed. Thank you for your consideration and for adding this letter to the official record.

Sincerely,

Matt Ballantyne
City Manager

Cc: Mayor Allan Yung, MD and City Council
Assembly Member Mike Eng

RECEIVED 4/14/11

FREMONT SCHOOL *Home of the Chargers*

Maria E. Sanchez, Principal *2001 South Elm Street, Alhambra, California 91803* **Phone: 626-308-2341**

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street Mail Stop 16A
Los Angeles, CA 90012

April 8, 2011

Re: Support for the 710N Gap Closure Project and Comments for Environmental Review

Dear Mr. Kosinski,

This letter is being sent to you so we can be on the record on the 710N Gap Closure project. Fremont school staff and community supports a tunnel or a surface route extension connecting the 710N on the statewide freeway system at Interstate 210. It is imperative this connection be completed NOW.

For the past ten years I've seen an increase in the number of students with respiratory problems. We currently have 49 students that have been physician diagnosed with respiratory/pulmonary disorders; twelve of those students have to take medication (inhalers) at school. Another seven percent of my student body complains of allergic disorders.

Our school is located next to the 10 Interstate Freeway. Researchers at UCLA have found that a large freeway's pollution plume extends as much as a mile and a half from the roadway–in this case, I-10. "This distance is 10 times greater than previously measured daytime pollutant impacts from roadways and has significant exposure implications."

Key studies on air pollution and health effects near high traffic areas have shown that proximity to freeways or busy roads is linked to shorter life spans for nearby residents. A study in New York found that children living in neighborhoods with heavy traffic within 200 meters of their homes had increased risks of asthma hospitalization. In Los Angeles, researchers have observed an approximately 10-20% increase in the risk of premature birth and low birth weight for infants to women living near high traffic areas in LA County. Another study published by American Journal Respiratory and Critical Care Medicine, found that two year old children who are exposed to higher levels of traffic-related air pollution are more likely to have self-reported respiratory illnesses, including wheezing, ear/nose/throat infections, and reporting of physician-diagnosed asthma, flu or serious cold.

A Denver study showed that children living within 250 yards of streets or highways with 20,000 vehicles per day are six times more likely to develop all types of cancer and eight times more likely to get leukemia. The most comprehensive study of urban toxic air pollution ever undertaken was conducted by the South Coast AQMD, shows that motor vehicles and other mobile sources of air pollution are the predominant source of cancer-causing air pollutants in Southern California.

My school community can no longer wait; we need to fix this now. As a result, the air quality will be substantially improved in the entire basin and the adverse health impacts will be relieved.

Please continue the environmental process with all due speed. Remember we voted, along with 2/3 of all Los Angeles County voters, for Measure "R" that calls for the 710N freeway to be completed.

Fremont school children cannot wait another 40 years for this project to become a reality. Fremont's children are depending on you.

Sincerely,

Maria E. Sánchez

Maria Elena Sánchez
Principal

CITY COUNCIL

David A. Spence, Mayor
Stephen A. Del Guercio, Mayor Pro Tem
Michael T. Davitt
Laura Olhasso
Donald R. Voss

April 14, 2011

VIA PERSONAL DELIVERY

RECEIVED 4/14/11

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Re: City of La Cañada Flintridge's Comments on Notice of Preparation and Scope of Environmental Impact Report/Environmental Impact Statement PM 26.7/32; State Clearinghouse No. 1982092310 - 710 Gap Closure

Dear Mr. Kosinski:

Thank you for the opportunity to comment on the Notice of Preparation and scope of the proposed Environmental Impact Report ("EIR") and Environmental Impact Statement ("EIS") ("EIR/EIS") for the 710 Gap Closure Project ("710 Project"). The City of La Cañada Flintridge ("City") incorporates by reference all oral testimony and written comments submitted by City representatives at the Steering and Technical Advisory Committee meetings for the SR-710 Tunnel Geotechnical Study. We reserve the right to submit further comments and objections.

I. INTRODUCTION.

The City believes that whatever mobility and traffic congestion challenges may exist within the 710 corridor, they can be more effectively achieved with a smart combination of other local artery traffic management systems, transit, and light and/or heavy rail improvements than with the recently studied tunnel option.

Caltrans and the people of Los Angeles have previously chosen a multi-modal option over the construction of a freeway facility with unacceptable impacts. In the 1980s, S.R. 2 was abandoned because there was a community consensus its construction through Echo Park and Silver Lake would impose too many impacts. For similar reasons, the use of Measure R funds to conduct an EIR/EIS and to construct a 710 freeway, tunnel or freeway/tunnel option is a waste of regional

transportation dollars that could and should be directed to more cost-effective unfunded transportation projects. Even preliminary studies of possible tolls to be charged to obtain bond financing for the 710 Project suggest that such tolls would divert so much traffic away from the completed facility as to make it economically infeasible.

Nevertheless, Caltrans has released a Notice of Preparation ("NOP") and the Federal Highway Administration has issued a Notice of Intent ("NOI") of an EIR/EIS for the 710 Project under the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"), respectively, and the cities of the western San Gabriel Valley and Crescenta Valley are threatened with significant environmental impacts from such a project or set of project(s).

As a preliminary matter, any EIR/EIS must include all areas in which the proposed project will cause direct or indirect effects on the environment. The map of the project study area attached to the NOP excludes the City.

Under Options 1, 2 and 3 of the former 710 Tunnel Feasibility Study and, before that, the 1992 EIR for the surface freeway option adopted by the Federal Highway Administration in 1998, it was found that significant traffic, noise, and air quality impacts would be suffered by the City's residents. Now, Caltrans has improperly excluded the City from the EIR/EIS project study area even though it knows that significant impacts to persons and sensitive receptors in the City will likely occur as a result of construction and operation of the 710 Project.

Subsequent to the issuance of the NOP and NOI, Caltrans conducted an EIR/EIS scoping meeting in the City on April 5, 2011, apparently conceding that the residents of La Cañada Flintridge will be subject to potentially significant negative impacts of the 710 Project. Accordingly, the EIR/EIS project study area must be expanded to specifically analyze all potential significant impacts within the City. Because impacts do not arbitrarily end at a municipal boundary, the study area should be further expanded to include the surrounding communities along the I-210 corridor in the Crescenta Valley. Accordingly, the NOP must be reissued to show an expanded study area for all areas impacted by the potential 710 project(s).

Those impacts will be significant and permanent for residents of the City depending upon what the preferred project alternative might be. Some of the tunnel options and the original surface freeway connection will increase traffic congestion and vehicle miles traveled through the City on the I-210 freeway and adjacent street arteries.

Previous studies have established that a 710 Freeway connection to the I-210 will significantly increase diesel and other truck traffic through the City. As a result, the school children of public and private schools, especially those within or near the 500-foot state-mandated buffer zone to the I-210 Freeway, will suffer from degraded air quality, exposure to cancer and asthma from diesel and road particulate matter, increased noise, and increased traffic safety issues on adjoining streets such as Foothill Boulevard.

Throughout the previous public hearings and input processes at both the Los Angeles County Metropolitan Transportation Authority ("Metro") and Caltrans, officials representing those agencies made specific assurances on the record that the City's concerns about impacts would be fully studied "in the EIR process." It is disappointing that after all of these public assurances by officials of Metro and Caltrans that the City currently is not shown within the area for study. For all of these reasons, the City of La Cañada Flintridge demands that the study area be expanded to include the City and surrounding communities, with a comprehensive examination of all potential impacts as outlined herein.

Finally, of particular significance to the safety of users of any project option that includes use of tunnel technology, the EIR/EIS must disclose and mitigate the potential impacts of catastrophic earthquake damage because Caltrans chooses to construct the facility across active fault lines. The EIR/EIS must demonstrate that the tunnel can survive an earthquake along all of the known and unknown fault lines the tunnel crosses, and that users in the tunnel will be safe in the event of a major seismic event. The EIR/EIS must also provide cost estimates for the additional safety measures needed to withstand such a major seismic event. Additionally, any impact the construction of the project might have on the earthquake faults and potential resulting seismic issues should be studied.

II. THE NOTICE OF PREPARATION IS DEFICIENT.

CEQA Guidelines Section 15082(a)(1) provides that:

> "The notice of preparation shall provide the responsible and trustee agencies and the Office of Planning and Research **with sufficient information describing the project** and **the potential environmental effects to enable the responsible agencies to make a meaningful response**. At a minimum, the information shall include:
>
> (A) Description of the project.

(B) Location of the project (either by street address and cross street, for a project in an urbanized area, or by attaching a specific map, preferably a copy of a U.S.G.S. 15' or 7-1/2' topographical map identified by quadrangle name), and

(C) Probable environmental effects of the project." (Emphasis added.)

The project description in the NOP states that:

> "The proposed project, depending on the results of a thorough environmental analysis of all possible transportation improvements during the NEPA/CEQA process, may include, but not be limited to: surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems, local street upgrades, traffic management systems and a no build alternative."

The project location in the NOP states that:

> "Depending on the alternative selected, this project would be located in the study area bordered by Interstate 10 to the south, Interstate 605 to the east, Interstate 210 to the north, and State Route 2 to the west, in Los Angeles County, California."

The stated project objective is "to relieve congestion and improve mobility within the study area." Presumably, the area listed above as the "project location" is the study area.

The project description is inadequate because it is so general as to be meaningless. The CEQA Guideline requires that <u>at a minimum</u> the project proposed to be undertaken must be described so that the responsible and trustee agencies and the public may be able to intelligently comment upon what possible environmental issues should be examined in the EIR/EIS. "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." <u>County of Inyo v. City of Los Angeles</u> (1977) 71 Cal.App.3d 185, 192-93. Such a defined project description necessarily starts with the NOP which requires, at a minimum, a proper "[d]escription of the project." CEQA Guidelines § 15082(a).

The inadequacy of this extremely broad project description is exacerbated by the equally obtuse identification of the project "location" as being most of the western San Gabriel Valley and Northeast portions of the City of Los Angeles.[1] Caltrans' failure to identify a specific project description and show its specific location(s) on a map severely compromises the ability of agencies and the public to comment on the proposed project. Responsible and trustee agencies will be impaired in their ability to meaningfully comment as to whether the project will affect their jurisdiction because of the failure to provide "sufficient information describing the project" and "potential environmental effects" of the project, as mandated under CEQA.

The failure to prepare or at least distribute any initial study of the particular project that will be proposed in the upcoming Draft EIR signals that Caltrans may be pursuing an improper strategy of withholding from public knowledge the preferred project alternative until the Draft EIR is issued. This violates CEQA's requirement that when the NOP is issued, the Lead Agency must inform the responsible and trustee agencies, as well as the public, what specifically the project is and where it will be located.

The CEQA process of consultation and public comment is intended to assist the Lead Agency and responsible and trustee agencies to make an informed choice about discretionary decisions to implement a project. None of this can occur when the Lead Agency fails to identify a specific project description and location.

Only by providing a specific project description and location can Caltrans fulfill the third minimum requirement of CEQA Guidelines Section 15082(a), i.e., setting forth the "[p]robable environmental effects of the project." Curiously, Caltrans set forth the "Impacts" as follows:

> "Various environmental and community resources are known to exist within the limits of the study area. These resources include, but are not limited to: geotechnical, erosion, hydrology, air quality, water quality, noise, biology, public utilities, vehicle traffic patterns, parking, land use planning and hazardous waste. Displacement of homes and businesses is a significant issue. Soundwalls, relocation assistance, construction impact management and other mitigation measures will be

---

1 The Initial Study Area map that apparently accompanied the NOP magnifies the problem of an overly vague project description by misidentifying S.R. 134 between I-210 and S.R. 2 in Pasadena and Glendale as I-210.

incorporated into the proposed project."

The NOP provides a laundry list of environmental issues, but except for displacement of homes and businesses, fails to identify any environmental effects of the proposed project. Because the NOP fails to attach any initial study or alternative narrative that might help the responsible and trustee agencies and public identify the probable environmental effects, the "impacts" listed are inadequate to enable informed public participation in the scoping process. There may be displacement of homes and businesses, but until Caltrans identifies in a proper NOP the type of project(s) preferred and their location(s), no intelligent scoping comments may be prepared by responsible and trustee agencies or members of the public.

In addition to failing to meet its responsibilities for an NOP under CEQA, the NOI also fails to meet minimum requirements under NEPA. Council on Environmental Quality Regulation Section 1501.7 provides:

> "There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues **related to a proposed action**. This process shall be termed scoping." (Emphasis added.)

Until Caltrans issues a NOI that describes a "proposed action," the scoping process for the federal law and implementing regulations will be inadequate.

For all of these reasons, the NOP/NOI is deficient and must be reissued, preferably with a completed initial study for the particular project Caltrans intends to propose when the Draft EIR/EIS is released.

III. THE FAILURE TO INCLUDE LA CAÑADA FLINTRIDGE IN THE AREA OF STUDY IS IMPROPER.

As outlined above, the map of the "project location" appears to also be the project "study area." Caltrans is preparing an EIR/EIS for the 710 Project because it is a regionally significant project.

CEQA Guidelines Section 15125 provides that:

> "(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published

> . . . **from both a local and regional perspective**."
> * * *
>
> (c) Knowledge of the regional setting is critical to the assessment of environmental impacts." (Emphasis added.)

The Council on Environmental Quality Regulation Section 1502.15 states:

> "The environmental impact statement shall succinctly describe the environment of the **area(s) to be affected** or created by the alternatives under consideration." (Emphasis added.)

The effects of a project or projects to address the issues associated with the so-called "710 Gap Closure Project" will be regional and most certainly not restricted to the boundaries of the "project location" or project "study area" attached to the NOP. The reach of the impacts into the Crescenta Valley is clear from **Exhibit 1** to this correspondence, an analysis by the City's Traffic Engineer of the SCAG "SR-710 Missing Link Truck Study (Preliminary Draft Final Report)," prepared in 2009. Both CEQA and NEPA impose a mandatory duty on Caltrans to investigate, report, and mitigate the significant direct and indirect impacts of the project in the affected areas of the project's environmental setting.

Since issuance of the NOP, Caltrans has acknowledged the potential significant environmental impacts on La Cañada Flintridge. It has done so by scheduling and holding an additional scoping meeting within the City on April 5, 2011. At this meeting, Caltrans received additional public scoping comments about the "710 Gap Closure Project" and its significant, adverse impacts on the residents of La Cañada Flintridge. Caltrans should re-issue the NOP, identifying a specific project, location, and the potential significant impacts. In the re-issued NOP, the project should be located on a regional and local map and the entire study area for the EIR should be shown on a separate map to confirm to the public that all direct and indirect regional project impacts will be analyzed in the EIR/EIS.

For the foregoing reasons, Caltrans must include specific EIR/EIS analysis of project impacts and mitigation measures for the City of La Cañada Flintridge.

IV. THE PROJECT OBJECTIVES MUST NOT RESTRICT THE SCOPE OF ANALYSIS.

CEQA Guidelines Section 15124 provides:

> "The description of the project shall contain the following information . . . (b) A statement of objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project."

The Council on Environmental Quality Regulation Section 1502.13 provides:

> "The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action."

The NOP states:

> "There currently is a gap in the I-710 corridor, for a distance of approximately 4.5 miles (7.2 km), which extends between Valley Boulevard to the south and Del Mar Boulevard to the north. As originally identified in the April 13, 1998 Record of Decision for the Meridian Variation alignment, this gap contributes to congestion on local streets and the regional freeway system. The objective of this project is to relieve congestion and improve mobility within the study area."

This statement in the NOP is not the statement of objectives required by CEQA, although it does appear to articulate the underlying purpose and claimed need to which the agency is responding.

The City is concerned that in preparing the Draft EIR, Caltrans will craft a set of project objectives so narrow that only the preferred alternative will fulfill the project objectives. Writing the project objectives in a manner to bolster a lead agency claim that only the preferred project alternative can fulfill the project objectives is an example of how the CEQA EIR process is frequently manipulated.

The project objective should be as stated in the NOP: to "relieve congestion and improve mobility." With that objective, all multi-modal projects remain available in the Caltrans toolbox to achieve the objective of relieving congestion and improving mobility.

V. A COST-BENEFIT ANALYSIS OF PROJECT OPTIONS THAT INCLUDE A HIGHWAY OR TUNNEL MUST BE CONDUCTED EARLY IN THE NEPA/CEQA PROCESS TO INFORM DECISION MAKING.

Given the magnitude of the estimated cost of the full environmental review of the 710 Project and the estimated construction cost of highway and/or tunnel options, Caltrans must perform a credible initial cost-benefit analysis before commencing the most costly environmental studies, and then, as the environmental review process concludes, update the cost-benefit studies to include all estimated project costs including mitigation of the impacts identified in the environmental review process.

Federal regulations contemplate the inclusion of a cost-benefit analysis as follows:

> "If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by referenced or appended to the statement as an aid in evaluating the environmental consequences." (Council on Environmental Quality Regulation Section 1502.23.)

The two-step cost-benefit analysis suggested by the City is a practical consideration of how cost-benefit analysis would guide Caltrans in decision-making about the selected alternative(s). If initial cost-benefit analysis shows that highway or tunnel options are cost prohibitive, then the other multi-modal options should be intensively studied rather than proceeding to prepare environmental review of highway and/tunnel options. The second cost-benefit analysis conducted near the end of the NEPA/CEQA process would be a final reality check if the initial cost-benefit study for highway and/or tunnel seemed reasonable but inclusion of all refined project and mitigation costs make highway and/or tunnel options beyond financial reach.

Included in any cost-benefit analysis must be refined analysis of what the impact on toll revenues would be at various price levels. As shown in the preliminary toll analysis performed for the Route 710 Tunnel Feasibility Assessment

Report at page 10-130 (attached at **Exhibit 2**), as the toll rises, the greater is the diversion of cars and trucks from the facility. There comes a point where the required tolls signal that a highway or tunnel facility would indeed be infeasible. A two-tiered cost-benefit study would help Caltrans make informed decisions and potentially avoid costly waste of funds for full environmental review of a project that ultimately proves to be economically infeasible.

Finally, any cost-benefit analysis must include feasibility analysis of the public-private partnership ("P3") funding model contemplated for a tunnel project. This is especially true because the funding model for Caltrans projects using federal transportation funds was questioned by the Legislative Analyst's Office in a March 2, 2010 report to the Legislature. (See "2010-11 Budget: Transportation, Legislative Analyst's Office, March 2, 2010" at pp. 21-23. found at: http://www.lao.ca.gov/analysis/2010/transportation/trans_anl10.pdf.)

It would be fiscally irresponsible to commence full EIR/EIS review without first verifying that the P3 funding mechanism is legal, institutionally appropriate, and financially viable to pay a share of the cost of the 710 Project. This critical first step must be completed before conducting full EIR/EIS review to assure that such high environmental planning costs are not wasted on a project that ends up being infeasible. The City's recommended cost-benefit study process is a vital cost containment strategy for the 710 Project.

VI. GIVEN THAT THE PROJECT "MAY" BE A TUNNEL, FREEWAY, HEAVY RAIL, LIGHT RAIL, BUS TRANSIT, OR TRAFFIC MANAGEMENT SYSTEM, OR A COMBINATION OF THESE MODES, ALL OF THESE ALTERNATIVE PROJECTS MUST BE ANALYZED IN FULL DETAIL.

In the normal case, a lead agency would release an NOP that describes a specific project, location, and the potential significant environmental impacts of the proposed project. Caltrans has failed to release such an NOP, choosing instead to release an extremely broad project and location description and leaving open until the Draft EIR stage a determination of what the proposed project will be.

In the normal case, the preferred project alternative is analyzed in the greatest detail, and the range of project alternatives, including the no project option, are analyzed with less detail. A matrix is used to compare the preferred project alternative to the advantages and disadvantages of the project alternatives.

Here, Caltrans' refusal to initially identify a preferred project alternative requires that the Draft EIR analyze each and every transportation mode listed in the NOP to the same level of detail. CEQA Guidelines Section 15126.6 provides:

> "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and **comparison with the proposed project**. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison." (Emphasis added.)

Under the NOP, each transportation mode option is listed as a potential project for the 710 gap closure. Because no particular project is selected as "the proposed project," each of the possible project alternatives must be analyzed in full detail as if they were the preferred project. In making the comparison of project alternatives, each alternative identified by Caltrans would stand on equal footing in the comparison process. In other words, each option must be analyzed at the same level of detail and each compared to the other alternatives in order to help decision makers and the public determine the best course of action, including the no project option.

Federal requirements require rigorous investigation and objective evaluation of all project alternatives. Council on Environmental Quality Regulation Section 1502.14 states:

> "Alternatives including the proposed action. **This section is the heart of the environmental impact statement.** Based on information and analysis presented in the sections on the Affected Environment (Section 1502.15) and the Environmental Consequences (Section 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. In this section agencies shall:
>
> (a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.
>
> (b) Devote substantial treatment to each alternative considering in detail including the proposed action so that reviewers may evaluate their comparative merits.

(c) Include reasonable alternatives not within the jurisdiction of the lead agency.

(d) Include the alternative of no action.

(e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.

(f) Include appropriate mitigation measures not already included in the proposed action or alternatives." (Emphasis added.)

Although the federal and state structures are similar, it is clear that to meet the mandatory disclosure obligations under federal and state law, Caltrans must undertake a detailed examination of all transportation modal project alternatives considered and provide a meaningful comparison to enable an informed selection of the preferred project or projects to meet the project objective.

VII. THE EIR/EIS MUST DISCLOSE AND ANALYZE ALL CONSTRUCTION-RELATED IMPACTS OF A 710 TUNNEL OPTION.

The deficiencies in the NOP/NOI have impaired the ability of the City to fully participate in the scoping process with respect to operational impacts of a tunnel option. This impairment also extends to the scoping process regarding construction-related elements of a tunnel option and impacts resulting from that construction. Nevertheless, those elements and impacts must be identified and analyzed in the EIR/EIS. For a tunnel option, this includes not just the amount of earth that must be moved, but the likely haul route(s) and the location(s) where the earth and debris will be deposited. The traffic and emissions related to the hauling must also be disclosed and analyzed. Further, given the potential for tunnel construction at the same time as debris basin clearance throughout the foothill communities of the San Gabriel and Crescenta Valleys, the cumulative impacts of debris hauling from a tunnel project must also be disclosed and analyzed.

VIII. THE EIR/EIS MUST ADDRESS ALL POTENTIAL SIGNIFICANT ENVIRONMENTAL IMPACTS AFFECTING LA CAÑADA FLINTRIDGE AND OTHER SURROUNDING AREAS.

While Caltrans has issued a facially invalid NOP, if Caltrans decides to proceed to prepare an EIR/EIS without re-circulating a revised NOP, a proper EIR/EIS must still be prepared.

In order to properly assess the potential direct and indirect effects on the City, the EIR/EIS must evaluate all of the traffic, air quality, and noise effects previously raised by the City to the Los Angeles County Metropolitan Transportation Authority ("Metro") and/or Caltrans, and all new information included herein.

A. All Issues Raised in the City's 2006 and 2009 Letters Must Be Investigated And Mitigated.

Attached hereto at **Exhibit 3** is a copy of the City's October 12, 2006 objection letter ("2006 Letter") to Metro's proposal to prepare a Route 710 Tunnel Technical Feasibility Assessment Report, along with the four supporting exhibits. Attached hereto at **Exhibit 4** are copies of the City's July 15, 2009 letter to Caltrans regarding Task Order #5 and an undated letter sent to Mike Jones at the Southern California Association of Governments in 2009 ("2009 Letters). In the 2006 Letter and 2009 Letters, the City provided evidence that the increase in traffic, particularly truck traffic, through the City on I-210 would greatly exacerbate traffic congestion, noise, air pollution and health risks within the freeway corridor.

B. All Issues Raised in the City Traffic Engineer's April 2011 Memorandum Must Be Investigated And Mitigated.

Attached hereto at **Exhibit 5** and incorporated herein by reference is a copy the City Traffic Engineer's April 7, 2011 Memorandum analyzing potential traffic impacts and related matters that must be included in a comprehensive EIR/EIS for the710 Project.

Of particular concern to the City is the critical need of the EIR/EIS to study the health risk assessment of schools, parks, hospitals, and homes within at least 1,000 feet of the I-210 corridor. The City has provided a color copy of the map of public and private schools in Exhibit 3 to the October 12, 2006 letter to Metro which is itself attached hereto at **Exhibit 3**.

Additionally, the City Traffic Engineer's memorandum identifies those areas of inquiry that must be given priority and "first study" by Caltrans in order to better

inform the NEPA/CEQA study process at it progresses.

C. All Issues Raised by the 2004, 2007 and 2010 Studies Of Impacts Of Air Pollution Near Freeways Must Be Investigated And Mitigated.

Attached collectively hereto at **Exhibit 6** are copies of: the September 9, 2004 New England Journal of Medicine study of the Effect of Air Pollution on Lung Development from 10 to 18 Years of Age; announcement of the February 17, 2007 Keck School of Medicine of the University of Southern California study finding that children living within 500 meters of a freeway since age 10 had substantial deficits in lung function by the age of 18 years compared to children living further away; announcement of the December 16, 2010 Children's Hospital Los Angeles study establishing a link between proximity to a freeway and autism; and a copy of the March 6, 2010 Los Angeles Weekly article "Black Lung Lofts – Many children being raised in LA's hip, new freeway adjacent housing are damaged for life."

In the 2006 Letter at page 4, the City noted in particular that USC School of Medicine researchers who reviewed the 2006 710 Tunnel Feasibility Report were extremely concerned that the Report "focused only on increases in regulated pollutants exceeding the regulatory standard." The USC researchers criticized this approach as masking the full impact of air pollution on adjoining sensitive receptors – particularly children. The USC approach is supported in case law:

> "Agency 'thresholds of significance' are not the only thresholds that may be used in determining the existence of a 'significant' impact. A significant impact may occur even if the particular impact does not trigger or exceed an agency's arbitrarily set threshold of significance." Communities for a Better Environment v. California Resources Agency (2002) 103 Cal.App.4th 98, 114.

Based up a growing and robust body of research readily available to Caltrans, the determination of the proper thresholds of significance should require Caltrans to consult with the researchers at USC to help determine whether current air quality thresholds of significance are adequate to assure that proximity to a freeway with the anticipated traffic increases caused by the likely preferred project alternative will not have damaging effects on the health of sensitive receptors – especially children living or attending school within 500 feet of a freeway. To set the threshold of significance above what current research establishes as deleterious to lung and brain function would make the EIR/EIS legally deficient in assessing the true health impacts of air pollution from freeway adjacency.

D. All Issues Raised By The Residents Of La Cañada Flintridge At The April 5, 2011 Scoping Meeting Must Be Investigated And Mitigated.

At the April 5, 2011 scoping meeting, residents of La Cañada Flintridge and other communities throughout the Crescenta Valley spoke forcefully about issues that must be addressed in the preparation of the EIR/EIS, most of them focused on a tunnel option. More than 30 people spoke at the hearing to raise their nearly uniform opposition to the environmental impacts that would be imposed on the City's residents by the construction and operation of the 710 Project. Our understanding is that a court reporter was present at the scoping meeting. We request that a transcript of the scoping meeting be prepared and entered into the record.

Even though we trust that a complete transcript will be entered into the record, it is important to note here certain recurring themes addressed by residents of the City and the surrounding communities. Some comments focused on the proper approach to the EIR/EIS process and other comments focused on particular matters that need to be disclosed and analyzed in the EIR/EIS.

First, at least one person noted that before Caltrans embarks on a $60 to $80 million EIR/EIS study process, there is a critical need for credible cost estimates of the modal options and a cost benefit analysis. Such an analysis is required because the estimated cost of the planning process would itself pay for significant transportation construction work if it were not being spent on the 710 Project.

Second, other speakers pointed out that the study area must include not just the City, but surrounding communities in the Crescenta Valley along the I-210 corridor that include La Crescenta, North Glendale and Sunland/Tujunga.

Third, many speakers pointed out that the majority of the City's schools – from pre-school to high school and both public and private – are within or adjacent to a 500-foot zone from I-210. The health impacts to children from increased traffic, especially commercial truck traffic, must be disclosed and analyzed. These impacts will arise not only from degraded air quality, but increased noise, as well.

In addition to the global study issues, residents raised a number of other matters that must be disclosed and analyzed in the EIR/EIS. Public safety issues were raised by several speakers, both in terms of resources needed to operate a tunnel project and the potential impacts of accidents and other man-made disasters in a tunnel. One speaker pointed out that trucks would need to be inspected before entering the tunnel in order to prevent certain hazardous or dangerous materials from being transported through the tunnel. This not only has an impact on public safety resources that must be disclosed and analyzed, but inspections also have impacts on

traffic that must be disclosed and analyzed.

Speakers raised the real specter of man-made disasters in the tunnel, both intentional and accidental, including the unfortunate but obvious potential for a tunnel to be a terrorist target. Others pointed out examples of fatal and horrific tunnel fires stemming from accidents in the I-5 Newhall Pass Interchange in 2007 and in the Mt. Blanc tunnel connecting France and Italy in 1999. The possibility of accidents in the tunnel, and the impacts to public safety and public safety resources, must be fully disclosed and analyzed.

The need to analyze growth-inducing impacts of a tunnel was also identified at the April 5, 2011 meeting. This involves not just growth-inducing impacts in the Crescenta Valley, but related to the ports of Long Beach and Los Angeles given that the Project would ostensibly facilitate increased movement of container traffic inland from the ports.

Speakers identified traffic study variables that will need to be accounted for, in addition to the delays caused by the need for inspections that have already been identified. These include multiple toll scenarios. Analyzing traffic impacts based on a single price point for a given class of vehicle will not provide decision makers with sufficient information upon which to make an informed decision. As the 2006 "Route 710 Tunnel Technical Feasibility Assessment Report," prepared for Metro by Parsons Brinckerhoff acknowledged, different toll scenarios will have significantly different impacts on traffic diversion rates. As anticipated toll revenue may also have an impact on overall project cost, a cost study must also be an important first component of the environmental review.

Driver behavior must also be accounted for. Among others, a view was expressed that private passenger vehicle drivers will be reluctant to use a long tunnel, further concentrating commercial truck traffic in the tunnel.

IX. CONCLUSION.

Thank you for your consideration of these preliminary comments and objections. Please ensure that we are provided with advanced written notice of any and all meetings, hearings, actions and votes related to this matter. Please contact us with any questions or comments.

Sincerely,

LA CAÑADA FLINTRIDGE CITY COUNCIL

David A. Spence

David A. Spence, Mayor

cc: The Honorable Stephen A. Del Guercio, Mayor Pro Tem
The Honorable Laura Olhasso, Councilmember
The Honorable Donald R. Voss, Councilmember
The Honorable Michael T. Davitt, Councilmember
Mark R. Alexander, City Manager
Mark W. Steres, City Attorney
The Honorable Congressman David Dreier
The Honorable Congressman Adam Schiff
The Honorable Senator Carol Liu
The Honorable Assemblymember Anthony Portantino
The Honorable Supervisor Michael D. Antonovich
The Honorable Mayor, City Councilmembers and the City Manager, City of Glendale
The Honorable Mayor, City Councilmembers and the City Manager, City of Burbank
The Honorable Mayor, City Councilmembers and the City Manager, City of Pasadena
The Honorable Mayor, City Councilmembers and the City Manager, City of South Pasadena
Altadena Town Council
La Crescenta Town Council

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COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

June 16, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, Ms 16a
Los Angeles, CA 90012

Dear Mr. Kosinski:

DRAFT ENVIRONMENTAL IMPACT REPORT, NOTICE OF PREPARATION FOR A DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT (EIR/EIS) FOR THE 710 GAP CLOSURE PROJECT, VALLEY BLVD. TO THE SOUTH AND DEL MAR BLVD. TO THE NORTH, ALHAMBRA (FFER #201100034)

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. This project is located outside the jurisdiction of the Los Angeles County Fire Department and it appears it would not have any impact on the emergency responsibilities of this Department.

LAND DEVELOPMENT UNIT:

1. This project is located outside the jurisdictional area of the County of Los Angeles Fire Department. This project will have no impacts that would necessitate any comments from the County of Los Angeles Fire Department, Land Development Unit.

2. The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project. Should any questions arise, please contact the County of Los Angeles Fire Department, Land Development Unit's Inspector, Juan Padilla, at (323) 890-4243 or at **Juan.padilla@fire.lacounty.gov**

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Environmental Impact Report.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed project.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:lj

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN
Chief Engineer and General Manager

March 8, 2011

File No: 16-00.04-00

Mr. Ron Kosinski, Deputy District Director RK
Department of Transportation
100 South Main Street, MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

The 710 Gap Closure Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on March 2, 2011. We offer the following comments regarding sewerage service:

1. The majority of the proposed development is located within the jurisdictional boundaries of District No. 16. However, the remaining portions of the project area are located outside the sphere of influence of the Districts, as adopted by the Local Agency Formation Commission (LAFCO). Wastewater generated by these portions of the proposed project will be treated by the City of Los Angeles Hyperion Treatment System. Questions regarding sewerage service for the proposed project should also be directed to the City of Los Angeles' Department of Public Works.

2. The proposed project may impact existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specifications that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Ms. Martha Tremblay of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

Adriana Raza

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar
c: M. Tremblay

Doc #: 1836493.1

Recycled Paper

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

received
4/3/11

March 30, 2011

Via Electronic and Regular Mail

Ronald Kosinski
Deputy District Director
California Department of Transportation
District 7
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:
Notice of Intent to prepare a
Draft Environmental Impact Statement for State Route 710 Gap North Closure Project

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Federal Register Notice of Intent (NOI) for the State Route 710 Gap North Closure Project (March 9, 2011 Federal Register, Volume 76, Number 46). According to the NOI, the Federal Highway Administration (FHWA) assigned, and the California Department of Transportation (Caltrans) assumed, environmental responsibilities for this project pursuant to 23 U.S.C. 327. Caltrans, as the delegated National Environmental Policy Act (NEPA) agency, will prepare an Environmental Impact Statement (EIS) on the proposed project located in Los Angeles County. The NOI does not provide any specific information regarding compliance with the California Environmental Quality Act (CEQA) although there is a passing reference to a NEPA/CEQA process. The NOI does not state whether the document will be a combined EIS/EIR or whether Caltrans will also be acting as the CEQA Lead Agency for this project. Metropolitan requests clarification on this point

The project is intended to alleviate congestion believed to be due to an existing gap in Route 710. The scope of the proposed project may include, but not be limited to: surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems, local street upgrades, traffic management systems and a no build alternative.

This letter conveys Metropolitan's comments on the proposed project as a potentially affected public agency.

700 N. Alameda Street, Los Angeles, California 90012 • Mailing Address: P.O. Box 54153, Los Angeles, California, 90054-0153 • Telephone: (213) 217-6000

The study area for this project has not been clearly defined, and Metropolitan requests receipt of this information as soon as it becomes available. Metropolitan owns and operates two pipelines in the vicinity of the existing 710 gap. The Garvey-Ascot Cross Feeder runs in a generally east-west direction and is intersected by State Route 710 just south of Valley Boulevard. The Palos Verdes Feeder runs in a generally north-south direction to the west of State Route 710. Metropolitan requests that Caltrans consider these facilities during the planning process for this project and identify the routes proposed for any construction activities.

Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Approval of the project should be contingent on Metropolitan's approval of design plans for portions of the proposed project that could impact its facilities.

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way. Please keep Metropolitan informed of ongoing developments.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation on this project. For further assistance, please contact Miss Connie Yee at (213) 217-5657.

Very truly yours,

John Shamma

John Shamma
Manager, Environmental Planning Team

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(J:\Environmental-Planning & Compliance\COMPLETED JOBS\March 2011\Job No. 2011032405 – SR 710 Gap North Closure)

Enclosure: Planning Guidelines

Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California

1. Introduction

a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.

b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.

b. Metropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.

c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.

d. Metropolitan's records of surveys must be referenced on the parcel and tract maps.

3. Maintenance of Access Along Metropolitan's Rights-of-Way

a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.

b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-feet-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to access ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.

c. The terms of Metropolitan's permanent easement deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear zone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.

d. The footings of any proposed buildings adjacent to Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan's property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior to any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

a. We encourage the use of Metropolitan's fee rights-of-way by governmental agencies for public street and utility purposes, provided that such use does not interfere with Metropolitan's use of the property, the entire width of the property is accepted into the agency's public street system and fair market value is paid for such use of the right-of-way.

b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

a. A green belt may be allowed within Metropolitan's fee property or easement.

b. All landscape plans shall show the location and size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

c. Absolutely no trees will be allowed within 15 feet of the centerline of Metropolitan's existing or future pipelines and facilities.

d. Deep-rooted trees are prohibited within Metropolitan's fee properties and/or easements. Shallow-rooted trees are the only trees allowed. The shallow-rooted trees will not be permitted any closer than 15 feet from the centerline of the pipeline, and such trees shall not be taller than 25 feet with a root spread no greater than 20 feet in diameter at maturity. Shrubs, bushes, vines, and ground cover are permitted, but larger shrubs and bushes should not be planted directly over our pipeline. Turf is acceptable. We require submittal of landscape plans for Metropolitan's prior review and written approval. (See Figure 3).

e. The landscape plans must contain provisions for Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.

f. Rights to landscape any of Metropolitan's fee properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or easements required.

6. <u>Fencing</u>

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details).

7. <u>Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets</u>

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.

b. We request that permanent utility structures within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.

c. The installation of utilities over or under Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.

d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alinement as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.

e. Utilities constructed longitudinally within Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.

f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

g. Overhead electrical and telephone line requirements:

1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Metropolitan. Under no circumstances shall clearance be less than 35 feet.

2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.

3) Line clearance over Metropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.

4) When underground electrical conduits, 120 volts or greater, are installed within Metropolitan's fee property and/or easement, the conduits must be incased in a minimum of three inches of red concrete. Where possible, above ground warning signs must also be placed at the right-of-way lines where the conduits enter and exit the right-of-way.

h. The construction of sewerlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of- way.

i. Cross sections shall be provided for all pipeline crossings showing Metropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assists others in locating and identifying its pipeline. Two-working days notice is requested.

k. Adequate shoring and bracing is required for the full depth of the trench when the excavation encroaches within the zone shown on Figure 4.

l. The location of utilities within Metropolitan's fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:

1) Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: A two-inch yellow warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

3) Sewer or storm drain pipeline: A two-inch green warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

4) Electric, street lighting, or traffic signals conduit: A two-inch red warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

5) Telephone, or television conduit: A two-inch orange warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

m. Cathodic Protection requirements:

1) If there is a cathodic protection station for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodic protection stations.

2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.

3) Within Metropolitan's rights-of-way, pipelines and carrier pipes (casings) shall be coated with an approved protective coating to conform to Metropolitan's requirements, and shall be maintained in a neat and orderly condition as directed by Metropolitan. The application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.

4) If a steel carrier pipe (casing) is used:

(a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).

(b) The steel carrier pipe shall be protected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.

n. All trenches shall be excavated to comply with the CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1539 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

o. Control cables connected with the operation of Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Service Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Right

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of Metropolitan to use its fee properties and/or easements for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove any of the facilities from the fee properties and/or easements, such removal and replacement shall be at the expense of the owner of the facility.

9. Modification of Metropolitan's Facilities

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

10. Drainage

a. Residential or commercial development typically increases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.

b. If water must be carried across or discharged onto Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr. _____ of Metropolitan's Operations Services Branch, telephone (213) 250-____, at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictions

a. Metropolitan's pipelines and conduits vary in structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must restricted to that which

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall be maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:

b. Part 1 of the conceptual plan shall include a complete summary of proposed transportation, handling, storage, and use of explosions.

c. Part 2 shall include the proposed general concept for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirements

a. When Environmental Documents Have Not Been Prepared

1) Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

2) In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:

a) Metropolitan shall be timely advised of any determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.

c) Metropolitan is to review and submit any necessary comments on the Negative Declaration or draft EIR.

d) Metropolitan is to be indemnified for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

b. <u>When Environmental Documents Have Been Prepared</u>

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

1) The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

2) You must agree to indemnify Metropolitan, its officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. <u>Metropolitan's Plan-Review Cost</u>

a. An engineering review of your proposed facilities and developments and the preparation of a letter response

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

b. A deposit of funds will be required from the developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.

c. Metropolitan's final billing will be based on actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. <u>Caution</u>

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

17. Additional Information

Should you require additional information, please contact:

Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

JEH/MRW/lk

Rev. January 22, 1989

Encl.

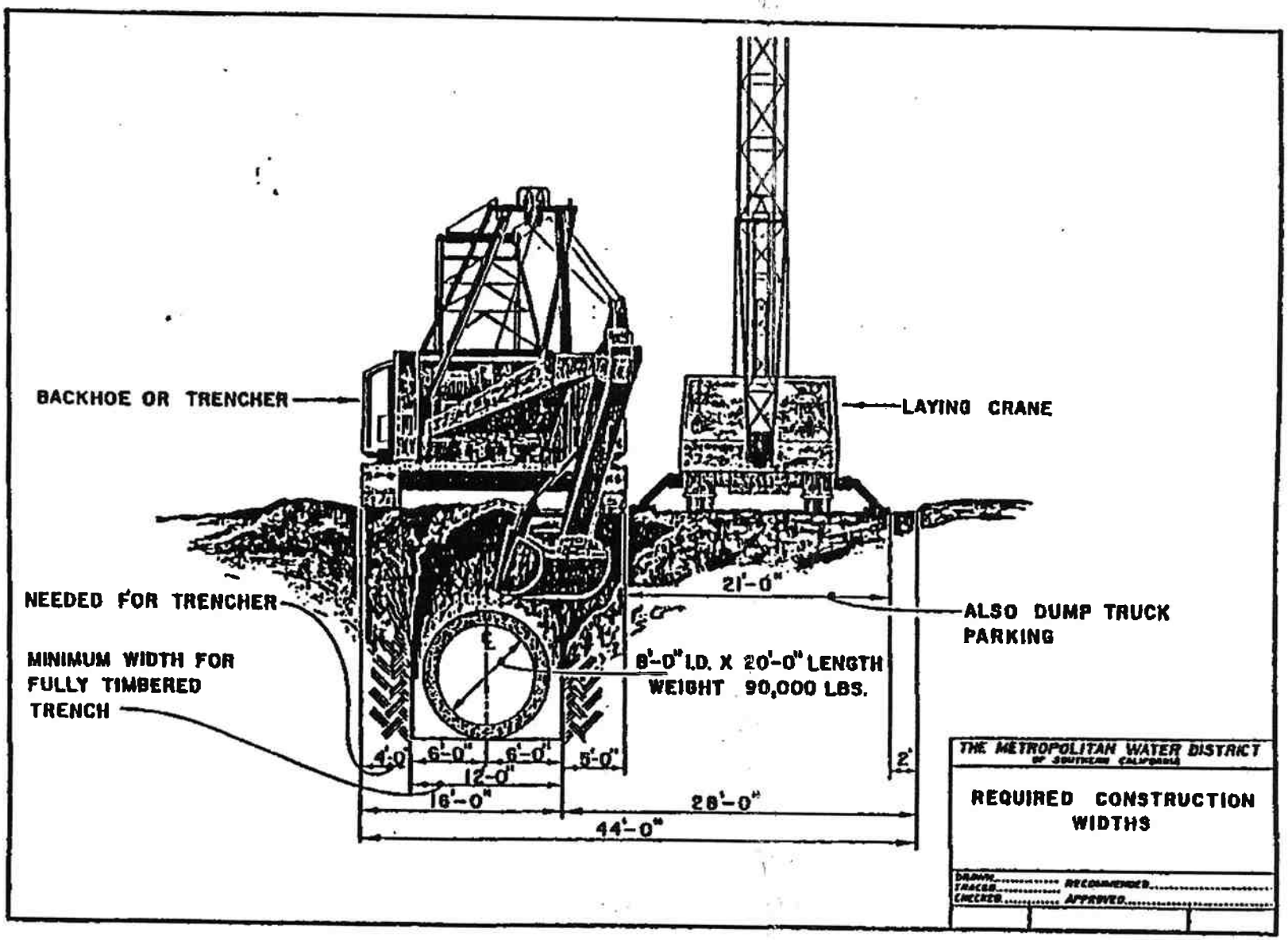
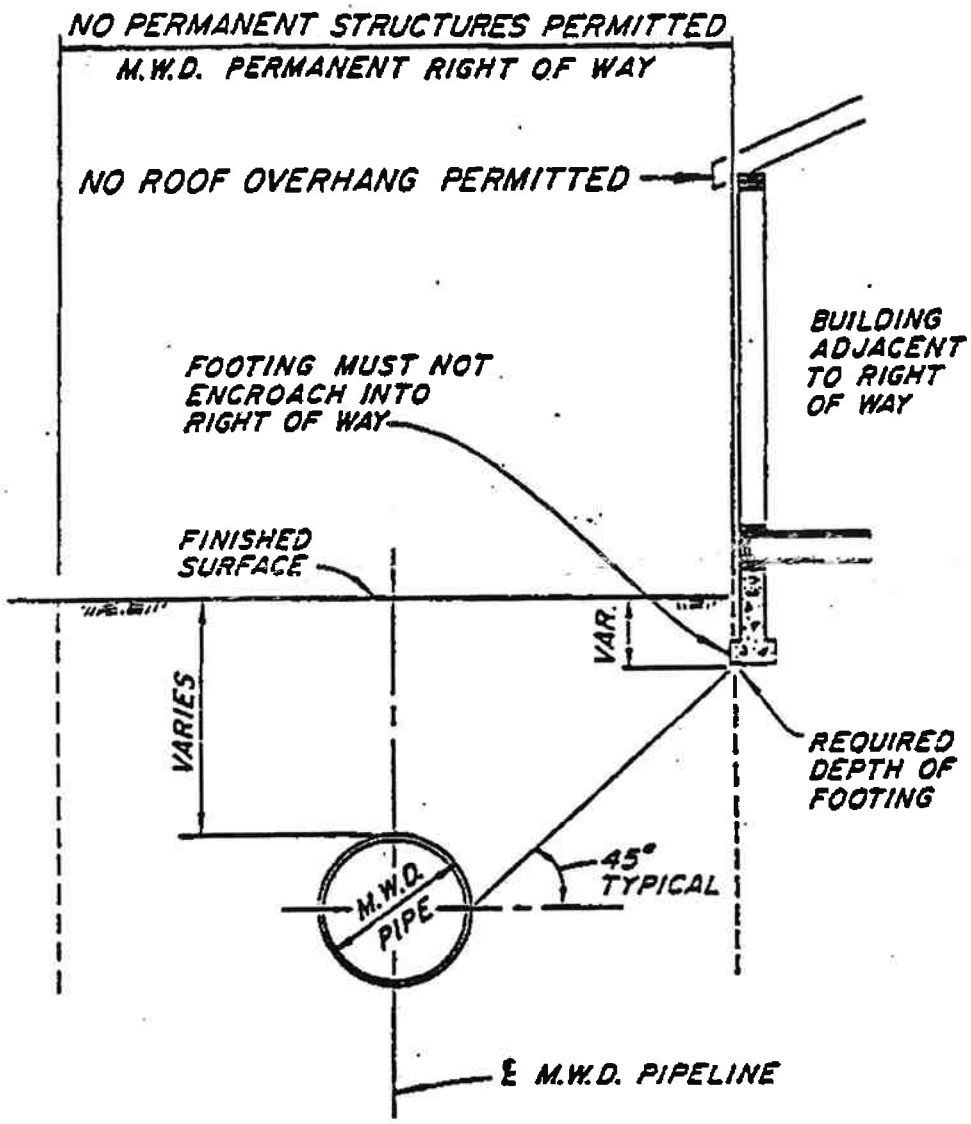

BACKHOE OR TRENCHER
LAYING CRANE
NEEDED FOR TRENCHER
MINIMUM WIDTH FOR FULLY TIMBERED TRENCH
21'-0"
ALSO DUMP TRUCK PARKING
8'-0" I.D. X 20'-0" LENGTH
WEIGHT 90,000 LBS.
4'-0"
6'-0"
6'-0"
5'-0"
12'-0"
16'-0"
28'-0"
44'-0"
2'
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
REQUIRED CONSTRUCTION WIDTHS
DRAWN
TRACED
CHECKED
RECOMMENDED
APPROVED

FIGURE 1



NOTE: M.W.D. PIPELINE SIZE, DEPTH, LOCATION AND WIDTH OF PERMANENT RIGHT OF WAY VARIES.

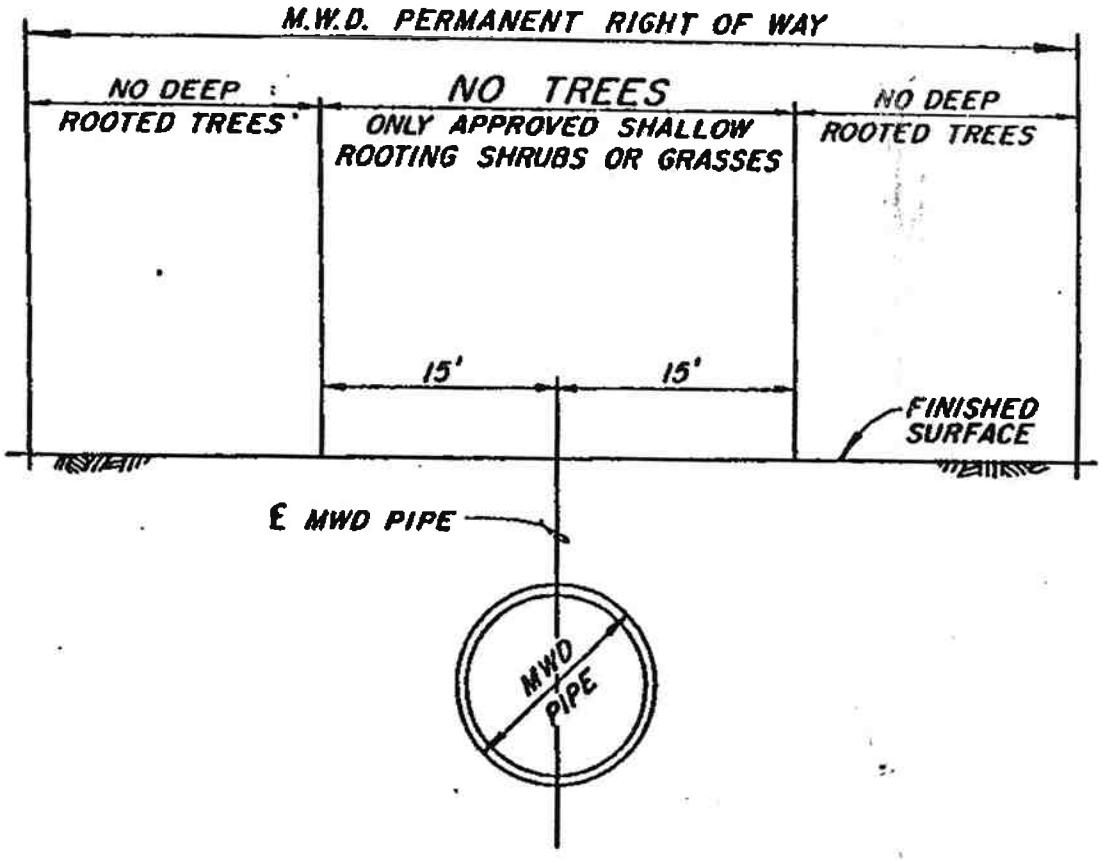
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

REQUIREMENTS FOR BUILDINGS AND FOOTINGS ADJACENT TO M.W.D. RIGHT OF WAY

DRAWN ____ RECOMMENDED ____
TRACED ____
CHECKED ____ APPROVED ____

FIGURE 2

11-67 DIETERICH-POST CLEARPRINT 1063



THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

LANDSCAPE GUIDELINES FOR M.W.D. RIGHT OF WAY

DRAWN..... RECOMMENDED.....
TRACED.....
CHECKED..... APPROVED.....

FIGURE 3

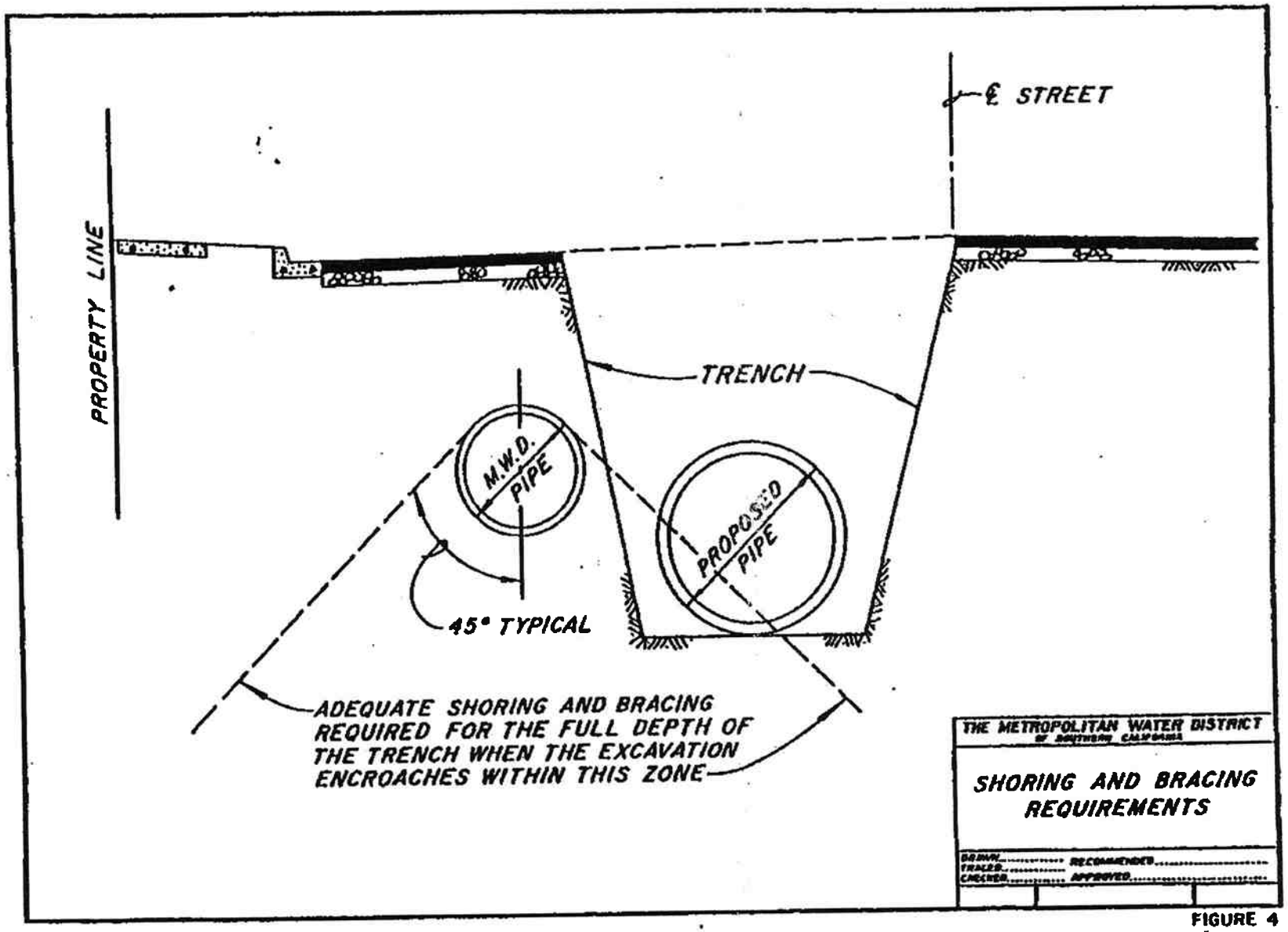
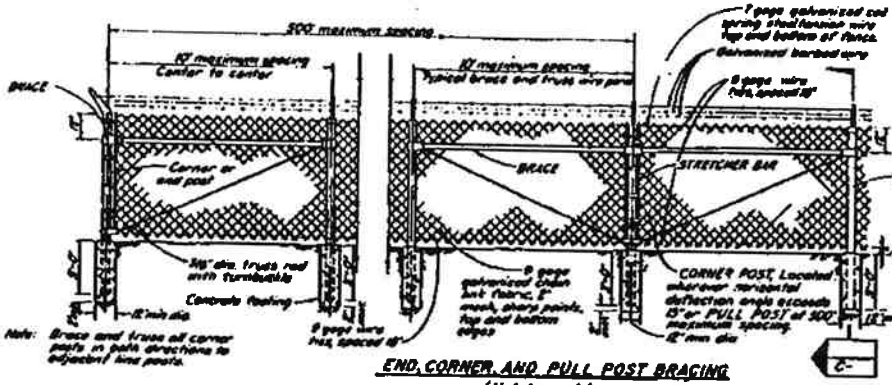
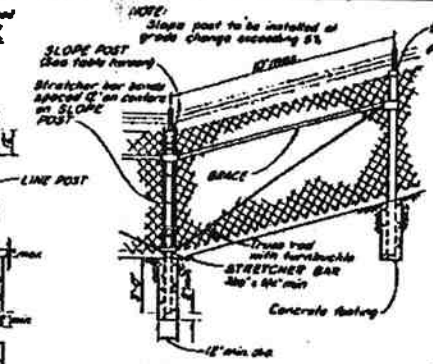

℄ STREET
PROPERTY LINE
TRENCH
M.W.D. PIPE
PROPOSED PIPE
45° TYPICAL
ADEQUATE SHORING AND BRACING REQUIRED FOR THE FULL DEPTH OF THE TRENCH WHEN THE EXCAVATION ENCROACHES WITHIN THIS ZONE
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
SHORING AND BRACING REQUIREMENTS
DRAWN
TRACED
CHECKED
RECOMMENDED
APPROVED

FIGURE 4

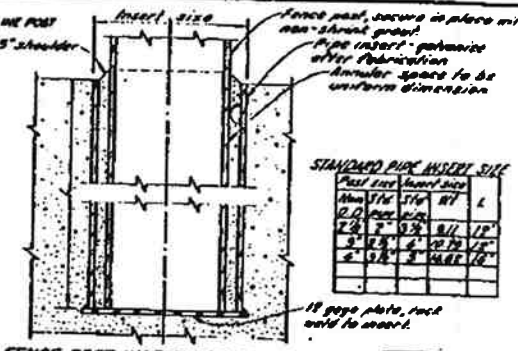
SPECIFICATIONS NO. SHEET NO.



END, CORNER, AND PULL POST BRACING
(Not to scale)



TYPICAL FENCE ON SLOPE
(Not to scale)

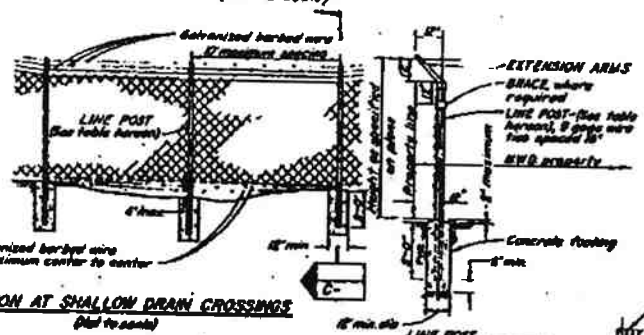


STANDARD PIPE INSERT SIZE

Post size Nom O.D.	Insert size Pipe	Plate O.D.	Plate Wt	L
2 1/2"	2"	3 3/4"	8 1/2	12"
3"	2 1/2"	4"	10 7/8	12"
4"	3 1/2"	5"	14.88	16"

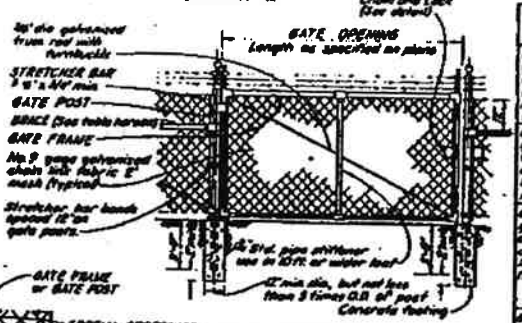
FENCE POST INSERT FOR CONCRETE WALL AND CONCRETE CURB
(Not to scale)

1

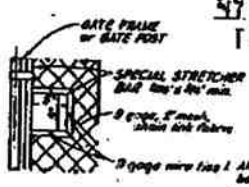


ELEVATION AT SHALLOW DRAIN CROSSINGS
(Not to scale)

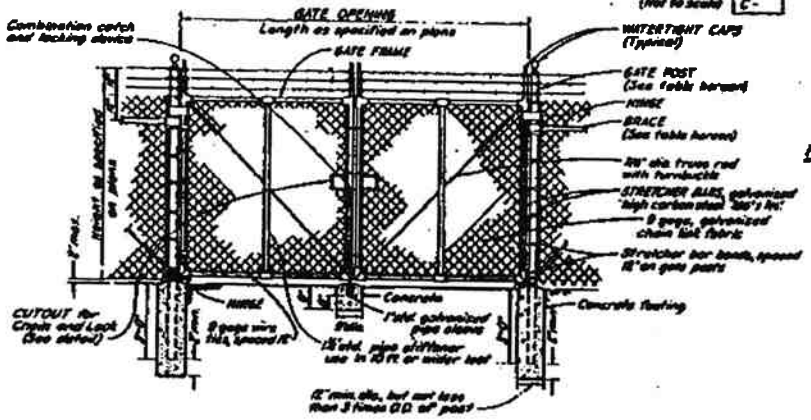
LINE POST SECTION
(Not to scale)
C-



SINGLE SWING GATE DETAIL
(Not to scale)



DETAIL OF CUTOUT FOR CHAIN AND LOCK
(Not to scale)



DOUBLE SWING GATE DETAIL
(Not to scale)

Use	Type	Nominal Size (Inches)	Actual O.D. (Inches)	Weight per foot (Pounds)
End, corner, slope, pull and gate posts (for single gates 6 feet or less in width and double gates 12 feet or less in width) for chain link fabric 72 inches or higher	Pipe	2 1/2	2.875	3.79
End, corner, slope, pull and gate posts (for single gates 6 feet or less in width and double gates 12 feet or less in width) for chain link fabric less than 72 inches height	Pipe	2	2.375	3.65
Gate posts for single swing gates over 6 feet but not over 13 feet in width and double swing gates over 12 feet but not over 26 feet in width.	Pipe	3 1/2	4.000	9.1
Gate posts for single swing gates over 13 feet but not over 18 feet in width and double swing gates over 26 feet but not over 36 feet in width.	Pipe	5	5.875	18.97
Gate posts for single swing gates over 18 feet in width and double swing gates over 36 feet in width	Pipe	6	6.625	24.70
Line posts for chain link fabric 72 inches or higher	Pipe	2	2.375	3.65
	H-Section	Wt 1 lb		4.10
Line posts for chain link fabric less than 72 inches in height	Pipe	1 1/2	1.900	2.72
	H-Section	Wt 1 lb		2.90
Braces	Pipe	1 1/2	1.850	2.27
	H-Section	Wt 1 lb		2.90
Fence tie rails	Pipe	1 1/2	1.900	2.72
Stiffeners for gates	Pipe	1 1/2	1.900	2.27

GENERAL NOTES

1. All ferrous parts and materials shall be galvanized after fabrication
2. Adjustable tighteners shall be turnbuckle or equivalent, having minimum 6" take up
3. Extension arms for barbed wire shall be steel, malleable iron or wrought iron and shall be attached to the top of the post with a 1/2 inch round head rivet. The extension arms shall carry three wires each at approximately 5 inch centers in a plane approximately 45° from the vertical.
4. All gate hinges shall be heavy duty malleable iron or steel, industrial service type, 270 degree swing, of approved quality and design.
5. Secure cap to post with 1/2 inch round head rivet

NO.	DATE	DWN.	CKD.	REVISION	DSC.	APP.

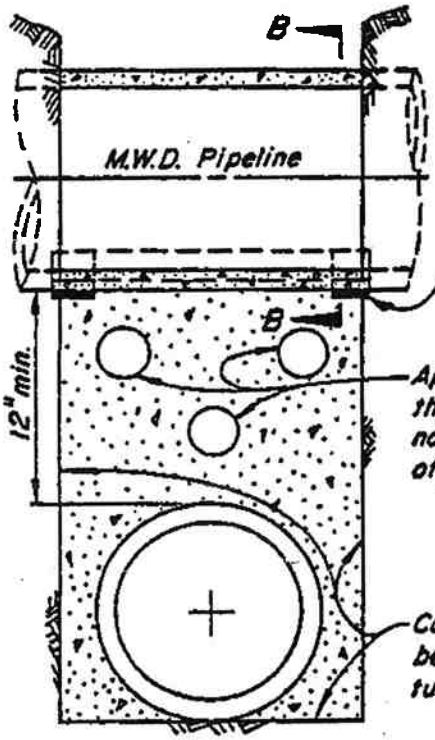
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
DISTRIBUTION SYSTEM

CHAIN LINK FENCE DETAILS

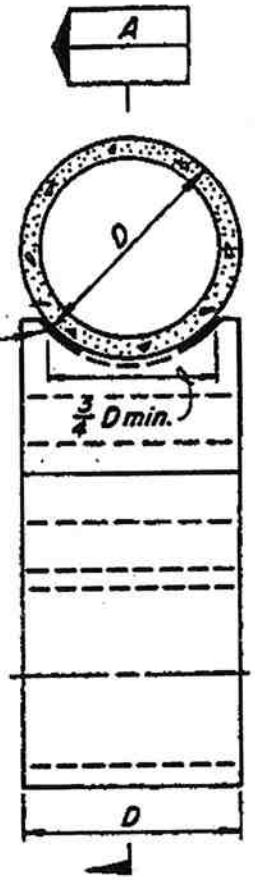
DESIGNED DRAWN CHECKED RECOMMENDED APPROVED
MODEL GROUP ENG. LOS ANGELES

REVISED	CHECKED	DATE
GENERAL REVISIONS	T.O.B.	CHK.
MECH.	FINALS	C.J.C.
INTERPRETIVE CORRECTIONS	CHK.	DATE

FIGURE 5

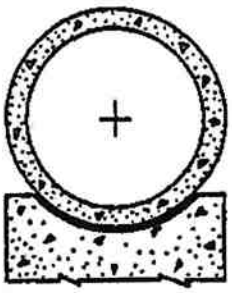


SECTION "A-A"



CROSS SECTION

1. Supporting wall shall have a firm bearing on the subgrade and against the side of the excavation.
2. Premolded expansion joint filler per ASTM D-1751-73 to be used in support for steel pipe only.
3. If trench width is 4 feet or greater, measured along centerline of M.W.D. pipe, concrete support must be constructed.
4. If trench width is less than 4 feet, clean sand backfill, compacted to 90% density in accordance with the provisions of ASTM Standard D-1557-70 may be used in lieu of the concrete support wall.



SECTION "B-B"

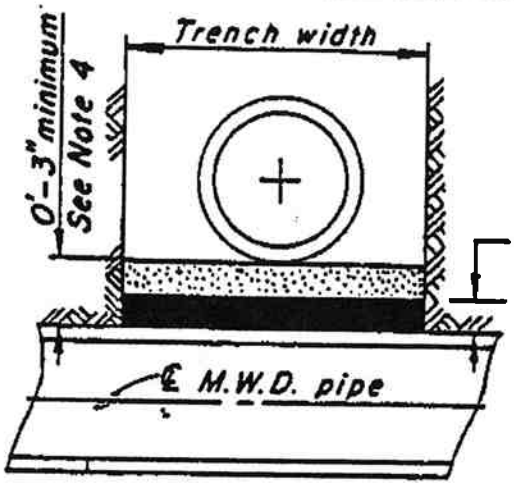
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

TYPICAL SUPPORT FOR M.W.D. PIPELINE

DRAWN ..... RECOMMENDED .....
TRACED .....
CHECKED ..... APPROVED .....

C-9547

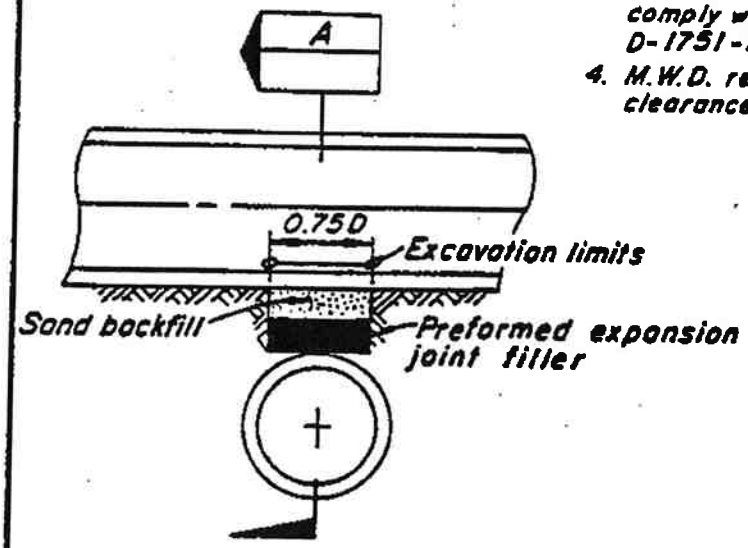
11-47 DIETERICH-POST CLEARPRINT 1063



SECTION A

NOTES

1. This method to be used where the utility line is 24" or greater in diameter and the clearance between the utility line and M.W.D. pipe is 12" or less.
2. Special protection may be required if the utility line diameter is greater than M.W.D. pipe or if the cover over the utility line to the street surface is minimal and there is 12" or less clearance between M.W.D. pipe and the utility line.
3. Preformed expansion joint filler to comply with ASTM designation D-1751-73.
4. M.W.D. requests 12" minimum clearance whenever possible.



CROSS SECTION

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

TYPICAL EXPANSION JOINT FILLER PROTECTION FOR OVERCROSSING OF M.W.D. PIPELINE

DRAWN ____ RECOMMENDED ____
TRACED ____
CHECKED ____ APPROVED ____

C-11632

RECEIVED 4/14/11

City of Monterey Park
320 W. Newmark Avenue Monterey Park CA 91754-2896
www.ci.monterey-park.ca.us

CITY COUNCIL
Betty Tom Chu
Mitchell Ing
David T. Lau
Teresa Real Sebastian
Anthony Wong

CITY CLERK
David Barron

CITY TREASURER
Joseph Leon

March 21, 2011

Ronald Kosinski, Deputy District Director RK
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012.

RE: 710 GAP CLOSURE PROJECT EIR

Dear Mr. Kosinski:

For more than a half century the City of Monterey Park has had an unenviable front seat to the chaos caused by a 4.5-mile gap in the County's basic freeway grid. We suffer a Sigalert every business day. When other cities talk about not wanting vehicle pollution by their homes and schools they are saying loud and clear, "Leave the congestion next to Monterey Park!"

The 710 Gap Closure Project is not a transportation exercise or community discussion subject, it is our health and our quality of life. As you may be aware, Monterey Park is home to thousands of immigrant seniors, many of whom come to this country with pre-existing respiratory issues. The pollutants generated by the gap only exasperate these conditions. So we ask that you pay special attention to the pleas of this city.

First, Speed up the process. With Measure R funds in hand, the proceeds from the Caltrans properties in the corridor and promises of private support, the stars are aligned for a solution at long last. Make the most of it by rejecting all delays and by speeding the EIR study process aggressively. According to projections in the most recent EIR, the estimated three years of this environmental study will see 21 needless deaths, 1,830 unnecessary accidents and 1,199 tons of contaminating pollutants in the region while the gap stands unfilled. Finish the work quickly. Three years is much too long.

Second, stop the debate about alternatives. Clearly the best option is a tunnel and the best route is between the two existing stubs. Eliminate study of the other suggested alignments.

Third, while we decry the burden that this gap has put on Monterey Park, we nevertheless view this as a <u>regional</u> problem and that completion of the 710 will carry a significant <u>regional</u> benefit. Widen the EIR's aperture to view this in a regional context, studying regional congestion and pollution relief.

Specific to Monterey Park, the south portal should be north of the I-10. Otherwise the interchange will be unnecessarily complex and expensive. In designing the interchange and tunnel entrance, study how the transition from the northbound I-710 to the eastbound I-10 can absorb the expected traffic and not cause a back-up (as we are cursed with now) along the western edge of our city.

Thank you for considering our input to the EIR.

Sincerely,

Mayor Betty Tom Chu

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

March 21, 2011

Mr. Garrett Damrath

California Department of Transportation – District 7

100 S. Main Street
Los Angeles, CA 90504

Re: SCH#1982092310; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the: **"Interstate 710 Gap Closure Draft EIR Project;"** located in Los Angeles County, California

Dear Mr. Damrath:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources. The NAHC wishes to comment on the above-referenced proposed Project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) search resulted in; **Native American cultural resources were not identified** within ½ mile of the areas of potential effect (e.g. APE), based on the information in your NOP. The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254.10. The absence of evidence of archaeological items does not indicate that they do not exist at the subsurface and/or when groundbreaking activity occurs.

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to

obtain their recommendations concerning the proposed project. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy a Native American cultural resources.

Furthermore we recommend, also, that you contact the California Historic Resources Information System (CHRIS) for pertinent archaeological data within or near the APE, at (916) 445-7000 for the nearest Information Center in order to learn what archaeological fixtures may have been recorded in the APE.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

The response to this search for Native American cultural resources is conducted in the NAHC Sacred Lands Inventory, established by the California Legislature (CA Public Resources Code 5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code 6254.10) although Native Americans on the attached contact list may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of he NHA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibility threatened by proposed project activity.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,
Dave Singleton, Program Analyst

Attachment: Native American Contact List

Native American Contact List
Los Angeles County
March 21, 2011

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino Tongva Nation
Sam Dunlap, Chairperson
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
6515 E. Seaside Walk, #C Gabrielino
Long Beach , CA 90803
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dormae, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address Gabrielino Tongva
,
tattnlaw@gmail.com
310-570-6567

Gabrielino-Tongva Tribe
Bernie Acuna
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(310) 587-2203
(310) 428-7720 - cell
(310) 587-2281 - FAX

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Shoshoneon Gabrieleno Band of Mission Indians
Andy Salas, Chairperson
PO Box 393 Gabrieleno
Covina , CA 91723
(626) 926-4131
gabirelenoindians@yahoo.com
(213) 688-0181 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#1982092310; CEQA NOtice of Preparation (NOP) for the Interstate 710 Gap Closure draft Environmental Impact Report (DEIR); located in Los Angeles County, for which a Sacred Lands File search and Native American Contacts list were requested by the California Department of Transportation.

Native American Contact List
Los Angeles County
March 21, 2011

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
1875 Century Park East, Suite 1500
Los Angeles , CA 90067 Gabrielino
lcandelaria1@gabrielinoTribe.org
310-428-5767- cell
(310) 587-2281 - FAX

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

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Ramona Elementary School

Home of the Mustangs

509 West Norwood Place
Alhambra, California 91803
E-mail: ramona@alhambra.k12.ca.us
Phone: 626-308-2439 Fax: 626-308-2522

received
4/20/11

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street Mail Stop 16A
Los Angeles,CA 90012

Dear Mr. Kosinski,

RE: Support for the 710 N Gap Closure Project and Comments for Environmental Review

This writing is being sent to you so we can be on the record on the 710N Gap Closure project. We support a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed NOW.

Please include the following in the environmental analyses:

-the Gap has been in existence for nearly 40 years creating much confusion for drivers; let's fix this! The EIR should show how all freeways and major roads in the area in four directions will benefit from the closing the gap.

-air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved; The EIR should demonstrate both of these aspects to show actual project benefits

-our commutes will be easier and take less time to go to work and come home; The EIR should take into account how closing the gap improved the quality of life for many people

-jobs will be created during these tough economic times; The EIR should detail how the project helps our economy in creating jobs and in other ways such as the benefit to the tourism industry; for example, visitors to Los Angeles will actually be able to reach their destination when using the 710N freeway instead of being routed off through local communities.

Please continue the environmental process with all due speed. Remember we voted, along with 2/3 of all Los Angeles County voter, for Measure "R" that calls for the 710N Feeway to be completed.

We cannot wait another 40 years for this project to become a reality

Sincerely,

Barbara Wong Principal

• 2005 Title I Academic Achievement Award • 2005 National Standard Counseling Program Academy Award • 2004 California Distinguished School • 2004 Title I Academic Achievement Award • 2004 National Standards Counseling Program Academy Award • 2004 Los Angeles County "Best Practice" Site After School Enrichment • 2004 Alhambra School District Teacher of the Year • 2004 Governor's Performance Award • 2003 Title I Academic Achievement Award • 2002 Governor's Performance Award • 2001 Stellar Peer Mediator School Award • 2001 Los Angeles County "Best Practice" Site After School Enrichment • 2002 Governor's Performance Award • 2001 Governor's Performance Award • 2000 Governor's Performance Award •

California Natural Resources Agency

San Gabriel & Lower Los Angeles
RIVERS AND MOUNTAINS CONSERVANCY

Governing Board of the Conservancy

Frank Colonna, Chair
Environmental Public Member

Dan Arrighi, Vice Chair
Central Basin Water Association

Linda Adams
California Environmental Protection Agency

Denis Bertone
San Gabriel Valley Council of Governments

Barbara Carrera
San Gabriel Valley Water Association

John Laird, Secretary
California Natural Resources Agency

Ana J. Matosantos
Department of Finance

Troy Edgar
Orange County Division of the League of California Cities

Margaret Clark
San Gabriel Valley Council of Governments

Gloria Molina
Los Angeles County Board of Supervisors

Patrick O'Donnell
City of Long Beach

Gordon Shanks
Orange County Division of the League of California Cities

Ed Wilson
Gateway Cities Council of Governments

Ex Officio Members

Ruth Coleman
Department of Parks and Recreation

John Donnelly
Wildlife Conservation Board

Colonel R. Mark Toy
US Army Corps of Engineers

Bryan Speegle
Orange County Executive Office

Thomas M. Stetson
San Gabriel River Water Master

Bernie Weingardt
Angeles National Forest US Forest Service

Gail Farber
Los Angeles County Department of Public Works

Executive Officer
Belinda Faustinos

April 7, 2011

received 4/12/11

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South main Street, MS 16A
Los Angeles, CA 90012

RE: Comments for NOP for a Draft EIR/EIS for the 710 Gap Closure Project

Dear Mr. Ron Kosinski:

The San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (RMC) is grateful for the opportunity to provide comments on the NOP for a Draft EIR/EISa for the 710 Gap Closure Project. The RMC or Rivers and Mountains Conservancy was established as an independent State agency within the Resources Agency of the State of California to preserve urban open space and habitats in order to provide for low-impact recreation and educational uses, wildlife and habitat restoration and protection, and watershed improvements.

The goals of the RMC are described in "*Common Ground,*" the Conservancy's Watershed and Open Space Plan (found at http://www.rmc.ca.gov/plan/intro.html). The Plan presents a simple vision for the future: ***restore balance between natural and human systems in the watersheds***. The centerpiece of the Plan is a series of Guiding Principles that cities, federal, state and local agencies, communities, groups and individuals can use to plan preservation, restoration and establishment of future open space, water resources, and habitat projects. More than 60 cities in Los Angeles County have adopted this document.

The RMC has reviewed the NOP for a Draft EIR/EIS for the 710 Gap Closure Project and has the following comments. Given the Department of Transportation indicated the agency has determined an EIR will clearly be required and therefore under the CEQA guidelines there was no Initial Study prepared, the RMC's comments will be in regards to the scope and analysis of the Draft EIR. The analysis conducted for the Draft EIR should address potential environmental impacts including:

1. Land Use
   Disrupting the ability of established communities to access park land and open space
   Conflict with any city or county zoning designation or policy for park land or open space

2. Population and Housing
   Extension of this major transportation coordinator could potentially lead to substantial growth that would increase development pressure on the regions existing open space resources

Rivers and Mountains Conservancy · El Encanto · 100 N. Old San Gabriel Canyon Road · Azusa, CA 91702
Phone: (626) 815-1019 • Fax: (626) 815-1269 • E-mail: bfaustinos@rmc.ca.gov
www.rmc.ca.gov

3. Water

Impacts of added hardscape surfaces on the natural ground water infiltration that replenishes the regions groundwater basin. The basin are a major source of public potable water and added hardscape surfaces could potential reduce the input of water, impacting the sustainability of this vial natural resource and increasing the demand on imported water. Impacts associated with altering the direction or rate of flow of groundwater and/or groundwater quality should be evaluated in detail.
The Draft EIR/EIS should analysis the impacts associated with potentially tunneling or boring into groundwater basins. Once again, impacts associated with altering the direction or rate of flow of groundwater and/or groundwater quality should be evaluated in detail.

Impact of added hardscape surfaces in increasing the surface water loads within the regions flood control infrastructure and the added flooding hazards within the communities and private property located downstream.

Impacts of pollution discharge into and alteration of surface water bodies. Water quality impacts should be evaluated including temperate, dissolved oxygen, pH, heavy metals, turbidity, trash.

4. Air Quality

Impacts to habitat areas from added air quality pollution, such as fine particulate matter from both construction and operation of the project.

5. Biological Resources

Fracturing land that serve as open space, provide wildlife habitat and/or functioning as a wildlife corridor. Effects on endangered, threatened or rare species or their habitats.

Impacts to species that have been designated by local government. For example, impacts to Costal Live Oaks considering the City of Pasadena Tree Protection Ordinance. Impacts to any existing riparian habitat.

6. Hazards

Increased fire hazards within wildland, open space, and the wildland/urban interface. Rick of accidental release of hazardous substances into waterways and natural areas.

7. Noise

Impacts to adjacent habitat areas from added noise levels from both construction and operation of the project. Will air quality impacts reduce the quality of surrounding habitat?

8. Recreation

   Reduction of parks and recreational areas within areas lacking sufficient recreational resources.

   Increased demand for recreational amenities from increased population growth associated with the infrastructure improvement project.

Thank you for your consideration of these comments. If you have any questions please contact Luz Torres at 626-815-1019 ext. 1110 or at ltorres@rmc.ca.gov.

Sincerely,

Belinda V. Faustinos

Belinda V. Faustinos
Executive Officer

K:\Correspondence\Comment Letters\710GapClosure_Nop.doc

City of San Gabriel

◆ City With A Mission ◆ Founded 1771 ◆

April 13, 2011

RECEIVED 4/14/11

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

RE: Support for the 710N Gap Closure Project and Comments for Environmental Review

Dear Mr. Kosinski,

I am writing to express my support for the 710N Gap Closure Project and would appreciate it if you made this letter part of the official record. I strongly support the construction of a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed NOW.

Please include the following in the environmental analyses:

- The Gap has been in existence for nearly 40 years creating much confusion for drivers; let's fix this! The EIR should show how all the freeways and major roads in the area in four directions will benefit from the closing of the gap.

- Air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved; the EIR should demonstrate both of these aspects to show actual project benefits.

- Jobs will be created during these tough economic times; the EIR should detail how the project helps our economy in creating jobs and in other ways such as the benefit to the tourism industry; for example, visitors to Los Angeles will actually be able to reach their destination when using the 710N freeway instead of being routed off through local communities.

I urge you to continue the environmental process in an expeditious manner. It is important to remember that the voters of Los Angeles County voted overwhelmingly in favor of Measure "R," which calls for the 710N freeway to be completed.

City Hall: 425 South Mission Drive, San Gabriel, California ◆ Mail: P.O. Box 130, San Gabriel, California 91778-0130
◆ 626-308-2800 ◆ FAX 626-458-2830

We cannot wait another 40 years for this project to become a reality.

Thank you for your consideration and for adding this letter to the official record.

Sincerely,

David R. Gutierrez
Mayor
City of San Gabriel

Cc: Steven A. Preston, City Manager
Carol D. Barrett, Planning Manager
Darin Grilley, City Engineer

SEQUOYAH SCHOOL

A community of learners

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

RE: 710 Gap Closure Project
VIA CERTIFIED MAIL

RECEIVED 4/14/11

April 11, 2011

Dear Mr. Kosinski:

On behalf of the Sequoyah School community of students, faculty, parents, alumni, past parents, trustees and friends, this letter is written in response to the notice of scoping and initiation of studies for the 710 Gap Closure Project.

In an effort to contribute to thorough consideration of pertinent factors and viable alternatives, the Sequoyah community believes that the following should be addressed in the environmental impact report (EIR).

Aesthetic, social and economic impacts: The I- 710 corridor traverses vital established neighborhoods with significant historic properties. Sequoyah School, along with other schools, convalescent homes and medical centers, is one of several institutions situated in or adjacent to the corridor that provide valuable and essential services to the citizens of Pasadena and surrounding regions, which would be impacted by the 710 Gap Closure Project. The EIR should address what impact any closure, temporary suspension or relocation of such institutions may have on the Pasadena neighborhood and the surrounding region. Such analysis should include the impacts caused by the 710 Gap Closure Project to all historicallysignificant or aesthetically important properties along the 710 corridor.

The Sequoyah Educational Center, otherwise known as Sequoyah School, is located at 535 S. Pasadena Avenue. The school has leased the property from Caltrans since 1972. Sequoyah School serves 190 students in seven coeducational classes from kindergarten through junior high. The school community honors and reflects the ethnic, cultural and economic diversity of Southern California. 53% of the students are children of color. 43% of our students pay less than the maximum tuition.

Sequoyah's campus is located on the corner of Pasadena Avenue and California Boulevard in southwest Pasadena. The architecturally significant property, noted for its Craftsman and mid-century-modern buildings, was originally part of the Neighborhood Church, which first leased space to Sequoyah in 1958. In anticipation of the construction of the 710 freeway the original church was razed in 1974, leaving the parsonage, children's chapel and religious education buildings. Sequoyah's 2.35-acre campus incorporates these remaining buildings.

Immediately north of the complex is an unfinished portion of the Route 710 Freeway that connects to the Route 134 and the Route 210 freeways. Immediately to the south and west is the Markham Place

626 795 4351 sequoyahschool.org 535 South Pasadena Avenue Pasadena CA 91105-3001

Printed with soy ink on carbon-neutral paper – FSC-certified, 100% recycled post-consumer waste, processed chlorine free with 100% renewable energy.

Historic District, a collection of early 20th-century homes, nearly all of which were designed by architects.

The Sequoyah campus complex consists of four buildings, a Craftsman former parsonage (1910), the Mid-Century Modern Nursery School (1948), Children's Chapel (now known as the Library, 1954), Religious Education Building (known as the Milliken Building, 1956). Garrett Eckbo, an influential modernist landscape architect who later became Dean of the Architecture school at UC Berkeley, designed the landscape scheme. Renowned architectural photographer Julius Shulman photographed the buildings and landscape. His photographs are archived at the Getty Center.

The State Historic Properties Office has designated the Nursery School Building, Children's Chapel and Religious Education Building as individually eligible for inclusion in the National Register. The former Parsonage remains a contributor to the Markham Place Historic District. Boundaries for the Markham Place Historic District have been expanded to include 535 S. Pasadena Ave.

The Sequoyah community advocates for transportation alternatives that result in the release of properties along the 710 corridor from decades of Caltrans management. Releasing the properties would result in increasing private ownership, responsible preservation of historic properties, and revitalization of neglected housing stock, sidewalks and streets.

Traffic management and pedestrian safety: Sequoyah School is situated at the intersection of Pasadena Avenue and California Boulevard. At present, traffic on Pasadena Avenue accelerates towards the 134/210 freeway onramps regularly exceeding the posted speed limit in a school zone. Pedestrian crossing at the intersection of California Avenue and Pasadena Avenue is particularly dangerous as drivers are impatient to turn into Pasadena Avenue before onrushing traffic impedes access. The intersection at St. John Avenue where the 210 freeway off-ramp ends is also dangerous for pedestrians. This off-ramp loads traffic into a residential area that adjoins a city park used by many residents of the neighborhood including families with young children. The EIR should analyze existing and potential impacts on residential neighborhoods, hospital and school zones when considering transportation improvements and the impacts on the safety of children and pedestrians caused by the extension of the 710 corridor. Analysis should include the potential for enhanced congestion due to increased daily trip generation, safe ingress and egress to parking structures and lots, enforcement of speed limits along boulevards and streets, the location of pedestrian crossings, and ongoing maintenance of sidewalks and streets.

Air quality: At present traffic idles at the 210 off-ramp adjacent to residential apartments and Sequoyah School. Traffic also builds up along California Boulevard behind traffic signals during the morning and afternoon commutes. The daily impact of exhaust emissions from idling cars should be considered particularly in respect to hospital and school zones. If subsurface routes are recommended the potential impact of emissions from exhaust towers should be considered. Young children are especially vulnerable to emissions caused by automobiles traveling along freeways.

Construction mitigation: The EIR should study the potential impacts of construction on surrounding residential neighborhood, hospital and school zones. The EIR should consider traffic circulation, pedestrian safety, noise and dust control, availability of parking, diesel emissions, disposal and transportation of hazardous materials, soil contamination among other impacts.

Finally, would you please send copies of all public notices associated with the 710 Gap Closure Project and its EIR to me at the address below.

Please do not hesitate to contact me with any questions.

Sincerely,

Josh Brody
Director, Sequoyah School
535 S. Pasadena Avenue
Pasadena, CA 91105
jbrody@sequoyahschool.org
626-795-4351

cc: Bill Bogaard
Steve Madison
Anthony Portantino

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 · www.aqmd.gov

received
4/8/11

April 5, 2011

Ron Kosinski, Deputy District Directory
California Department of Transportation
100 S. Main Street, MS 16-A
Los Angeles, CA 90012

Notice of Preparation of a CEQA Document for the
I-710 Gap Closure Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft environmental impact report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the SCAQMD Website at: www.urbemis.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM2.5 emissions from construction and operational activities and processes. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Determination of Significance

When evaluating whether or not impacts from a proposed project are significant, CEQA Guidelines §15064.7[(a)], states, "Each public agency is encouraged to develop and publish thresholds of significant that the agency uses in the determination of the significance of environmental effects. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect..." Relative to air quality, the SCAQMD's recommended air quality significance thresholds can be found at the following URL: http://www.aqmd.gov/ceqa/hdbk.html. Alternatively, the lead agency can use its own air quality significance threshold as long as it has demonstrated that these significance thresholds meet the standards identified in the CEQA Guidelines §15064.7.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: http://www.aqmd.gov/prdas/aqguide/aqguide.html. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (http://www.aqmd.gov).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM
LAC110322-03
Control Number

CITY OF SOUTH EL MONTE

1415 N. SANTA ANITA AVENUE
SOUTH EL MONTE, CALIFORNIA 91733
(626) 579-6540 • FAX (626) 579-2107

ALL AMERICA CITY

Celebrating Our Past 50th Growing Our Future 1958 Anniversary 2008

received 4/18/11

April 11, 2011

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

RE: Support for the 710N Gap Closure Project and Comments for Environmental Review

Dear Mr. Kosinski,

I am writing to express my support for the 710N Gap Closure Project and would appreciate it if you made this letter part of the official record. I strongly support the construction of a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed NOW.

Please include the following in the environmental analyses:

- The Gap has been in existence for nearly 40 years creating much confusion for drivers; let's fix this! The EIR should show how all the freeways and major roads in the area in four directions will benefit from the closing of the gap.

- Air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved; the EIR should demonstrate both of these aspects to show actual project benefits.

- Jobs will be created during these tough economic times; the EIR should detail how the project helps our economy in creating jobs and in other ways such as the benefit to the tourism industry; for example, visitors to Los Angeles will actually be able to reach their destination when using the 710N freeway instead of being routed off through local communities.

I urge you to continue the environmental process in an expeditious manner. It is important to remember that the voters of Los Angeles County voted overwhelmingly in favor of Measure "R," which calls for the 710N freeway to be completed.

We cannot wait another 40 years for this project to become a reality.

Thank you for your consideration and for adding this letter to the official record.

Sincerely,

Louise Aguinaga
Mayor of South El Monte

cc: Mayor Pro-Tem, Hector Delgado
Councilwoman, Angelica Garcia
Councilman, Hans Ili
Councilman, Joseph Gonzales
City Manager, Anthony R. Ybarra

D-2 – Organizations

THE WAVERLY SCHOOL

RECEIVED 4/25/11

April 15, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

RE: State Route 710 Scoping Analysis

Dear Mr. Kosinski:

I am writing in my capacity as Head of School at The Waverly School.

The Waverly School is a pre-k through grade 12 private school, with classroom buildings located at 108 Waverly Drive, 67 West Bellevue Drive, and 96 Pasadena Avenue. All of these sites include outdoor play areas and are within one block of the existing State Route 710 right-of-way. We also lease a one acre space adjacent to 629 Pasadena Drive, which we use as a farm, outdoor classroom, and green play space.

We are very disturbed about several aspects of the proposed SR 710 tunnel. Because our facilities are within one block of the existing right-of-way, air quality and related health impacts are our greatest concerns. We request a "hot spot analysis" for all four of our locations due to them being sensitive receptor community sites.

We request a thorough study and specific information on locations, sizes, and the projected numbers of towers needed for each tunnel route. We ask that this study be done by experienced and respected scientists. We will need to know how the pollution caused from the tunnel will be cleaned. Also, what will happen to the pollution that is not able to be cleaned, especially in times of gridlock? Finally, if these towers are built, how will they be monitored and maintained?

On behalf of The Waverly School, thank you for consideration of our requests and we await your response.

Sincerely,

Heidi Johnson
Head of School

67 West Bellevue Drive, Pasadena, California 91105 ph: 626.792.5940 fax: 626.683.5460 www.thewaverlyschool.org

THE WAVERLY SCHOOL

received 4/14/11

April 6, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

RE: State Route 710 Scoping Analysis

Dear Mr. Kosinski:

I am writing in my capacity as Chair of the Board of Trustees of The Waverly School.

The Waverly School is a pre-K through 12th grade private school, with classroom buildings located at 108 Waverly Drive, 67 West Bellevue Drive, and 96 Pasadena Avenue. All of our school buildings include outdoor play areas. All of these sites are within one block of the existing State Route 710 right-of-way. The School also leases a 48,000 sq. ft. property adjacent to 629 Pasadena Avenue. The site is called the "Waverly Farm". The School uses this property as both an outdoor classroom and a recreation space, mostly for our elementary school students..

There are several aspects of the proposed SR 710 tunnel which are of conern to our School. With all of our facilities within a short distance of the existing right-of-way, air quality and related health impacts are of the utmost concern. With this in mind we request that the SR 710 tunnel EIR include a thorough "hot spot analysis" of all our school facilities.

We further understand that the vehicle exhaust from the tunnel will be "cleaned" and discharged through a series of cleaning towers. We would like to know the locations of any and all cleaning towers within the vicinity of all our School facilities, and what will be the air quality impacts adjacent to these towers. We would like to have a better understanding of the "cleaning" technology to be used in these towers, and what protections will be provided in case this technology does not perform as expected.

On behalf of the Waverly Board of Trustees, thank you for consideration of our request.

Very truly yours,

Charles E. Loveman, Jr.
Chair, Board of Trustees

67 West Bellevue Drive, Pasadena, California 91105 ph: 626.792.5940 fax: 626.683.5460

Huntington Hospital

Huntington Memorial Hospital
100 W. California Boulevard
P.O. Box 7013
Pasadena, California 91109-7013
(626) 397-5555 FAX (626) 397-2995

Stephen A. Ralph
President
Chief Executive Officer

March 14, 2011

Mr. Ron Kosinski RK
Deputy District Director
Division of Environmental Planning / Caltrans, District 7
100 S. Main Street, MS 16A
Los Angeles, California 90012

RE: SR-710 Environmental Impact Report / Scoping Requests

Dear Mr. Kosinski:

On behalf of Huntington Memorial Hospital, I wish to formally request the following elements be included in the SR-710 Environmental Impact Report:

- Designate Huntington Hospital as a sensitive receptor
- Conduct a hot spot analysis of air quality at and around Huntington Hospital
- Conduct a health impact/health risk assessment at and around Huntington Hospital

These elements should be included in the scope of the EIR in order to appropriately assess the impact of gases and other particulates that will be exhausted from the ventilation towers to be located immediately west of the hospital's campus.

We are, of course, concerned about the safety of our patients, employees and visitors, and we believe this information will be important in determining the full effect of the proposed project on Huntington Hospital and its surrounding neighborhoods.

Thank you for your consideration.

Sincerely,

Stephen A. Ralph
President and Chief Executive Officer

cc: Bill Bogaard
Steve Madison
William Sherman, M.D.
Jane Haderlein

PASADENA
AND
FOOTHILL
CHAPTER

AMERICAN
INSTITUTE
OF
ARCHITECTS

April 14, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

Ron_Kosinski@dot.ca.gov

Re: CEQA/NEPA Scoping Submissions
Proposed 710 Freeway Extension/Tunnel

Dear Mr. Kosinski,

The Executive Board and Membership of the Pasadena/Foothill Chapter of the American Institute of Architects have followed the evolution of the CEQA/NEPA process for the 710 Freeway extension to the 210 Freeway and find it necessary to insist that the project alternatives to be considered include other alternative measures beyond the proposed tunnel under the communities of El Sereno, Alhambra, South Pasadena and Pasadena or the more egregious proposal of the original open trench freeway.

We believe that this project as presently conceived risks the long-term negative diminution of health, safety and welfare of the immediate surrounding communities and therefore requires the study of real and reasonable alternatives that do not pose such risks. Carefully examined, these alternatives have the collateral benefit of providing better and more environmentally sustainable solutions to the dilemmas that the 710 transportation corridor presents to the vast multi-community region that it serves. As the problem encompasses the distribution of container cargo from and to the ports of Los Angeles and Long Beach to points east and west of the 710/210 connection, the aspect of commercial truck transportation impacting an already overburdened and outmoded freeway system demands alternatives that consider modern, state of the art, well integrated and energy efficient responses. At the very least, innovative solutions as exemplified by systems such as GRID (Gabriel River Infrastructure Development) and CargoRail, both of which propose integrated cargo offloading systems on railways separate from the freeway congestion, must be added to the field of project study.

We offer these simple observations:

1) The eastbound 210 is already impacted to failure in afternoon and evening peak hours.
2) Whether by tunnel or trench, the 710/210 connections will have huge volumes of competing passenger vehicle and trucks in gridlock with all the increased air pollution, and economic frustration that this implies.
3) Tunneling under land with no justifying vertical topography will entail tremendous lengths of entrance trenches either side of the tunnel ports.

555
So. Oak Knoll Ave.
Pasadena, CA 91101
626.796.7601
FAX 626.796.1352

director@aiapf.org

4) Clogged traffic in a tunnel shared by vehicles and highly polluting diesel trucks requires tremendous and ineffectual dissipation systems that will negatively impact the surrounding communities that include a major regional hospital.
5) There is at least one more topographically and 'tunnel friendly' route under the Mount Washington area to the 210 that is not and must be considered in this process.
6) Cost effective multi-modal, low impact alternatives to more efficiently distribute and disperse existing traffic congestion at the current 710 terminus should be implemented before any larger project is initiated.
7) Our ports are not presently comparable to other major Pacific ports in the volume of shipping that they can handle efficiently in that they require significantly more space to handle a third of the volume achieved at other ports, and thus require a technologically advanced, comprehensively integrated and secure system of cargo handling in order to remain competitive and relevant in the global economy.

The broadly estimated expenditure proposed for the tunnel and conventional freeway completion pours tremendous and scarce resources into a solution that mitigates a lesser degree of the problem than should be expected of such an effort. If implemented without regard to the heart of the problem, this project may prevent or delay the possibility of real solutions. The regional economy will gain no lasting benefit but rather will be burdened with the effects of a half measure at full cost.

CalTrans District 7 has a tremendous responsibility to do the right thing and owes the regional communities the consideration of the valid, proven and reasonable alternatives described above. Along with other community groups and individuals in the region greatly affected by this undertaking AIA/PF supports their demand that these other and similar alternatives be included in the CEQA/EPA public process.

Yours Very Truly,

John B, Luttrell, President AIA/PF

Eric Charles Parlee, Director of Advocacy and Government Relations AIA/PF

Cc Jill Nicholson, Executive Director AIA/PF

Via U.S. Mail and Electronic Mail (sr710conversations@metro.net)

April 14, 2011

Mr. Ron Kosinski
Deputy District Director
Caltrans District 7
100 S. Main St.
Los Angeles, CA 90012

Re: Scoping Comments Regarding the Notice of Intent to Prepare a Draft Environmental Impact Statement and Notice of Preparation of a Draft Environmental Impact Report for the SR-710 North "Gap Closure" Project in Los Angeles County, California

Dear Deputy Director Kosinski:

On behalf of the El Sereno Organizing Committee ("ESOC"), a grassroots community-based organization from El Sereno whose mission is to advocate on behalf of the interests of the community in relation to the proposed 710 Freeway/Tunnel project, and the Natural Resources Defense Council ("NRDC"), a national, non-profit environmental organization with tens of thousands of members and activists in southern California, we submit the following scoping comments on the Notice of Intent ("NOI") to prepare a draft environmental impact statement ("EIS") and Notice of Preparation ("NOP") of a draft environmental impact report ("EIR") for what Caltrans refers to as the SR-710 North "Gap Closure" Project ("Project").

Our organizations have longstanding environmental justice concerns about building a freeway through the predominantly Latino neighborhood of El Sereno. ESOC was one of the named plaintiffs, and NRDC represented the plaintiffs as counsel, in the still-pending federal court lawsuit that alleged that the allocation of mitigation measures for the proposed 710 Freeway extension was racially discriminatory. *El Sereno Neighborhood Action Committee et al. v. California Transportation Commission*, No. CV-95-6106 (C.D. Cal. filed Sep. 13, 1995). If the Project moves forward now, no matter what form it ends up taking, it must not impose disproportionate environmental and housing burdens on the minority community of El Sereno. At a minimum, the EIR/EIS must consider and carefully analyze and mitigate any and all environmental justice impacts.

We also wish to express our dismay at the woefully inadequate outreach efforts that the Los Angeles County Metropolitan Transportation Authority ("Metro") has made thus far to the El Sereno community with respect to the Project. Located immediately north and west of the

Natural Resources Defense Council
1314 Second Street
Santa Monica, CA 90401
310-434-2300

El Sereno Organizing Committee
5302 Borland Road
Los Angeles, CA 90032
323-222-6625

intersection where SR-710 meets Valley Boulevard, El Sereno includes neighborhoods that will be directly and heavily impacted by the Project. Metro's ineffective attempts to include El Sereno residents in discussions about the Project have failed to live up to the agency's promises to involve "an education and public involvement program to seek both regional and community-based solutions that are suggested by you, your friends and family, your neighbors, and everyone else in your community."[1] This is unacceptable and contravenes the basic principles behind the National Environmental Policy Act ("NEPA") and the California Environmental Quality Act ("CEQA"), which state unequivocally that public participation is an essential part of the environmental review process. We are bringing this issue to Caltrans's attention now to ensure that these problems are fixed before the next round of community engagement on this Project.

In addition, we continue to strongly oppose all surface or tunnel highway alternatives for the Project. We are extremely concerned about the environmental and public health impacts that would result from building a five-mile highway or tunnel in this location. We also believe that the immense financial outlay necessary to fund a tunnel or surface route would be much more effectively directed toward transit investments and improvements across Los Angeles County. We believe, therefore, that it is essential that Caltrans not only fully assess and mitigate the significant impacts from the proposed Project under NEPA, CEQA, and their regulations, but also seriously consider other alternatives to the Project, including no project at all. We are encouraged that Caltrans is now taking a fresh look at the regional congestion problem and considering "heavy rail and bus/light rail systems, local street upgrades, [and] traffic management systems" as potential Project components. We would support a multi-modal alternative that included these components, rather than a highway or tunnel that would exacerbate the region's intractable air pollution and resultant health problems while doing nothing to reduce traffic congestion. We would not, however, support any multi-modal alternative that includes a connector road feature that would extend the freeway from its existing terminus at Valley Boulevard to Alhambra Avenue.

Finally, the EIR/EIS needs to address all of the adverse impacts the Project will have on the natural and human environment, including, but not limited to, impacts on air quality, cultural and historical resources, biological resources, water quality and supply, local and regional transportation patterns and traffic circulation, greenhouse gas emissions, and regional water infrastructure. The EIR/EIS also must propose adequate mitigation measures, include a comprehensive discussion of alternatives, and address the Project's compliance with other laws as required under NEPA and CEQA. With that in mind, our comments below focus in greater detail on a discrete few of the most critical issues that we want to make sure are fully considered by Caltrans.

1. The EIR/EIS must consider, analyze, and mitigate any and all environmental justice impacts.

We are troubled that neither the NOP nor the NOI contains any references to evaluating or mitigating environmental justice impacts, despite the fact that achieving environmental justice

[1] Metro, "SR-710 Conversations," at http://www.metro.net/projects/sr-710-conversations/.

has been made a priority for federal agencies by presidential decree. Exec. Order No. 12,898, 59 Fed. Reg. 7,629 (Feb. 16, 1994). What this means is that each federal agency is charged with incorporating environmental justice into its mission by "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States." Indeed, the Council on Environmental Quality ("CEQ") issued guidance in 1997 to assist federal agencies in carrying out this very mission.

As mentioned above, any highway route would cut through, and any tunnel route would begin extremely near, El Sereno, a neighborhood that already experiences high levels of mobile and stationary source emissions known to be toxic. The California Air Resources Board has observed that "Californians who live . . . along high traffic corridors are subsidizing the goods movement sector with their health."[2] Of particular concern are the adverse health effects of diesel emissions, dramatically increased local levels of which would be implicated by the construction and operation of a new highway or tunnel. The EIR/EIS must consider and implement mitigation measures to eliminate all environmental justice impacts implicated by the proposed Project, taking into account impacts introduced by the Project itself as well as cumulative impacts that arise from existing and foreseeable future sources of air, light, and noise pollution, including the tremendous increase in car and truck traffic that any highway Project alternative would facilitate.

We urge Caltrans to consult CEQ's guidance documents, consider and analyze the Project through the lens of addressing environmental justice issues, and implement mitigation measures to eliminate any and all environmental justice impacts implicated by the Project.

2. Caltrans and Metro must rectify their recent and historical failures to include the El Sereno community in the public participation process.

Both NEPA and CEQA require agencies to ensure and facilitate adequate public participation in the environmental review process. *See, e.g.,* 40 C.F.R. §§ 1500.1(b) (requiring NEPA procedures to "[e]nsure that environmental information is available to public officials and citizens before decisions are made and before actions are taken"), 1500.2(d) (requiring federal agencies to "[e]ncourage and facilitate public involvement in decisions which affect the quality of the human environment"); *see also Concerned Citizens of Costa Mesa v. 32nd Dist. Agric. Ass'n,* 42 Cal. 3d 929, 936 (1986) (stating that members of the public hold a "privileged position" in the CEQA process, reflecting "a belief that citizens can make important contributions to environmental protection and . . . notions of democratic decision-making"). Thus far, however, Caltrans and Metro have failed in carrying out this charge with respect to the El Sereno community.

The undersigned organizations first documented Metro's inadequate outreach efforts in a letter to Los Angeles City Councilmember José Huizar, dated March 3, 2011 and attached hereto

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for reference. In that letter, we pointed out the extremely low turnout of El Sereno residents at the "Series 1" community meeting in El Sereno on February 24, 2011, and explained that this actually is a recurring problem for this community with respect to this Project. We also suggested that Metro's repeated outreach failures to El Sereno are a systemic problem, illustrated by examples like the agency's insistence on directly translating into Spanish the ambiguous and uninspiring title of the "Series 1" meetings ("Transportation: Where Have We Been? Where Are We Going?"). This title was hopelessly vague and provided little to no context for the important discussions the meetings had hoped to facilitate. Finally, we asked for a meeting with Metro's principals, their outreach consultants, and elected officials including Councilmember Huizar to ensure that El Sereno residents have a real opportunity to participate in public dialogue regarding the Project.

The meeting we requested did not happen. In the meantime, Metro convened the "Series 2" (CEQA/NEPA on March 17, 2011) and "Series 3" (Scoping on March 29, 2011) community meetings in El Sereno. At those meetings, in addition to running into similar issues as those raised in our March 3rd letter, members of the El Sereno community experienced additional concerns and frustrations related to this project, as described below.

a. Lack of community engagement:

Metro had the same low turnout at the "Series 2" (CEQA/NEPA) meeting as it had at the "Series 1" (Conversations) meeting, despite the outreach consultants' promises that they were doing everything they could to get the word out. The El Sereno Organizing Committee, community residents and representatives from the LA-32 Neighborhood Council voiced their concerns about the low turnout during public comment.

b. Poor overall project planning:

The 20 total "Series 1-3" meetings were hastily planned and scheduled too closely together. This type of planning lends itself to problems associated with ineffective outreach as meetings were scheduled in many cases back to back, in different cities, on consecutive dates.

c. Confusion over what is the "project":

The "project" that the meetings were supposed to be about has never been defined, which continues to confuse people. Several comments were made expressing confusion with understanding what is being communicated in relation to the "project." Because of the vague and ambiguous explanations provided by the presenters, the community was very dissatisfied and unclear on what they should be commenting about at the Scoping meeting.

d. Questionable execution of community outreach:

Towards the end of the CEQA/NEPA meeting in El Sereno, a representative from the outreach consultant, Diverse Strategies for Organizing ("DSO"), read off a lengthy laundry list of targeted outreach efforts in El Sereno. This list included several community organizations, elected officials, the El Sereno Chamber of Commerce, school principals, churches, Barrio Action, El Sereno Stallions, El Sereno Recreation Center, the Voice newspaper, and the Senior Center, and also stated that flyer distribution at schools was pending clearance by the school bureaucracies. However, while the consultant was touting its "comprehensive outreach efforts" in El Sereno, residents were complaining about the consultant's failed efforts, as evidenced by the poor turnout.

It was clear to the community that the consultant had embarked on a poorly conceived and ineffectual outreach strategy, which resulted in a failure to engage the community of El Sereno. The consultant's descriptions of its outreach activities have been vague and incomplete, which, along with the poor turnout at two consecutive public meetings, led the community to the conclusion that the consultant's efforts were inadequate in their scope, planning and execution. To provide just one example, on March 17, 2011, the consultant finally sent out a flyer for the "Series 2" meeting. This flyer was transmitted via email at 1:24 PM, the same day of the "Series 2" meeting, approximately 4½ hours prior to the scheduled meeting time.

e. Failure by the outreach consultants to develop a strategic outreach plan:

The consultant's meeting flyers were unimaginative and generic, and contained uninspiring institutional text, layout and graphics. The flyers lacked any sense of need, importance, or urgency – characteristics essential to drawing the community to attend these meetings. The flyers did not even attempt to appeal to the specific concerns of the varying communities that were being targeted. There was no effort to consider messaging that would appeal to the diversity in demographics, especially as it relates to El Sereno. This revealed a serious lack of perception and understanding of the historical concerns that relate to a predominantly Latino community like El Sereno, versus non-Latino communities like South Pasadena and Pasadena.

Addressing linguistic concerns is another part of a successful strategic outreach campaign. Up until the consultant's untimely flyer on March 17th, there was no targeted outreach to monolingual, Spanish-speaking residents in El Sereno. This is of paramount concern. According to U.S. Census figures, in El Sereno, a predominantly Latino community with approximately 48,000 residents, there are approximately 79.4% "Language other than English" and 67.5% "Spanish-speaking language" households. This is particularly true of census tracts running along the proposed SR-710 Freeway surface and tunnel routes. Indeed, from a strategic standpoint, both Metro and the consultant utterly failed in determining that it was appropriate to wait to outreach to the Spanish-speaking residents of El Sereno until the 14th of 18 planned meetings.

f. Improvement in outreach for the "Series 3" (Scoping) meeting was not enough:

Although members of the El Sereno community attended the March 29, 2011 "Scoping" meeting in far greater numbers, this result was only minimally due to the consultant's efforts. At the strong urging of ESOC, the consultant purported to "canvass" the 710 corridor. However, the consultant's canvassing consisted of the same, ineffective flyers and was simply a "walking-man" effort. The consultant did not knock on doors or attempt to actually engage the community.

Because of the consultant's largely ineffective outreach efforts, ESOC decided to canvass the 710 corridor on a volunteer basis. ESOC went to every property in the corridor, knocked on every door that could be accessed, and spoke with residents in English and Spanish urging them to attend the meeting. ESOC also met with business owners and organizations on Huntington Drive, Eastern Avenue and Valley Boulevard to arrange to leave flyers for residents to pick up. ESOC left flyers at a total of 66 locations, and observed the consultant's flyers only at about three locations. ESOC also inserted 4,000 flyers into the Voice newspaper so that El Sereno residents would receive it at the pending distribution and inserted flyers into the church bulletin at Guadalupe Church in Rose Hills for their five Sunday masses. This is what we believe constitutes strategic and effective outreach.

It is apparent that the consultant's principal and most sustained outreach strategy consisted of a barrage of emails during the week of the meeting. ESOC believes that while email is convenient for many people, it should not be the primary outreach technique for our community. It is difficult for us to believe that the Spanish-speaking community in El Sereno can be effectively engaged via emails, Facebook, Twitter and webcasts, when few residents receive news about the community through those outlets. We believe that the community's increased numbers at the "Series 3" scoping meeting was due to the effective and strategic outreach put forth by ESOC, and not the consultant. Several attendees confirmed this during the public comment period.

g. Disorganized CEQA/NEPA presentations:

The Metro staffers who presented information about the CEQA/NEPA process used PowerPoint flow charts that did not correspond to the CEQA/NEPA flow charts distributed to meeting attendees. When this was pointed out by the El Sereno Organizing Committee at the South Pasadena CEQA/NEPA meeting, the staffers promised that it would not occur at the upcoming El Sereno meeting. They failed to keep their promise. As a result, many in the community remain confused about the environmental process.

h. Lack of clarity regarding submission of public comments gathered by Caltrans during the community meetings on the Geotechnical Study, and their possible submission during the Scoping process:

A significant issue was raised by a community member in terms of public comments and the "Series 3" (Scoping) process. At issue was what was to become of all the public comments made and recorded at the substantial public meetings following Caltrans's Geotechnical Study in early 2009. The community was led to believe that those comments were recorded for a purpose. What happened to those comments, and will they become part of the Scoping record? Metro officials fumbled with a response and the El Sereno community was left unclear on this issue.

At the "Series 2" meeting in El Sereno, Metro's CEQA/NEPA presenter stated that "the most important aspect of CEQA is the public involvement process." However, that process means absolutely nothing when the community is not informed about the process and is not engaged in it. The El Sereno community deserves better than this. As such, we are submitting these comments into the administrative record to call attention to this problem and to demand an immediate and lasting solution. We also would like to reiterate our request for a meeting as soon as possible with appropriate representatives from Caltrans, Metro, Metro's outreach consultants, and the elected officials copied on this scoping letter to discuss the inadequacies of outreach efforts in the El Sereno community to date; arrange for an effective process to gather the El Sereno community's input on issues relating to the 710 Project; and collaborate to improve outreach for all future phases of this Project.

3. The EIR/EIS must contain an accurate and complete project description.

Courts have long held that "[a]n accurate, stable, and finite project description" is an essential part of an informative and legally sufficient EIR. *See, e.g., County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 193 (1977). An accurate project description is needed to provide agencies and the public with "an intelligent evaluation of the potential environmental effects of a proposed activity." *McQueen v. Board of Directors of the Mid-Peninsula Regional Open Space District*, 202 Cal. App. 3d 1136, 1143 (1988).

As related in Section 2(c) above, community members are thoroughly confused about what exactly constitutes the "Project." For example, while the NOP states that the Project "may include" one or more highway or non-highway components, the NOI refers in the Summary section to a "proposed highway project." Which is it? As shown in the reports above, Metro staffers failed to provide the El Sereno community with any clarity in the pre-scoping and scoping meetings, which disadvantaged community members who took the time to try to participate in those meetings. We urge Caltrans to clarify the project description before the next round of public participation and community engagement.

4. The EIR/EIS must analyze greenhouse gas emissions.

Caltrans must consider and analyze the effects of greenhouse gas ("GHG") emissions from the Project. The EIR/EIS must contain an analysis of the extent to which the Project significantly affects the "quality of the human environment," which includes air quality. 42 U.S.C. § 4332(2)(C); *see* 40 C.F.R. §§ 1508.8 (defining "effects" as including "ecological . . . , economic, social, or health [effects], whether direct, indirect, or cumulative"), 1508.14 (defining "human environment" comprehensively to include "the natural and physical environment and the relationship of people with that environment"); Cal. Pub. Res. Code §§ 21082.2(a), 21100(b)(1) (requiring that an EIR discuss all significant impacts of a project, and that the lead agency make a determination as to whether the project may have any such significant impacts); Cal. Pub. Res. Code §§ 21002, 21081(a) (requiring that an EIR adopt feasible mitigation measures to reduce or avoid all significant environmental impacts). Cumulative effects clearly include impacts from climate change. 40 C.F.R. § 1508.27(b)(7) (defining "significance" as including "[w]hether the action is related to other actions with individually insignificant but cumulatively significant impacts").

The National Academy of Sciences recently confirmed in the first of a suite of studies called *America's Climate Choices* that climate change is occurring, is caused primarily by human activities, and poses significant risks for a broad range of human and natural systems. This reflects the overwhelming consensus view by the scientific community, which earlier had prompted the CEQ to issue draft guidance in February 2010 on "the ways in which Federal agencies can improve their consideration of the effects of [GHG] emissions and climate change in their evaluation of proposals for Federal actions under the National Environmental Policy Act (NEPA)."

In addition, NEPA requires a discussion of "possible conflicts between the proposed action and the objectives of Federal, State, and local land use plans, policies and controls for the area concerned." 40 C.F.R. § 1502.16(c); *see also* 40 C.F.R. § 1508.27(b)(10) (defining "significant" as including "[w]hether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment"). The EIR/EIS, therefore, must evaluate the relationship between the Project's proposed GHG emissions and any relevant California GHG emission reduction laws or policies, including the Global Warming Solutions Act of 2006 ("AB 32"), through which California has committed to reducing GHGs to 1990 levels by 2020, and the 2008 Sustainable Communities and Climate Protection Act ("SB 375"), which mandates that regions examine GHG emissions associated with infrastructure projects.

Clearly, GHG and climate change impacts must be considered under both NEPA and CEQA. Thus, we encourage Caltrans to follow closely CEQ's draft guidance and CEQA Guidelines section 15183.5, and conduct a rigorous GHG analysis to evaluate and mitigate all of the Project's GHG impacts.

5. Conclusion

NEPA requires federal agencies to analyze the environmental impact of actions that "significantly affect the quality of the human environment," and CEQA requires agencies to "identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." We urge Caltrans to uphold these laws. In doing so, we believe Caltrans will conclude that there are many better ways to address southern California's traffic congestion problems than by spending several billion dollars on a five-mile freeway or tunnel that would devastate public health and environmental and historic resources in El Sereno and throughout the study area. In addition, we strongly urge Caltrans and Metro to take immediate measures to improve outreach efforts in El Sereno, including, but not limited to, convening the meeting our respective organizations requested above, so that members of the El Sereno community can fully participate in this process as envisioned and required under both NEPA and CEQA.

Thank you for your consideration of our comments.

Very truly yours,

Hugo Garcia
President
El Sereno Organizing Committee
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Email: hugogarcia1@sbcglobal.net

Damon Nagami
Staff Attorney
Natural Resources Defense Council
Phone: (310) 434-2300
Email: dnagami@nrdc.org

Attachment (March 3, 2011 Letter to Councilmember Huizar)

cc: Los Angeles City Councilmember José Huizar
Congressmember Judy Chu
Congressmember Xavier Becerra
Assemblymember Gil Cedillo
Senator Ed Hernandez
Senator Kevin de Leon
Los Angeles County Supervisor Gloria Molina
Michael Miles, Caltrans District 7 Director
Doug Failing, Metro Director of Highway Programs
Lynda Bybee, Metro Deputy Executive Officer for Regional Communications
Susan Gilmore, Metro Public Affairs
Mary McCormick, MBI Outreach Consultant
James Rojas, President, Latino Urban Forum

March 3, 2011

Councilmember José Huizar, CD14
200 N. Spring Street, Room 465
Los Angeles, CA 90012

Dear Councilmember Huizar:

On behalf of the El Sereno Organizing Committee and the Natural Resources Defense Council (NRDC), we are writing to call attention to the low turnout of El Sereno residents at last week's "710 Conversations" meeting held on February 24th at the Los Angeles Christian Presbyterian Church. According to the sign-in sheets at the meeting, approximately eight members of the El Sereno community attended the meeting. Of that number, most were individuals from the LA-32 Neighborhood Council or had previous interest in the project. They were not residents who were new to the project. On February 24th, in conversations with MBI's Mary McCormick, Metro's principal outreach coordinator and meeting facilitator on this project, she assured us that Metro undertook extensive measures to reach out and notify the El Sereno community about this meeting. She further assured us that MBI, with the assistance of subconsultant DSO, had distributed meeting flyers to several key community locations throughout El Sereno and at businesses along Huntington Drive. Disturbingly, when Ms. McCormick was identifying the outreach locations in El Sereno, she mistakenly named several locations in South Pasadena. While we do not doubt that some type of outreach efforts were undertaken, they appear to have been minimal and ineffective, as they failed to turn out El Sereno residents on an issue in which this community has consistently shown tremendous interest over several decades.

At first glance, these circumstances may appear both puzzling and alarming; however, when viewed in a historical context, this is business as usual for El Sereno residents. This is not the first time Metro's or Caltrans's outreach efforts have failed to adequately inform the El Sereno community of important meetings related to the 710 Freeway saga. At a community meeting in 2006 held at the El Sereno Senior Center to discuss a preliminary SR710 tunneling feasibility study, while the room was packed with Metro and Caltrans's consultants, very few community members actually showed up. Like the current "SR710 Conversations" meetings, this meeting was part of a series of "Community Meetings" organized and facilitated by Metro. At that meeting, one of the undersigned, Mr. Garcia, voiced concerns to the project lead, Metro's Lynda Bybee, about issues of short notice and minimal outreach, poor community attendance, and the fact that the community was not allowed to voice public comment. Our concerns were ignored. At that meeting, Metro staff selected which public comments to present and address.

Similarly, in February 2009, Caltrans had a series of "Community Meetings" that mirrored Metro's efforts. Frustrated, the community, with support from the offices of then-Senator Gil Cedillo, then-Assemblymember Kevin de Leon and Councilmember Huizar, intervened and demanded that appropriate and effective outreach be implemented. To their credit, Caltrans and their consultants rectified the situation.

Much to the chagrin of the El Sereno community, however, history appears to be repeating itself with respect to the current SR710 "Conversations" meetings. As with previous instances, last week's paltry turnout is unacceptable. These repeated failures point to a systemic failure on the part of Metro to address a problem that must be fixed. For instance, with regard to last week's meeting, it may be that Metro's messaging did not communicate the purpose of the meeting in a manner that the residents of this community could clearly understand. Indeed, even in English, the title "Transportation: Where Have We Been? Where Are We Going?" was vague and ambiguous, and provided little context for the important discussions the meeting had hoped to facilitate. Poor attendance at public events is oftentimes due to poorly planned or inadequate outreach. We need to get to the bottom of this. We would like to see Metro's outreach plan for El Sereno, in its entirety, if one exists. We also would like to review the budget for the "SR710 Conversations" project. Specifically, we would like to know how much money is being paid for this particular project, what are the terms and scope of MBI's contract and any task orders carried out to date, and what are the terms and scope of any other related subcontracts between MBI and DSO or any other firm that is assisting MBI with its outreach efforts.

Additionally, in the hopes of rectifying these recurring issues, we would like to respectfully request your assistance in arranging a meeting that would include the appropriate Metro representatives and consultants, including Doug Failing, Lynda Bybee, Susan Gilmore, Mary McCormick, and Victor Griego; a representative from your office; representatives from the offices of State Assemblymember Gil Cedillo, County Supervisor Gloria Molina, and State Senator Kevin de Leon; and the undersigned to discuss, among other things, the possibility of re-scheduling the February 24th public meeting and undertaking meaningful and effective outreach to ensure that El Sereno residents have a real opportunity to participate in public dialogue. Given that additional "710 Conversations" are scheduled in El Sereno in the very near future (*e.g.*, the "Series 2" CEQA/NEPA meeting on March 17th and the "Series 3" Scoping meeting on March 29th), this meeting should take place as soon as possible.

Councilmember Huizar, you are well aware that El Sereno is an impacted community -- in fact, the most impacted community -- in relation to "conversations" related to the SR710. For this reason, Metro and Caltrans need to pay particular attention to the El Sereno community, not the opposite. You have consistently championed environmental causes such as Elephant Hill, the Northeast Los Angeles Interim Control Ordinance and the Northeast Los Angeles Hillside Zoning Ordinance. As our elected representative, we are again counting on your leadership and support for our community to bring about fundamental change to the manner in which El Sereno is treated by transportation agencies. The community does not deserve to continue to be subjected to the social and environmental injustices that have been brought to bear throughout the history of the proposed SR710 extension discussion.

Thank you in advance for your assistance in this important matter. Please do not hesitate to contact us if you have any questions.

Respectfully,

Hugo Garcia
President
El Sereno Organizing Committee
Phone: (323) 718-1223
Email: hugogarcia1@sbcglobal.net

Damon Nagami
Staff Attorney
Natural Resources Defense Council (NRDC)
Phone: (310) 434-2300
Email: dnagami@nrdc.org

cc: Assemblymember Gil Cedillo
Los Angeles County Supervisor Gloria Molina
Senator Kevin de Leon

Via U.S. Mail and Electronic Mail (sr710conversations@metro.net)

April 14, 2011

Mr. Ron Kosinski
Deputy District Director
Caltrans District 7
100 S. Main St.
Los Angeles, CA 90012

Re: Scoping Comments Regarding the Notice of Intent to Prepare a Draft Environmental Impact Statement and Notice of Preparation of a Draft Environmental Impact Report for the SR-710 North "Gap Closure" Project in Los Angeles County, California

Dear Deputy Director Kosinski:

On behalf of the El Sereno Organizing Committee ("ESOC"), a grassroots community-based organization from El Sereno whose mission is to advocate on behalf of the interests of the community in relation to the proposed 710 Freeway/Tunnel project, and the Natural Resources Defense Council ("NRDC"), a national, non-profit environmental organization with tens of thousands of members and activists in southern California, we submit the following scoping comments on the Notice of Intent ("NOI") to prepare a draft environmental impact statement ("EIS") and Notice of Preparation ("NOP") of a draft environmental impact report ("EIR") for what Caltrans refers to as the SR-710 North "Gap Closure" Project ("Project").

Our organizations have longstanding environmental justice concerns about building a freeway through the predominantly Latino neighborhood of El Sereno. ESOC was one of the named plaintiffs, and NRDC represented the plaintiffs as counsel, in the still-pending federal court lawsuit that alleged that the allocation of mitigation measures for the proposed 710 Freeway extension was racially discriminatory. *El Sereno Neighborhood Action Committee et al. v. California Transportation Commission*, No. CV-95-6106 (C.D. Cal. filed Sep. 13, 1995). If the Project moves forward now, no matter what form it ends up taking, it must not impose disproportionate environmental and housing burdens on the minority community of El Sereno. At a minimum, the EIR/EIS must consider and carefully analyze and mitigate any and all environmental justice impacts.

We also wish to express our dismay at the woefully inadequate outreach efforts that the Los Angeles County Metropolitan Transportation Authority ("Metro") has made thus far to the El Sereno community with respect to the Project. Located immediately north and west of the

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310-434-2300

El Sereno Organizing Committee
5302 Borland Road
Los Angeles, CA 90032
323-222-6625

intersection where SR-710 meets Valley Boulevard, El Sereno includes neighborhoods that will be directly and heavily impacted by the Project. Metro's ineffective attempts to include El Sereno residents in discussions about the Project have failed to live up to the agency's promises to involve "an education and public involvement program to seek both regional and community-based solutions that are suggested by you, your friends and family, your neighbors, and everyone else in your community."[1] This is unacceptable and contravenes the basic principles behind the National Environmental Policy Act ("NEPA") and the California Environmental Quality Act ("CEQA"), which state unequivocally that public participation is an essential part of the environmental review process. We are bringing this issue to Caltrans's attention now to ensure that these problems are fixed before the next round of community engagement on this Project.

In addition, we continue to strongly oppose all surface or tunnel highway alternatives for the Project. We are extremely concerned about the environmental and public health impacts that would result from building a five-mile highway or tunnel in this location. We also believe that the immense financial outlay necessary to fund a tunnel or surface route would be much more effectively directed toward transit investments and improvements across Los Angeles County. We believe, therefore, that it is essential that Caltrans not only fully assess and mitigate the significant impacts from the proposed Project under NEPA, CEQA, and their regulations, but also seriously consider other alternatives to the Project, including no project at all. We are encouraged that Caltrans is now taking a fresh look at the regional congestion problem and considering "heavy rail and bus/light rail systems, local street upgrades, [and] traffic management systems" as potential Project components. We would support a multi-modal alternative that included these components, rather than a highway or tunnel that would exacerbate the region's intractable air pollution and resultant health problems while doing nothing to reduce traffic congestion. We would not, however, support any multi-modal alternative that includes a connector road feature that would extend the freeway from its existing terminus at Valley Boulevard to Alhambra Avenue.

Finally, the EIR/EIS needs to address all of the adverse impacts the Project will have on the natural and human environment, including, but not limited to, impacts on air quality, cultural and historical resources, biological resources, water quality and supply, local and regional transportation patterns and traffic circulation, greenhouse gas emissions, and regional water infrastructure. The EIR/EIS also must propose adequate mitigation measures, include a comprehensive discussion of alternatives, and address the Project's compliance with other laws as required under NEPA and CEQA. With that in mind, our comments below focus in greater detail on a discrete few of the most critical issues that we want to make sure are fully considered by Caltrans.

1. The EIR/EIS must consider, analyze, and mitigate any and all environmental justice impacts.

We are troubled that neither the NOP nor the NOI contains any references to evaluating or mitigating environmental justice impacts, despite the fact that achieving environmental justice

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has been made a priority for federal agencies by presidential decree. Exec. Order No. 12,898, 59 Fed. Reg. 7,629 (Feb. 16, 1994). What this means is that each federal agency is charged with incorporating environmental justice into its mission by "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States." Indeed, the Council on Environmental Quality ("CEQ") issued guidance in 1997 to assist federal agencies in carrying out this very mission.

As mentioned above, any highway route would cut through, and any tunnel route would begin extremely near, El Sereno, a neighborhood that already experiences high levels of mobile and stationary source emissions known to be toxic. The California Air Resources Board has observed that "Californians who live . . . along high traffic corridors are subsidizing the goods movement sector with their health."[2] Of particular concern are the adverse health effects of diesel emissions, dramatically increased local levels of which would be implicated by the construction and operation of a new highway or tunnel. The EIR/EIS must consider and implement mitigation measures to eliminate all environmental justice impacts implicated by the proposed Project, taking into account impacts introduced by the Project itself as well as cumulative impacts that arise from existing and foreseeable future sources of air, light, and noise pollution, including the tremendous increase in car and truck traffic that any highway Project alternative would facilitate.

We urge Caltrans to consult CEQ's guidance documents, consider and analyze the Project through the lens of addressing environmental justice issues, and implement mitigation measures to eliminate any and all environmental justice impacts implicated by the Project.

2. Caltrans and Metro must rectify their recent and historical failures to include the El Sereno community in the public participation process.

Both NEPA and CEQA require agencies to ensure and facilitate adequate public participation in the environmental review process. *See, e.g.,* 40 C.F.R. §§ 1500.1(b) (requiring NEPA procedures to "[e]nsure that environmental information is available to public officials and citizens before decisions are made and before actions are taken"), 1500.2(d) (requiring federal agencies to "[e]ncourage and facilitate public involvement in decisions which affect the quality of the human environment"); *see also Concerned Citizens of Costa Mesa v. 32nd Dist. Agric. Ass'n,* 42 Cal. 3d 929, 936 (1986) (stating that members of the public hold a "privileged position" in the CEQA process, reflecting "a belief that citizens can make important contributions to environmental protection and . . . notions of democratic decision-making"). Thus far, however, Caltrans and Metro have failed in carrying out this charge with respect to the El Sereno community.

The undersigned organizations first documented Metro's inadequate outreach efforts in a letter to Los Angeles City Councilmember José Huizar, dated March 3, 2011 and attached hereto

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for reference. In that letter, we pointed out the extremely low turnout of El Sereno residents at the "Series 1" community meeting in El Sereno on February 24, 2011, and explained that this actually is a recurring problem for this community with respect to this Project. We also suggested that Metro's repeated outreach failures to El Sereno are a systemic problem, illustrated by examples like the agency's insistence on directly translating into Spanish the ambiguous and uninspiring title of the "Series 1" meetings ("Transportation: Where Have We Been? Where Are We Going?"). This title was hopelessly vague and provided little to no context for the important discussions the meetings had hoped to facilitate. Finally, we asked for a meeting with Metro's principals, their outreach consultants, and elected officials including Councilmember Huizar to ensure that El Sereno residents have a real opportunity to participate in public dialogue regarding the Project.

The meeting we requested did not happen. In the meantime, Metro convened the "Series 2" (CEQA/NEPA on March 17, 2011) and "Series 3" (Scoping on March 29, 2011) community meetings in El Sereno. At those meetings, in addition to running into similar issues as those raised in our March 3rd letter, members of the El Sereno community experienced additional concerns and frustrations related to this project, as described below.

a. Lack of community engagement:

Metro had the same low turnout at the "Series 2" (CEQA/NEPA) meeting as it had at the "Series 1" (Conversations) meeting, despite the outreach consultants' promises that they were doing everything they could to get the word out. The El Sereno Organizing Committee, community residents and representatives from the LA-32 Neighborhood Council voiced their concerns about the low turnout during public comment.

b. Poor overall project planning:

The 20 total "Series 1-3" meetings were hastily planned and scheduled too closely together. This type of planning lends itself to problems associated with ineffective outreach as meetings were scheduled in many cases back to back, in different cities, on consecutive dates.

c. Confusion over what is the "project":

The "project" that the meetings were supposed to be about has never been defined, which continues to confuse people. Several comments were made expressing confusion with understanding what is being communicated in relation to the "project." Because of the vague and ambiguous explanations provided by the presenters, the community was very dissatisfied and unclear on what they should be commenting about at the Scoping meeting.

d. Questionable execution of community outreach:

Towards the end of the CEQA/NEPA meeting in El Sereno, a representative from the outreach consultant, Diverse Strategies for Organizing ("DSO"), read off a lengthy laundry list of targeted outreach efforts in El Sereno. This list included several community organizations, elected officials, the El Sereno Chamber of Commerce, school principals, churches, Barrio Action, El Sereno Stallions, El Sereno Recreation Center, the Voice newspaper, and the Senior Center, and also stated that flyer distribution at schools was pending clearance by the school bureaucracies. However, while the consultant was touting its "comprehensive outreach efforts" in El Sereno, residents were complaining about the consultant's failed efforts, as evidenced by the poor turnout.

It was clear to the community that the consultant had embarked on a poorly conceived and ineffectual outreach strategy, which resulted in a failure to engage the community of El Sereno. The consultant's descriptions of its outreach activities have been vague and incomplete, which, along with the poor turnout at two consecutive public meetings, led the community to the conclusion that the consultant's efforts were inadequate in their scope, planning and execution. To provide just one example, on March 17, 2011, the consultant finally sent out a flyer for the "Series 2" meeting. This flyer was transmitted via email at 1:24 PM, the same day of the "Series 2" meeting, approximately 4½ hours prior to the scheduled meeting time.

e. Failure by the outreach consultants to develop a strategic outreach plan:

The consultant's meeting flyers were unimaginative and generic, and contained uninspiring institutional text, layout and graphics. The flyers lacked any sense of need, importance, or urgency – characteristics essential to drawing the community to attend these meetings. The flyers did not even attempt to appeal to the specific concerns of the varying communities that were being targeted. There was no effort to consider messaging that would appeal to the diversity in demographics, especially as it relates to El Sereno. This revealed a serious lack of perception and understanding of the historical concerns that relate to a predominantly Latino community like El Sereno, versus non-Latino communities like South Pasadena and Pasadena.

Addressing linguistic concerns is another part of a successful strategic outreach campaign. Up until the consultant's untimely flyer on March 17th, there was no targeted outreach to monolingual, Spanish-speaking residents in El Sereno. This is of paramount concern. According to U.S. Census figures, in El Sereno, a predominantly Latino community with approximately 48,000 residents, there are approximately 79.4% "Language other than English" and 67.5% "Spanish-speaking language" households. This is particularly true of census tracts running along the proposed SR-710 Freeway surface and tunnel routes. Indeed, from a strategic standpoint, both Metro and the consultant utterly failed in determining that it was appropriate to wait to outreach to the Spanish-speaking residents of El Sereno until the 14th of 18 planned meetings.

f. Improvement in outreach for the "Series 3" (Scoping) meeting was not enough:

Although members of the El Sereno community attended the March 29, 2011 "Scoping" meeting in far greater numbers, this result was only minimally due to the consultant's efforts. At the strong urging of ESOC, the consultant purported to "canvass" the 710 corridor. However, the consultant's canvassing consisted of the same, ineffective flyers and was simply a "walking-man" effort. The consultant did not knock on doors or attempt to actually engage the community.

Because of the consultant's largely ineffective outreach efforts, ESOC decided to canvass the 710 corridor on a volunteer basis. ESOC went to every property in the corridor, knocked on every door that could be accessed, and spoke with residents in English and Spanish urging them to attend the meeting. ESOC also met with business owners and organizations on Huntington Drive, Eastern Avenue and Valley Boulevard to arrange to leave flyers for residents to pick up. ESOC left flyers at a total of 66 locations, and observed the consultant's flyers only at about three locations. ESOC also inserted 4,000 flyers into the Voice newspaper so that El Sereno residents would receive it at the pending distribution and inserted flyers into the church bulletin at Guadalupe Church in Rose Hills for their five Sunday masses. This is what we believe constitutes strategic and effective outreach.

It is apparent that the consultant's principal and most sustained outreach strategy consisted of a barrage of emails during the week of the meeting. ESOC believes that while email is convenient for many people, it should not be the primary outreach technique for our community. It is difficult for us to believe that the Spanish-speaking community in El Sereno can be effectively engaged via emails, Facebook, Twitter and webcasts, when few residents receive news about the community through those outlets. We believe that the community's increased numbers at the "Series 3" scoping meeting was due to the effective and strategic outreach put forth by ESOC, and not the consultant. Several attendees confirmed this during the public comment period.

g. Disorganized CEQA/NEPA presentations:

The Metro staffers who presented information about the CEQA/NEPA process used PowerPoint flow charts that did not correspond to the CEQA/NEPA flow charts distributed to meeting attendees. When this was pointed out by the El Sereno Organizing Committee at the South Pasadena CEQA/NEPA meeting, the staffers promised that it would not occur at the upcoming El Sereno meeting. They failed to keep their promise. As a result, many in the community remain confused about the environmental process.

h. Lack of clarity regarding submission of public comments gathered by Caltrans during the community meetings on the Geotechnical Study, and their possible submission during the Scoping process:

A significant issue was raised by a community member in terms of public comments and the "Series 3" (Scoping) process. At issue was what was to become of all the public comments made and recorded at the substantial public meetings following Caltrans's Geotechnical Study in early 2009. The community was led to believe that those comments were recorded for a purpose. What happened to those comments, and will they become part of the Scoping record? Metro officials fumbled with a response and the El Sereno community was left unclear on this issue.

At the "Series 2" meeting in El Sereno, Metro's CEQA/NEPA presenter stated that "the most important aspect of CEQA is the public involvement process." However, that process means absolutely nothing when the community is not informed about the process and is not engaged in it. The El Sereno community deserves better than this. As such, we are submitting these comments into the administrative record to call attention to this problem and to demand an immediate and lasting solution. We also would like to reiterate our request for a meeting as soon as possible with appropriate representatives from Caltrans, Metro, Metro's outreach consultants, and the elected officials copied on this scoping letter to discuss the inadequacies of outreach efforts in the El Sereno community to date; arrange for an effective process to gather the El Sereno community's input on issues relating to the 710 Project; and collaborate to improve outreach for all future phases of this Project.

3. The EIR/EIS must contain an accurate and complete project description.

Courts have long held that "[a]n accurate, stable, and finite project description" is an essential part of an informative and legally sufficient EIR. *See, e.g., County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 193 (1977). An accurate project description is needed to provide agencies and the public with "an intelligent evaluation of the potential environmental effects of a proposed activity." *McQueen v. Board of Directors of the Mid-Peninsula Regional Open Space District*, 202 Cal. App. 3d 1136, 1143 (1988).

As related in Section 2(c) above, community members are thoroughly confused about what exactly constitutes the "Project." For example, while the NOP states that the Project "may include" one or more highway or non-highway components, the NOI refers in the Summary section to a "proposed highway project." Which is it? As shown in the reports above, Metro staffers failed to provide the El Sereno community with any clarity in the pre-scoping and scoping meetings, which disadvantaged community members who took the time to try to participate in those meetings. We urge Caltrans to clarify the project description before the next round of public participation and community engagement.

4. The EIR/EIS must analyze greenhouse gas emissions.

Caltrans must consider and analyze the effects of greenhouse gas ("GHG") emissions from the Project. The EIR/EIS must contain an analysis of the extent to which the Project significantly affects the "quality of the human environment," which includes air quality. 42 U.S.C. § 4332(2)(C); *see* 40 C.F.R. §§ 1508.8 (defining "effects" as including "ecological . . . , economic, social, or health [effects], whether direct, indirect, or cumulative"), 1508.14 (defining "human environment" comprehensively to include "the natural and physical environment and the relationship of people with that environment"); Cal. Pub. Res. Code §§ 21082.2(a), 21100(b)(1) (requiring that an EIR discuss all significant impacts of a project, and that the lead agency make a determination as to whether the project may have any such significant impacts); Cal. Pub. Res. Code §§ 21002, 21081(a) (requiring that an EIR adopt feasible mitigation measures to reduce or avoid all significant environmental impacts). Cumulative effects clearly include impacts from climate change. 40 C.F.R. § 1508.27(b)(7) (defining "significance" as including "[w]hether the action is related to other actions with individually insignificant but cumulatively significant impacts").

The National Academy of Sciences recently confirmed in the first of a suite of studies called *America's Climate Choices* that climate change is occurring, is caused primarily by human activities, and poses significant risks for a broad range of human and natural systems. This reflects the overwhelming consensus view by the scientific community, which earlier had prompted the CEQ to issue draft guidance in February 2010 on "the ways in which Federal agencies can improve their consideration of the effects of [GHG] emissions and climate change in their evaluation of proposals for Federal actions under the National Environmental Policy Act (NEPA)."

In addition, NEPA requires a discussion of "possible conflicts between the proposed action and the objectives of Federal, State, and local land use plans, policies and controls for the area concerned." 40 C.F.R. § 1502.16(c); *see also* 40 C.F.R. § 1508.27(b)(10) (defining "significant" as including "[w]hether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment"). The EIR/EIS, therefore, must evaluate the relationship between the Project's proposed GHG emissions and any relevant California GHG emission reduction laws or policies, including the Global Warming Solutions Act of 2006 ("AB 32"), through which California has committed to reducing GHGs to 1990 levels by 2020, and the 2008 Sustainable Communities and Climate Protection Act ("SB 375"), which mandates that regions examine GHG emissions associated with infrastructure projects.

Clearly, GHG and climate change impacts must be considered under both NEPA and CEQA. Thus, we encourage Caltrans to follow closely CEQ's draft guidance and CEQA Guidelines section 15183.5, and conduct a rigorous GHG analysis to evaluate and mitigate all of the Project's GHG impacts.

5. Conclusion

NEPA requires federal agencies to analyze the environmental impact of actions that "significantly affect the quality of the human environment," and CEQA requires agencies to "identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." We urge Caltrans to uphold these laws. In doing so, we believe Caltrans will conclude that there are many better ways to address southern California's traffic congestion problems than by spending several billion dollars on a five-mile freeway or tunnel that would devastate public health and environmental and historic resources in El Sereno and throughout the study area. In addition, we strongly urge Caltrans and Metro to take immediate measures to improve outreach efforts in El Sereno, including, but not limited to, convening the meeting our respective organizations requested above, so that members of the El Sereno community can fully participate in this process as envisioned and required under both NEPA and CEQA.

Thank you for your consideration of our comments.

Very truly yours,

Hugo Garcia
President
El Sereno Organizing Committee
Phone: (323) 718-1223
Email: hugogarcia1@sbcglobal.net

Damon Nagami
Staff Attorney
Natural Resources Defense Council
Phone: (310) 434-2300
Email: dnagami@nrdc.org

Attachment (March 3, 2011 Letter to Councilmember Huizar)

cc: Los Angeles City Councilmember José Huizar
Congressmember Judy Chu
Congressmember Xavier Becerra
Assemblymember Gil Cedillo
Senator Ed Hernandez
Senator Kevin de Leon
Los Angeles County Supervisor Gloria Molina
Michael Miles, Caltrans District 7 Director
Doug Failing, Metro Director of Highway Programs
Lynda Bybee, Metro Deputy Executive Officer for Regional Communications
Susan Gilmore, Metro Public Affairs
Mary McCormick, MBI Outreach Consultant
James Rojas, President, Latino Urban Forum

March 3, 2011

Councilmember José Huizar, CD14
200 N. Spring Street, Room 465
Los Angeles, CA 90012

Dear Councilmember Huizar:

On behalf of the El Sereno Organizing Committee and the Natural Resources Defense Council (NRDC), we are writing to call attention to the low turnout of El Sereno residents at last week's "710 Conversations" meeting held on February 24th at the Los Angeles Christian Presbyterian Church. According to the sign-in sheets at the meeting, approximately eight members of the El Sereno community attended the meeting. Of that number, most were individuals from the LA-32 Neighborhood Council or had previous interest in the project. They were not residents who were new to the project. On February 24th, in conversations with MBI's Mary McCormick, Metro's principal outreach coordinator and meeting facilitator on this project, she assured us that Metro undertook extensive measures to reach out and notify the El Sereno community about this meeting. She further assured us that MBI, with the assistance of subconsultant DSO, had distributed meeting flyers to several key community locations throughout El Sereno and at businesses along Huntington Drive. Disturbingly, when Ms. McCormick was identifying the outreach locations in El Sereno, she mistakenly named several locations in South Pasadena. While we do not doubt that some type of outreach efforts were undertaken, they appear to have been minimal and ineffective, as they failed to turn out El Sereno residents on an issue in which this community has consistently shown tremendous interest over several decades.

At first glance, these circumstances may appear both puzzling and alarming; however, when viewed in a historical context, this is business as usual for El Sereno residents. This is not the first time Metro's or Caltrans's outreach efforts have failed to adequately inform the El Sereno community of important meetings related to the 710 Freeway saga. At a community meeting in 2006 held at the El Sereno Senior Center to discuss a preliminary SR710 tunneling feasibility study, while the room was packed with Metro and Caltrans's consultants, very few community members actually showed up. Like the current "SR710 Conversations" meetings, this meeting was part of a series of "Community Meetings" organized and facilitated by Metro. At that meeting, one of the undersigned, Mr. Garcia, voiced concerns to the project lead, Metro's Lynda Bybee, about issues of short notice and minimal outreach, poor community attendance, and the fact that the community was not allowed to voice public comment. Our concerns were ignored. At that meeting, Metro staff selected which public comments to present and address.

Similarly, in February 2009, Caltrans had a series of "Community Meetings" that mirrored Metro's efforts. Frustrated, the community, with support from the offices of then-Senator Gil Cedillo, then-Assemblymember Kevin de Leon and Councilmember Huizar, intervened and demanded that appropriate and effective outreach be implemented. To their credit, Caltrans and their consultants rectified the situation.

Much to the chagrin of the El Sereno community, however, history appears to be repeating itself with respect to the current SR710 "Conversations" meetings. As with previous instances, last week's paltry turnout is unacceptable. These repeated failures point to a systemic failure on the part of Metro to address a problem that must be fixed. For instance, with regard to last week's meeting, it may be that Metro's messaging did not communicate the purpose of the meeting in a manner that the residents of this community could clearly understand. Indeed, even in English, the title "Transportation: Where Have We Been? Where Are We Going?" was vague and ambiguous, and provided little context for the important discussions the meeting had hoped to facilitate. Poor attendance at public events is oftentimes due to poorly planned or inadequate outreach. We need to get to the bottom of this. We would like to see Metro's outreach plan for El Sereno, in its entirety, if one exists. We also would like to review the budget for the "SR710 Conversations" project. Specifically, we would like to know how much money is being paid for this particular project, what are the terms and scope of MBI's contract and any task orders carried out to date, and what are the terms and scope of any other related subcontracts between MBI and DSO or any other firm that is assisting MBI with its outreach efforts.

Additionally, in the hopes of rectifying these recurring issues, we would like to respectfully request your assistance in arranging a meeting that would include the appropriate Metro representatives and consultants, including Doug Failing, Lynda Bybee, Susan Gilmore, Mary McCormick, and Victor Griego; a representative from your office; representatives from the offices of State Assemblymember Gil Cedillo, County Supervisor Gloria Molina, and State Senator Kevin de Leon; and the undersigned to discuss, among other things, the possibility of re-scheduling the February 24th public meeting and undertaking meaningful and effective outreach to ensure that El Sereno residents have a real opportunity to participate in public dialogue. Given that additional "710 Conversations" are scheduled in El Sereno in the very near future (*e.g.*, the "Series 2" CEQA/NEPA meeting on March 17th and the "Series 3" Scoping meeting on March 29th), this meeting should take place as soon as possible.

Councilmember Huizar, you are well aware that El Sereno is an impacted community -- in fact, the most impacted community -- in relation to "conversations" related to the SR710. For this reason, Metro and Caltrans need to pay particular attention to the El Sereno community, not the opposite. You have consistently championed environmental causes such as Elephant Hill, the Northeast Los Angeles Interim Control Ordinance and the Northeast Los Angeles Hillside Zoning Ordinance. As our elected representative, we are again counting on your leadership and support for our community to bring about fundamental change to the manner in which El Sereno is treated by transportation agencies. The community does not deserve to continue to be subjected to the social and environmental injustices that have been brought to bear throughout the history of the proposed SR710 extension discussion.

Thank you in advance for your assistance in this important matter. Please do not hesitate to contact us if you have any questions.

Respectfully,

Hugo Garcia
President
El Sereno Organizing Committee
Phone: (323) 718-1223
Email: hugogarcia1@sbcglobal.net

Damon Nagami
Staff Attorney
Natural Resources Defense Council (NRDC)
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Email: dnagami@nrdc.org

cc: Assemblymember Gil Cedillo
Los Angeles County Supervisor Gloria Molina
Senator Kevin de Leon

RECEIVED 4/14/11

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April 11, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation - District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

Re: Route 710 EIR/EIS Scoping Process

To Whom It May Concern:

This office has been retained by the No 710 Action Committee. Attached hereto is a letter from my client regarding the "scoping" process for a possible EIR/EIS on the Route 710 freeway so-called "gap closure" project. My client has identified serious issues and potential violations of state and federal law involving the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA").

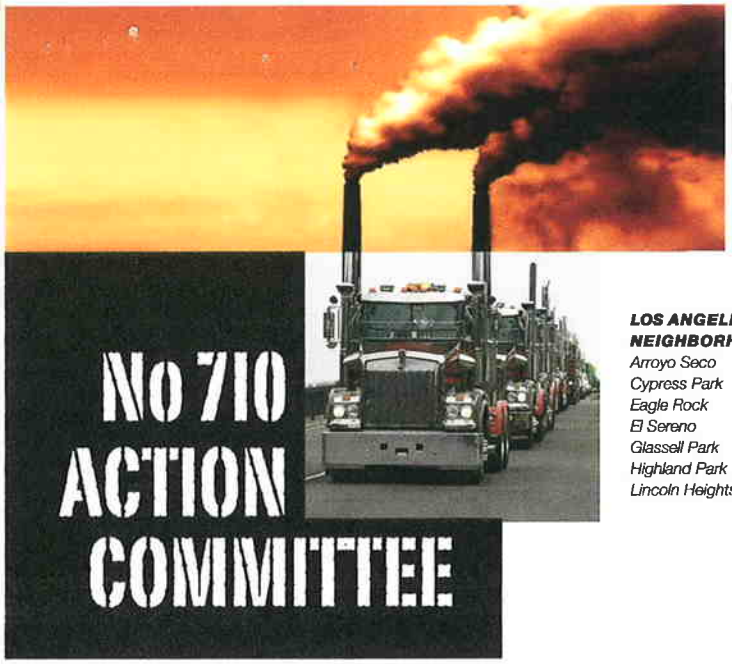
Please pay careful attention to the issues outlined in my client's attached letter. Please respond and make the needed revisions before proceeding with your "scoping" process to avoid the necessity of litigation. Thank you in advance for your attention to these matters.

Sincerely,

Christopher Sutton

cc: clients

enclosed: No 710 Action Committee letter



OPPOSITION GROUPS (PARTIAL LIST)
Natural Resources Defense Council
Glassell Park Improvement Association, Land Use Committee
Far North Glendale Homeowners Association
Town Council of Crescenta Valley
Glendale Homeowners Coordinating Council
LA RED, El Sereno
Green Scissors 2010 Report Groups
Friends of the Earth
Taxpayers for Common Sense
Environment America
Public Citizen

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

LOS ANGELES NEIGHBORHOOD COUNCILS
Arroyo Seco
Cypress Park
Eagle Rock
El Sereno
Glassell Park
Highland Park
Lincoln Heights

CITIES
City of Glendale
City of Los Angeles
City of La Canada Flintridge
City of South Pasadena

Post Office Box 51124,
Pasadena,
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626 799.0044

7 April 2011

Ron Kosinski, Deputy Director
Division of Environmental Planning
Caltrans – District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

Re: <u>Deficit Route 710 Scoping Session</u>

Dear Mr. Kosinski:

No 710 Action Committee is a coalition of community groups throughout Southern California opposed to wasteful expenditures and defective environmental analysis that have characterized the debate over the Route 710 project for the past fifty years. Because of the federal court injunction against any surface route, if a surface route is proposed by the Metropolitan Transportation Authority ("Metro"), the so-called "scoping" of the next EIR/EIS on the Route 710 must be reformed. If the surface route is contemplated, the "scoping" process must include NEW 2011 analysis for historic properties, air quality, the Multi-Mode Low Build alternatives, and a high level financial analysis. Otherwise, issues cannot be "flagged" in the manner required by CEQA and NEPA.

1. <u>1999 Preliminary Injunction Determined</u> <u>The 1993 Caltrans EIR/EIA Analysis Was Legally Defective</u>

In 1999, the U.S. District Court in Los Angeles determined that the 1993 Caltrans EIR/EIS for the Route 710 surface route freeway proposal was legally defective and violated both CEQA and NEPA. See, **<u>City of South Pasadena v. Slater</u> (C.D.Cal. 1999) 56 F. Supp.2d 1106.** It appears that Metro's "scoping" process for the potential future environmental studies may contain improper reliance on the defective 1993 EIR/EIS and the incomplete and defective analysis conducted for that document over eighteen years ago. Such reliance would violate both CEQA and NEPA. Caltrans and the federal government failed to appeal the 1999 preliminary injunction when they had the right to do so. All determinations in that case are final and binding on Caltrans and the Federal Highway Administration. Metro's proposed reliance on any of the outdated and defective 1993 analyses would be not only illegal, violating the 1999 injunction, but fundamentally wrong.

2. Defective 1985 Historic Resources Analysis

The "scoping" for the "gap closure" EIR/EIS must start with a complete NEW historic properties inventory of the various Route 710 proposed routes. Over twenty-five years has elapsed since the Caltrans 1985 historic inventory. Twenty-five years of more neglect and improper rehabilitation by Caltrans have rendered the prior survey outdated. The passage of twenty-five years has caused hundreds of other structures to become historic by passing the fifty-year age threshold. Scoping cannot "flag" environmental issues without a new historic properties inventory. Scoping itself must include a new historic resources inventory.

3. Defective 1992 Air Quality Analysis

The air quality analysis in the 1993 EIR/EIS is outdated and legally defective. The "scoping" process must include an ENTIRELY NEW air quality analysis before the "scoping" process commences. The eighteen years that have passed since the 1992 air quality analysis have rendered that analysis wholly irrelevant to today's conditions. Federal law requires particulate analysis to PM 2.5, but the 1992 regulation only required the less rigorous PM 10. Reliance on prior air quality analysis would violate CEQA and NEPA. Scoping depends on a new air quality analysis to "flag" issues under the current regulations and environment. Scoping itself must include a new air quality analysis.

4. Defective 1992 Analysis of Multi-Mode Low Build Alternative

The 1993 EIR/EIS contained no analysis of the Multi-Mode Low Build ("MMLB") alternatives proposed by South Pasadena and others. A separate MMLB report done by Caltrans was rejected by the 1999 injunction. The "scoping" must first include a complete analysis of the MMLB in order to comply with CEQA and NEPA. Otherwise, the "scoping" will be unable to treat the MMLB as an alternative or be able to "flag" all potential environmental benefits associated with the MMLB. Scoping itself must include a full MMLB analysis.

5. Detailed Cost Analysis Must be Included To Determine if Mitigation Measures Will be Too Costly to Undertake

The 1999 injunction found that a project financial analysis is key to understanding the environmental impacts. The judge cited **Title 23, United States Code, section 134(h)(2) and Title 23, Code of Federal Regulations, section 450.324**. In addition, the Federal Highways Administration ordered Caltrans to perform the financial analysis in the 1998 Record of Decision ("ROD") and again in the 2003 ROD rescission letter. Metro is acting with and under Caltrans and therefore bound by these prior decisions, laws, and administrative directives.

The 1993 EIR/EIS failed to include any cost analysis. The feasibility of the project directly involves mitigation measures related to air quality, historic resources, groundwater impacts, long-term seismic risks, and liquefaction risks due to groundwater. If the overall project is not financially viable, added environmental mitigation measures could be needed after construction commences. Thus a high level and detailed financial analysis must be completed as part of "scoping" under federal law. The Orange County Transportation Authority recently abandoned a proposed Orange County/Riverside tunnel proposal when it became clear before "scoping" that it was not financially viable ---- No tolls would be generated during years of construction, but debt service would be required from the first borrowing of billions. Other environmentally useful transit projects could be sacrificed and added environmental impacts created due to the lack of financial viability of the 710 project. The "scoping" needs detailed financial analysis to enable the process to "flag" all environmental issues in each alternative. Without cost and financial analysis the various alternatives cannot be analyzed during "scoping" to balance the costs and benefits of each alternative project.

Conclusion:
The Metro Scoping Process is Illegal and Dishonest

Based on the possible reliance on defective, incomplete, and outdated analysis in the 1993 Caltrans surface route EIR/EIS, and the lack of any financial analysis, Metro's Route 710 "scoping" process could violate both CEQA and NEPA. Metro must not undertake the "scoping" until the process of "scoping" is legally compliant. Otherwise "scoping" would be illegal and possibly violate the 1999 federal court injunction. All errors identified in the injunction must be corrected as part of Metro's "scoping" process.

Sincerely,

Joanne Nuckols

Claire W. Bogaard

1339 El Vago St.
La Cañada Flintridge, CA 91011
April 13, 2011

RECEIVED 4/20/11

Ron Kosinski
Deputy Director
Division of Environmental Planning
Caltrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

RE: SR-710 Environmental Impact Report/Scoping

Dear Mr. Kosinski:

As a resident of La Cañada Flintridge, a member of the No 710 Action Committee and someone who has followed the proposed connection of the 710 Freeway to the 210 Freeway, I wish to submit these comments and items for inclusion in the Scoping Report for the EIR/EIS on this project.

Stated Purpose and Need

Caltrans needs to prove that the project will fulfill the stated purpose and need.

The stated purpose and need for a connection of the 710 Freeway to the 210 Freeway has been consistent over the many decades since it was conceived. According to the Draft Environmental Impact Statements (EIS) and supplements from 1974 through 1986 (See 1, 2, 3, 4), the stated purpose for connecting the 710 and 210 Freeways is to improve the existing transportation system by reducing congestion on local city streets and to reduce stop and go driving, thereby reducing emissions and to reduce travel time through the corridor. The need for "closing the gap" was stated to be relief of traffic congestion caused by both trucks and automobiles in the Cities of Alhambra, Los Angeles, South Pasadena, and Pasadena. and to facilitate goods movement through the 710 corridor.

The 1986 third draft EIS supplement reported 1982 average daily traffic counts on major arterials in the corridor between the 710 Freeway terminus and the 210 Freeway and along Valley Blvd. These data demonstrate that the studied roadways were near capacity, confirming the obvious – these roadways were, and still are, congested.

In 2011, some 37 years following the 1974 Draft EIS, the proposed purpose and need statement remains much the same: improving regional mobility and the movement of people, goods and services; reducing congestion on arterials and local streets and reducing greenhouse gas emissions from mobile sources.

Reason dictates that if adding roadways relieves congestion, cities that invest heavily in building new roads, or expanding the capacity of existing ones, should benefit from less congestion, and lower costs associated with congestion, compared to cities that spend less on constructing additional capacity. In its 1998 report (See 5), the Surface Transportation Policy Project (STPP) sought to test this hypothesis by analyzing 15 years (1982 – 1996) of data from the Texas Transportation Institute's (TTI) study of congestion in 70 U.S. metropolitan areas from 35 states. These 70 metropolitan areas were first ranked based on their growth in lane capacity and then divided into half – a "high growth" group in which the metro areas increased lane capacity by an average of 47%, and a "low-growth" group in which average growth was only 22%.

Four conventional transportation indicators were calculated from the data: congestion cost per capita, excess fuel used per capita, delay per capita and roadway congestion index. The two groups showed no significant difference in congestion cost per capita, no difference in excess fuel per capita and delay per capita did not differ.

The two groups showed no significant difference in the mean roadway congestion index, a commonly-used parameter calculated from an area's daily volume of travel per lane of freeways and major streets. The "high growth" group spent $22 billion more than the "low growth" group and the bottom line is the "high growth" metropolitan areas did not achieve more congestion relief than the "low growth" areas (Figure 1).

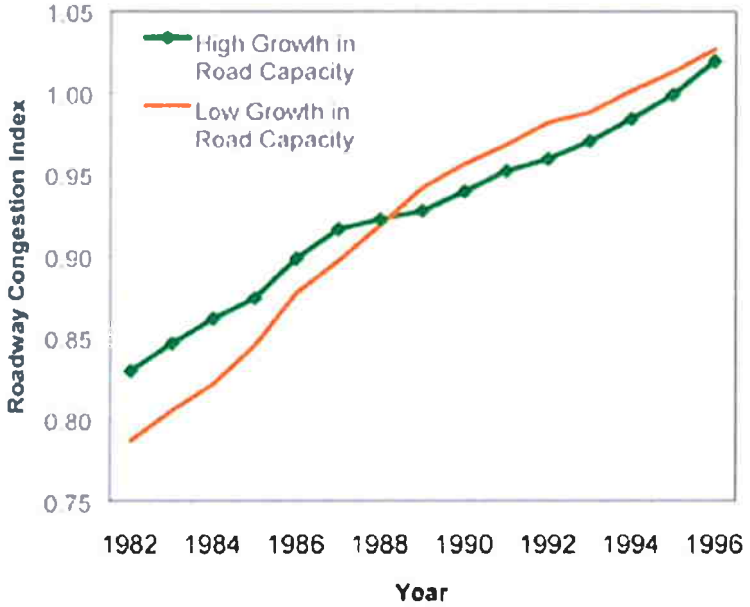

Figure 1.

The STPP study did not control for factors such as changes in population, shifting demographics, economic activity or changes in land use. However, the large size of the data set (70 metropolitan areas), geographic range (35 states from every region of the U.S.) and the long study period (15 years) make it likely that the relationships that emerged from the analysis are real and not biased by any of these factors.

There is substantial evidence that demonstrates that building new roads often increases congestion. When road capacity is expanded near congested routes, drivers who did not use that route previously are attracted to the new route to save time, resulting in an increase in the traffic volume in the new route. An analysis of 17 years of data from 30 urban California counties by U.C. Berkeley researchers (See 6) found that every 1% increase in new lane-miles generated a 0.9% increase in traffic in less than 5 years, effectively neutralizing the transient increase in capacity. A significant body of research demonstrates that new lanes fill with new traffic within a few years, particularly if surrounding routes are also congested (See 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25).

Glaringly absent from the current statements of purpose and need and the draft Environmental Impact Statements of the past is incontrovertible evidence that connecting the 710 Freeway to the 210 Freeway will achieve the stated purpose. Traffic counts alone cannot prove that adding more lanes – whether underground or above ground – will remove vehicles from the impacted streets. We do not know how many of the vehicles counted in such studies originated from the 710 Freeway terminus and eventually enter the 210 Freeway. Many may have destinations that lie between the current terminus of the 710 Freeway and the 210 Freeway. Their travel will not be facilitated by a tunnel spanning the distance between the current 710 Freeway terminus and the 210 Freeway with no opportunity for exit between these points. These vehicles must continue to rely on surface streets to reach their destinations.

In order for Caltrans to demonstrate that any project through any zone would fulfill the stated purpose and need, Origin and Destination (O/D) Studies must be conducted to verify the need for the 710-210 connection. An O/D study answers questions about the major flows of traffic through an area or along a corridor. The study looks at where vehicles are coming from, where they are going, why people are traveling, when the trips occur, and what kinds of vehicles are traveling. Origin and destination travel information is critical to clearly understand the magnitude of the transportation issues, assess the ability of the current transportation system to meet demands and identify projects and programs to address this demand.

O/D studies should be conducted over a wide geographic range, covering all possible zones, with the current 710 terminus as the "origin". The sampling strategy needs to be comprehensive, providing data from different times of the day and night, during all days of the week and all times of the year. It needs to include not only passenger vehicles, but also tractor-trailers. The following information can be collected from each respondent who participates:

- Closest cross streets to the origin
- Closest cross streets to the destination
- Exact entrance ramp
- Exact exit ramp
- Trip purpose
- Frequency of trip making
- Trip length
- Vehicle occupancy
- Socio-demographic characteristics

Without O/D studies, the statement that connecting the 710 and 210 Freeways is necessary to relieve congestion is merely conjecture.

Expansion of the Project Study Area

Caltrans claims to solve regional traffic issues with the proposed project, but the current study area is limited and does not include all potentially impacted communities.

The study area as currently delineated is inadequate to accurately assess the environmental impacts of any and all alternative projects on the region. The study area as currently defined appears to have been drawn from the map of the five zones under consideration for tunnel construction as presented to the public during the Tunnel Geotechnical Feasibility Study, casting doubt on the sincerity of Caltrans' claims to consider any and all alternatives to a tunnel project.

For example, the City of La Cañada Flintridge is not included in the current study area, nor is the 210 corridor between La Cañada Flintridge and the intersection of the 210 and 5 Freeways. If the 710 Freeway is extended to the 210 Freeway, this corridor will definitely feel the influence. The City of La Cañada Flintridge has reviewed the Draft Final Report for the I-710 Missing Link Truck Study prepared by Iteris dated May 2009. Although Caltrans and Metro like to discredit any reference to this study on the grounds that it was "only a draft and never finalized", the citation of this report in Metro's PPP confers legitimacy to its use. Highlights of the La Cañada analysis of the 2009 Iteris "Missing Link Truck Study" are summarized below.

The Study confirms that in every comparison, the tunnel project would cause SIGNIFICANT detrimental traffic and truck impacts on the segment of the I-210 Freeway through the cities of La Cañada Flintridge, Glendale, Pasadena, and the community of La Crescenta. A comparison of 2030 values with and without the tunnel project concludes:

- More than 25% increase in daily volume on I-210
- Additional 30,000 vehicles per day on I-210
- Additional 2,500 trucks per day on I-210
- 850 additional trucks per PM PEAK HOUR on I-210
- Truck percentages on I-210 increase from 11% to over 20%
- Higher truck volumes on Foothill Boulevard (almost no current truck volumes)
- Before-no freeway segments through City over capacity, after-most northbound
- segments over capacity
- I-210 freeway segments through city will operate over capacity (Level-of-Service F)
- and consequently force traffic onto local streets
- Foothill Boulevard will operate over capacity near Angeles Crest Highway

Amazingly, the Study's summary findings conclude that the tunnel connection would make overall driving conditions worse. The number of vehicle miles traveled would INCREASE in the peak hour with an I-710 connection, which would bring a host of unintended environmental impacts. Even more astounding is that the number of vehicle hours would INCREASE as well, which translates to more hours of delay, gas consumption and air pollution. The system-wide benefit would be a small increase in overall average speed of 0.6 miles per hour. Regionally, the substandard traffic conditions that exist would not be improved if the tunnel was built and additionally, those substandard conditions would be introduced into areas that would otherwise, without the tunnel, have standard or better conditions.

The negative impact of a connection of the 710 and 210 Freeways on this corridor cannot be denied. It is reasonable to conclude that similar impacts can be expected for any alignment of a project and that the method of connection – tunnel or otherwise – is irrelevant to the negative outcome for affected communities. By Caltrans' and Metro's own admission, the transportation problems this project is purported to remedy are REGIONAL. The study area must be expanded to reflect the entire impacted region or the conclusions will be invalid.

Diversion of Traffic to City and Residential Streets to Avoid Tolls

Building new roadways for freight transport does not guarantee truckers will use them.

Diversion of traffic from a toll road onto city or residential streets for purposes of toll avoidance is a great concern to all communities adjacent to any project built in the region. A growing number of reports show that tolled roadways can actually increase the traffic on adjacent arterials as drivers seek to avoid paying tolls (See 26, 27, 28, 29).

At THE Impact Project Trade, Health, Environment Conference in 2010, Australian Martin Wurt, Secretary of the Maribyrnong (Melbourne, Australia) Truck Action Group, reported on the increase in truck usage of residential streets since the construction of the Ring Roadway which was intended to funnel trucks to the Princes Freeway, over the Westgate Bridge, and then onto Bolte Bridge to the Port of Melbourne. However, this transportation plan has failed miserably since truck drivers are doing everything in their power to avoid the toll on Bolte Bridge. As a result, 20,000 heavy trucks a day currently use residential streets in Maribyrnong as thoroughfares. On some streets, as many as 8,000 heavy trucks a day pass homes, schools and hospitals. As a result, 36% of Maribyrnong's residents suffer from asthma. This is triple the Australian national average. Fifty-five percent of residents from affected streets reported ongoing sleep disturbance at night from truck traffic. Seventy-six percent felt constant apprehension at having to use the roads due to the truck traffic, and 62% reported that they no longer spent time in their yards due to exhaust fumes and noise.

States are increasing the use of toll roads with the intent of expanding capacity. A Government Accountability Office 2006 report estimated that 30 – 40% of new capacity is in the form of toll roadways (30, 31). Decreases in gas tax revenues and increased construction costs have led transportation agencies to resort to tolling for financing the cost of new construction. However, as discussed by Zhou *et. al.* (32), just because there is a need for alternative revenue resources , and thus an increase in construction of tolled roadways, it does not mean that these tolled roadways will be successful. A high percentage of new toll roads constructed have failed to attract the

traffic, and therefore the revenue, that they expected (33). The trucking industry has a low profit margin and is highly competitive, therefore many truckers are reluctant to use toll roads. As a result, truckers search for the minimum cost method and often avoid toll roads(34).

Caltrans must include in its EIR/EIS studies of toll tolerance/avoidance on the part of passenger vehicles as well as freight trucks. How much are passenger cars willing to pay? How many commuters would use the route and pay the toll twice a day? How much will trucking companies pay? At what toll level will these vehicles cease to use the supplied roadway and divert their trips through adjacent city and residential streets? What incentives will be effective in getting truckers to use a tolled roadway and keeping them on the tolled roadway? These questions must be studied and answered for all projects in all zones.

Attending School in the 210 Freeway Pollution Corridor

Children are getting more than an education while in the classroom.

A minimum of 30 schools are located within 1,000 feet of the 210 Freeway between the eastern border of La Cañada Flintridge and the intersection of the 210 and 5 Freeways (See Figures 2a and 2b). Over 10,000 students spend up to eight hours a day in the classrooms of these schools. Many of these same students spend several additional hours each day outdoors participating in Physical Education classes and/or sports practices.

Childhood asthma has long been linked to freeway pollution, but the damage doesn't stop with asthma. Pollution from auto and diesel emissions has also been linked to cancer, accelerated progression of atherosclerosis, impacts on fetal development and chronic inflammation of the central nervous system (Refer to the Health and Pollution submission from the No 710 Action Committee for a comprehensive list of documentation).

The children in this section of the 210 Freeway pollution corridor are already subjected to dangerous levels of traffic-related pollution. Currently, truck traffic makes up 11% of traffic on the 210 Freeway. An analysis of the SCAG so-called "Missing Link" Study done by the City of La Cañada Flintridge has shown that if the 710 Freeway is connected to the 210 Freeway, an additional 2,500 trucks per day will pass through this corridor – an increase of 25% -- and trucks will make up over 20% of the traffic on the 210 Freeway.

Below you will find a table listing thirty schools from this corridor that lie within 1,000 feet of the 210 Freeway. "Hot spot analysis" for these locations as well as all schools similarly related to all the routes under consideration for the proposed 710 tunnel project must be conducted. These listed locations should be designated as "sensitive receptor community sites." The hot spot analysis should seek peak values for all measurements so as not to underestimate the effect on human health. These studies must sample air quality at hourly intervals including PM 0.1, PM2.5, and PM10 throughout the twenty-four hours of given days to yield an accurate description of true exposure. In addition, seasonal studies are required to adequately assess the impact of seasonal climatologic conditions..

The Hot Spot analysis and modeling analysis should include harmful products e.g.,:

- Particulate matter PM to include all sized particles including ultrafine particles (<100nm) and nano particles (<50 nm), carbon black (organic carbon and elemental carbon), and degradation of road products and tires and brake linings and diesel catalyst decay products (including, but not limited to, metal particulate emissions, strontium, and a variety of organic compounds)
- Nitrogen oxides (NOx) and nitrogen dioxide (NO_2)
- Ozone
- Carbon monoxide (CO)

Health Impact Assessments and Health Risk Assessments are necessary at all school sites meeting the same criterion of 1,000 feet proximity to the project in all zones under consideration.

In addition to schools named below, identical Hot Spot Analysis, Health Impact Assessments and Health Risk Assessments are necessary for:

Verdugo Hills Hospital
1812 Verdugo Blvd.
Glendale, CA 91208

Verdugo Hills Hospital is located at the intersection of the 210 and 2 Freeways. The patients and employees would be adversely affected by any project that results in additional traffic—and therefore exhaust -- on the 210 Freeway. The same Health Impact Assessments and Health Risk Assessments are necessary at all hospital and other health care facilities meeting the same criterion of proximity to the project in all zones under consideration.

Schools Positioned within 1,000 feet of the 210 Freeway between La Cañada Flintridge and the Intersection with the 5 Freeway

La Canada Elementary School	4540 Encinas Dr., La Cañada, CA 91011
La Canada High School	4463 Oak Grove Dr., La Cañada, CA 91011
Hillside School & Learning Center	4331 Oak Grove Dr., La Cañada, CA 9101
Flintridge Preparatory School	4543 Crown Ave., La Cañada, CA 91011
St. Francis High School	200 Foothill Blvd., La Cañada, CA 91011
St. Bede The Venerable	4524 Crown Ave., La Cañada, CA 91011
Learning Castle	4490 Cornishon Ave., La Cañada, CA 91011
La Canada Preparatory School	4490 Cornishon Ave., La Cañada, CA 91011
Crestview Preparatory School	140 Foothill Blvd., La Cañada, CA 91011
Pinewood Academy	4490 Cornishon Ave, La Cañada CA 91011
Renaissance Academy	4490 Cornishon Ave., La Cañada, CA 91011
Foothill Progressive Montessori	4526 Indianola Way, La Cañada, CA 91011
Hogg's Hollow Preschool	4490 Cornishon Ave., La Cañada, CA 91011
Child Educational Center	140 Foothill Blvd., La Cañada, CA 91011
Crescenta-Canada Coop Nursery School	1700 Foothill Blvd., La Cañada, CA 91011
La Canada Community Center Preschool	4469 Chevy Chase Dr., La Cañada, CA 91011
Flintridge Montessori	1739 Foothill Blvd., La Cañada, CA 91011
La Canada Preschool	4460 Oakwood Ave., La Cañada, CA 91011
St. George's Preschool	808 Foothill Blvd., La Cañada, CA 91011
Lighted Window Preschool	1200 Foothill Blvd., La Cañada, CA 91011
Parents & Children's Nursery School	4603 Indianola Way, La Cañada, CA 91011
Foothills School	4490 Cornishon Ave., La Cañada, CA 91011
Crescenta Valley High School	2900 Community Ave., La Crescenta, CA 91214
Holy Redeemer Catholic School	2361 Del Mar Rd., Montrose, CA 91020
La Crescenta Elementary School	4343 La Crescenta Blvd., La Crescenta, CA 91214
La Crescenta Christian School	3013 Montrose Ave., La Crescenta, CA, 91214
Lincoln Avenue School	4310 New York Ave., La Crescenta, CA 91214
Delphi Academy	11341 Brainard Ave, Lake View Terrace, CA, 91342
Crescenta Valley Adventist School	6245 Honolulu Avenue, La Crescenta 91214
Crescenta Valley Christian Academy	9100 Tujunga Canyon, Tujunga, CA 91042

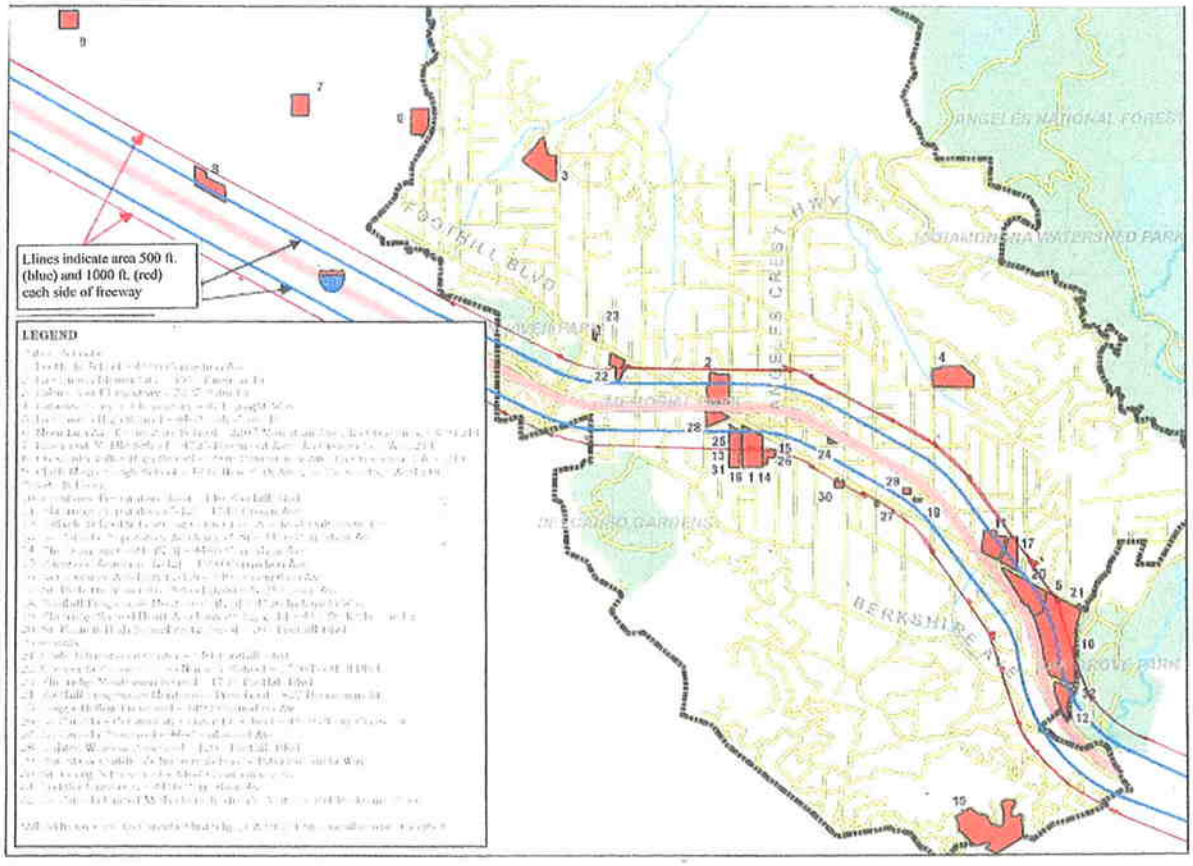

Figure 2a.

Schools in La Cañada Flintridge (Map courtesy of the City of La Cañada Flintridge).

Only those within 1,000 feet of the 210 Freeway (within the red lines paralleling the freeway) are included in the table above

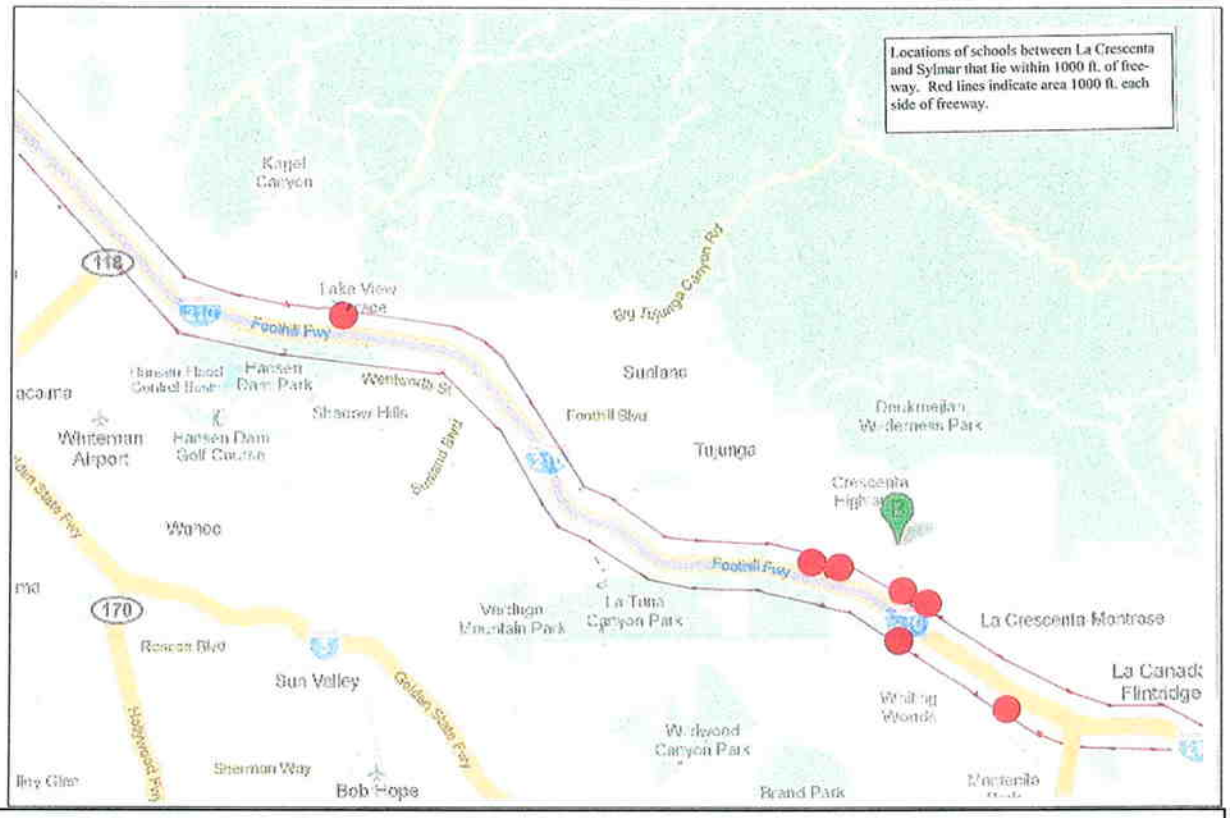

Figure 2b.
Schools between La Cañada Flintridge and the intersection of the 210 and 5 Freeways that lie within 1,000 feet of the 210 Freeway (within red lines paralleling the 201 Freeway).

I look forward to reading the Scoping Report, when issued, and expect to see the issues raised by myself and others included. Ultimately, I hope that Caltrans and Metro will be convinced that there are better, fiscally and environmentally responsible methods to improve regional automobile traffic and to move freight from the Ports of Los Angeles and Long Beach – methods that would result in a win-win outcome for all involved. If not, these agencies can expect continue opposition from the citizens of the region who understand now, more than ever, the importance of protecting our communities from the fallout from irresponsible planning.

Sincerely,

Janice SooHoo

Member, No 710 Action Committee

OPPOSITION GROUPS (PARTIAL LIST)
Natural Resources Defense Council
Glassell Park Improvement Association, Land Use Committee
Far North Glendale Homeowners Association
Town Council of Crescenta Valley
Glendale Homeowners Coordinating Council
LA RED, El Sereno
Green Scissors 2010 Report Groups
Friends of the Earth
Taxpayers for Common Sense
Environment America
Public Citizen

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

LOS ANGELES NEIGHBORHOOD COUNCILS
Arroyo Seco
Cypress Park
Eagle Rock
El Sereno
Glassell Park
Highland Park
Lincoln Heights

CITIES
City of Glendale
City of Los Angeles
City of La Canada Flintridge
City of South Pasadena

Post Office Box 51124,
Pasadena,
California 91115
626 799.0044

RECEIVED 4/14/11

NO 710 ACTION COMMITTEE:

SCOPING COMMENTS ON HEALTH AND AIR POLLUTION 710 TUNNELS PROJECT

Ron Kosinski
Deputy Director
Division of Environmental Planning
Caltrans District 7
100 S. Main street, MS 16A
Los Angeles, Ca 90012
Dear Mr. Kosinski,

RE: SR-710 Environmental Impact Report/ Scoping Request.

We are requesting a "hot spot analysis" for the following types of locations related to all the corridors under consideration for the proposed 710 tunnels project:

- Schools
- Daycare center
- Hospitals
- Convalescent centers
- Senior centers
- Parks and recreation centers and athletic fields
- Residential areas

These listed locations should be designated as "sensitive receptor community sites."

The Hot Spot analysis and modeling analysis should include harmful products e.g.,:

- Particulate matter PM to include all sized particles including ultrafine particles (<100nm) and nano particles (<50 nm), carbon black (organic carbon and elemental carbon), and degradation of road products and tires and brake linings and diesel catalyst decay products (including but not limited to metal particulate emissions, strontium, and a variety of organic compounds)

- Nitrogen oxides (NOx) and nitrogen dioxide (NO_2)
- Ozone
- Carbon monoxide (CO)

We are also requesting "Health Impact Assessments and Health Risk Assessments" at the above named sites.

In addition to the specified sensitive receptor community sites, the hot spot analysis should also include analyses of the **tunnels themselves** with investigation of concentrations of all the above pollutants at peak traffic hours with congestion modeling, within the tunnels, at the portals and at ventilation shafts. Information about the ventilation shaft air cleaning should be provided consistent with the highest level of available technology and its cost. The modeling should include port truck traffic and be based on the current percentage of fossil fuel dependent vehicles. Time in tunnel at congestion speeds should be modeled for individuals who use the tunnel for regular commuting. Models should be created to look at what might happen at community sites if the traffic chooses to use the surface streets instead of the toll tunnel, which has been seen at various sites around the world.

The hot spot analysis should seek **peak** values for all measurements so as not to underestimate the effect on human health. The impact of various temperatures and day and night changes and local wind patterns should be included in model analyses.

Discussion:

Air pollution in our region is significantly influenced by fossil fuel emissions from transportation. Human health is significantly impacted by the air pollutants produced by fossil fuel combustion regionally and locally. Key pollutants that are recognized as having adverse health effects include particulate matter (PM) of various sizes with increasing concerns about ultrafine particles and carbon black, ozone (O_3), Nitrous Oxide (NOX), and Nitrogen Dioxide (NO_2) as well as acid and organic vapors.

Health studies of air traffic pollution have shown an association with increased cancer risk, increased cardiovascular events and death, and lung inflammation with worsening of asthma and lung function.

Children are particularly sensitive to regional and local air pollution, leading to permanently decreased lung function and increased incidence of or worsening of asthma.

> Children in more polluted communities are almost 5 times as likely to have clinically abnormally lung function compared to those in less polluted communities. As alarming as this is, the greatest effect of pollution-related deficits may occur later in life, since reduced lung function is a strong risk factor for complications and death during adulthood.(NEJM Sept 9, 2004 vol 351: 1057-67 Gauderman)

Inability to get enough exercise because of poor air quality and asthma attacks can impair quality of life, and increase the risk of obesity and associated health problems. Later, societal health care costs could be significantly adversely impacted.

Proximity to a freeway or busy roadway increases many health risks. Wind can be a factor how far the pollution is distributed, up to 1.5 miles in some scientific literature.

Diesel emissions, predominantly from trucks, are major contributors to air pollution. Proximity to truck diesel traffic increases health risks. Diesel particulate emissions are labeled as cancer causing toxic air contaminants. The particles may penetrate deeply into lung and vascular tissues and stay there for a long time. Diesel particulate is responsible for 70% of total cancer risk from all toxic air pollution according to AQMD. Diesel gaseous compounds are also hazardous.

We are very concerned about the project proposal and the health impacts of increased truck and other highway traffic in our neighborhoods. We want livable, healthy neighborhoods, not more freeways.

No 710 ACTION COMMITTEE MEMBERS SUPPORTING THIS REQUEST:

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MARY ANN PARADA	1710 RAMONA AVE SOUTH PASADENA, CA 91030	4/2/11	maryanparada@cox.net

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Sharon Lilly	659 Oleander Dr LA 90042	4/11/11	salilly@earthlink.net

Attachments:

Appendix A: Bibliography of Health/Pollution Impacts links

Appendix B: Outline of Health Concerns for 710 Tunnels Scoping

Appendix C:
http://t4america.org/docs/blueprint_summary.pdf
Page 7, National Transportation Objectives and Targets

http://departments.oxy.edu/uepi/Global%20Trade%20Executive%20Summary.pdf
Page 4, Chart on Selected Health and Economic Impacts of Freight in
Global Trade Impacts: Addressing the Health, Social and Environmental Consequences.....

http://coalitionforcleanair.org/air-pollution-pollutant.html
http://coalitionforcleanair.org/air-pollution-10facts.html
http://coalitionforcleanair.org/our-programs-transportation-facts.html

APPENDIX A

Attached please find an extensive bibliography of health effects from traffic pollution that the community has collected. We have sorted them into a number of different categories for ease of use with their active links. The EIR should actively study ALL these health concerns and weigh them against the various transportation benefits. The externalities of health impacts of certain projects may significantly diminish any transportation benefits, making certain alternatives **unacceptable**. Community health and cohesiveness is of critical importance to those in the path of the proposed tunnel. We are demanding a balanced look at the issues, that will stand up to scientific scrutiny and evolving health and transportation policies. Mitigation of health effects can be difficult, prohibitively expensive, or inadequate so we want honest and full disclosure. We are asking for SMART GROWTH and MOBILITY MANAGEMENT. We know the old solutions are not safe and sustainable.

Health and Pollution Impact

Official statements from various organizations

http://acta.org/projects/tech studies/Health_Risk_Assessment.pdf
HRA prepared for the Heim Br./SR-47 project

http://www.aqmd.gov/ceqa/igr/2009/February/feb09.html
February 2009 Comment Letters Draft Environmental Impact Reports
The following letters were written (date sent in parentheses) by the AQMD commenting on the air quality analysis. PDF files require the use of a reader.

http://www.aqmd.gov/ceqa/igr/2009/February/EISEIRI-710.pdf
"Protocol for the Air Quality and Health Risk Assessments (AQ/HRA) for the I-710 Corridor Environmental Impact Report"
Environmental Impact Statement (EIR/EIS) South Coast Air Quality Management District FEBRUARY 22. 2009

http://www.greenenvironmentnews.com/feed_images/2b08292e-7379-4373-9ba8-0f2324b4f956.pdf
Hearing on "Air Pollution Challenges for California's Inland Empire" United States Senate Committee on Environment and Public Works
Senator Barbara Boxer, Chairman Wednesday, October 10, 2007: San Bernardino CA
"Air Pollution and Health" - testimony by: W. James Gauderman, Ph.D. Keck School of Medicine

http://www.ictf-jpa.org/publiccomment/Letters/NaturalResourcesDefenseCouncil-022609.pdf
Re: Notice of Preparation / Initial Study - ICTF Project
Natural Resources Defense Council American Lung Association In California Coalition For A Safe Environment Coalition For Clean Air Communities For Clean Ports East Yard Communities For Environmental Justice Harbor Watts Edc Long Beach Alliance For Children With Asthma San Pedro And Peninsula Homeowner's Coalition February 25, 2009
Re: 1-710 Project EIR Alternatives
Barry R. Wallerstein D.Env. South Coast, Air Quality Management District, February 17,2009, Pgs 9-14

http://hydra.usc.edu/scehsc/web/Resources/Reports%20and%20Publications/THE%20Impact%20Project%20Report%20-%20June%202009%20FINAL.pdf
THE Impact Project Trade, Health, Environment Making the Case for Change
THE Impact Project June 2009

Air Pollutants from traffic

http://www.arb.ca.gov/research/health/healthup/march07.pdf
Health Effects Associated With Traffic-Related Air Pollution
Air Resources Board California Environmental Protection Agency, March 22, 2007

http://eprints.qut.edu.au/27536/
On-road ultrafine particle concentration in the M5 East road tunnel, Sydney, Australia
Knibbs, Luke D., deDear, Richard, Mengersen, Kerrie, & Morawska, Lidia (2009) On-road ultrafine particle concentration in the M5 East road tunnel, Sydney, Australia. *Atmospheric Environment*, *43*(22-23), pp. 3510-3519.

http://pubs.acs.org/doi/abs/10.1021/es062590s?prevSearch=freeway%2Bpollution&searchHistoryKey=
Particle Concentration and Characteristics near a Major Freeway with Heavy-Duty Diesel Traffic
Leonidas Ntziachristos, Zhi Ning, Michael D. Geller, and Constantinos Sioutas*
Department of Civil and Environmental Engineering, University of Southern California, Los Angeles, California 90089
Environ. Sci. Technol., 2007, *41* (7), pp 2223-2230 DOI: 10.1021/es062590s Publication Date (Web): February 23, 2007
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http://cfpub.epa.gov/ncer_abstracts/index.cfm/fuseaction/display.abstractDetail/abstract/8977/report/0
Near Roadways Exposure to Urban Air Pollutants Study (NEXUS)
Investigators: Batterman, Stuart A. , Dion, F , Lewis, T , Mukherjee, Bhramar , Robins, Thomas, Institution: University of Michigan - Ann Arbor, EPA Project Officer: Stacey Katz/Gail Robarge,, Project Period: September 1, 2008 through August 31, 2011

http://www.chaseireland.org/Documents/WHO PM factsheet.pdf
Particulate matter air pollution: how it harms health
World Health Organization Fact sheet EURO/04/05 Berlin, Copenhagen, Rome, 14 April 2005

http://pubs.acs.org/doi/pdf/10.1021/es00046a019
http://www.mendeley.com/research/sources-fine-organic-aerosol-3-road-dust-tire-debris-organometallic-brake-lining-dust-roads-sources-sinks/
Sources of fine organic aerosol. 3. Road dust, tire debris, and organometallic brake lining dust: roads as sources and sinks
Wolfgang F. Rogge, Lynn M. Hildemann, Monica A. Mazurek, Glen R. Cass, Bernd R. T. Simoneit, Environ. Sci. Technol., 1993, 27 (9), pp 1892-1904, DOI: 10.1021/es00046a019, Publication Date: September 1993

http://pubs.acs.org/doi/abs/10.1021/es070198o
Metal Emissions from Brake Linings and Tires: Case Studies of Stockholm, Sweden 1995/1998 and 2005
David S. T. Hjortenkrans,* Bo G. Bergbäck, and Agneta V. Häggerud, School of Pure and Applied Natural Sciences, University of Kalmar, Sweden, Environ. Sci. Technol., 2007, 41 (15), pp 5224-5230, DOI: 10.1021/es070198o, Publication Date (Web): June 22, 2007, Copyright © 2007 American Chemical Society

http://pubs.acs.org/doi/full/10.1021/es0618797?prevSearch=freeway%2Bpollution&searchHistoryKey=
In-Cabin Commuter Exposure to Ultrafine Particles on Los Angeles Freeways
Yifang Zhu, Arantzazu Eiguren-Fernandez, William C. Hinds, and Antonio H. Miguel*, Department of Environmental Engineering, Texas A&M University-Kingsville *Environ. Sci. Technol.*, 2007, *41* (7), pp 2138-2145 DOI: 10.1021/es0618797 Publication Date (Web): February 27, 2007 Copyright © 2007 American Chemical Society

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Air Pollution May Be Associated With Blood Clots In Deep Leg Veins
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Higher Blood Pressure Found in People Living in Urban Areas
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Rats On A Road Trip Reveal Pollution-Heart Disease Risk
Rats that rode in a truck on the New York State Thruway between Rochester and Buffalo and were exposed to the same highway pollution that motorists encounter, showed a drop in heart rate and effects on the autonomic nervous system, according to a study published this month in the journal Inhalation Toxicology.
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Air Pollutants Linked Blood Clotting In Mice, Mechanism Identified
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Air Pollution Impact on Seniors

http://www.sciencedaily.com/releases/2009/12/091223074703.htm
Air Pollution Linked to Hospitalizations for Pneumonia in Seniors
ScienceDaily, materials provided by McMaster University, *(Dec. 23, 2009)*

http://www.sciencedaily.com/releases/2006/03/060309081531.htm
Elderly Have Higher Risk For Cardiovascular, Respiratory Disease
ScienceDaily, materials provided by NIH/National Institute of Environmental Health Sciences, *(Mar. 9, 2006)*

http://www.sciencedaily.com/releases/2009/08/090831213225.htm
Carbon Monoxide Linked To Heart Problems In Elderly
ScienceDaily, materials provided by Yale University, *(Sep. 1, 2009)*

Air Pollution is associated with death in people with other diseases

http://www.sciencedaily.com/releases/2006/05/060523000408.htm
Air Pollution Increases Death Risk In People With Certain Diseases
ScienceDaily, materials provided by American Thoracic Society, *(May 22, 2006)*

http://www.sciencedaily.com/releases/2008/04/080414193025.htm
Excess Pneumonia Deaths Linked To Engine Exhaust, Study Suggests
ScienceDaily, materials provided by BMJ-British Medical Journal, *(Apr. 16, 2008)*

Economic Costs and Externalities

http://blogs.edf.org/transportation/2010/03/01/we-gotta-clean-up-freight-transportation%E2%80%99s-hidden-cost-to-health-and-the-planet/
We Gotta Clean Up: Freight Transportation's Hidden Cost to Health and the Planet
EDF March 1, 2010 | Posted by Transportation Team *This post was co-authored by Camille Kustin*

http://www.arb.ca.gov/planning/gmerp/plan/appendix_a.pdf
Appendix A - Quantification of the Health Impacts and Economic Valuation of Air Pollution from Ports and Goods Movement in California (PDF) 111 pages
State of California California Environmental Protection Agency Air Resources Board arb Emission Reduction Plan for Ports and Goods Movement in California http://www.arb.ca.gov/planning/gmerp/plan/final_plan.pdf
Final Emission Reduction Plan for Ports and Goods Movement (approved April 20, 2006) March 21, 2006

Asthma and Pollution

http://hydra.usc.edu/scehsc/web/Resources/Reports and Publications/Call to Action revised 4-06.pdf
Controlling Asthma in Los Angeles County: A Call to Action
Approved and adopted by the Asthma Coalition of Los Angeles County on 4/10/06

http://www.sciencedaily.com/releases/2006/10/061017084420.htm
Asthma Linked To Soot From Diesel Trucks In Bronx
ScienceDaily, materials provided by New York University Medical Center and School of Medicine, (Oct. 30, 2006)

http://www.sciencedaily.com/releases/2007/08/070820194635.htm
Exhaust Fumes And Genetic Predisposition Increase Childhood Asthma Risk
ScienceDaily, materials provided by University of Southern California, *(Aug. 23, 2007)*

http://www.sciencedaily.com/releases/2006/05/060502174350.htm
Children Living Near Major Roads Face Higher Asthma Risk
ScienceDaily, materials provided by University of Southern California, *(May 2, 2006)*

http://www.sciencedaily.com/releases/2005/09/050921082651.htm
Researchers Link Childhood Asthma To Exposure To Traffic-Related Pollution
ScienceDaily, materials provided by University of Southern California, *(Sep. 21, 2005)*

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Big Air Pollution Impacts On Local Communities: Traffic Corridors Major Contributors To Illness From Childhood Asthma
ScienceDaily, materials provided by University of Southern California, *(Nov. 5, 2009)*

http://www.sciencedaily.com/releases/2010/04/100409142431.htm
Traffic-Related Pollution Near Schools Linked to Development of Asthma in Pupils, Study Suggests
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Ozone and Traffic Pollution Increase Asthma-Related Hospitalizations in Children
ScienceDaily, materials provided by American Thoracic Society, *(Apr. 27, 2010)*

Long Term health effects

http://www.laweekly.com/content/printVersion/872818/
Black Lung Lofts
Many children being raised in L.A.'s hip, new freeway-adjacent housing are damaged for life, By Patrick Range McDonald, LA Weekly, published: March 06, 2010

http://www.sciencedaily.com/releases/2007/07/070731085554.htm
Air Pollution Linked To Early Death
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Infant Inhalation Of Ultrafine Air Pollution Linked To Adult Lung Disease
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DNA Damage

http://www.sciencedaily.com/releases/2009/05/090517143218.htm
Environmental Exposure To Particulates May Damage DNA In As Few As Three Days
ScienceDaily, materials provided by American Thoracic Society, *(May 18, 2009)*

Misc Health Effects Due to Diesel Exhaust

http://www.sciencedaily.com/releases/2008/03/080311075339.htm
Diesel Exhaust Inhalation Stresses Your Brain
even a short exposure to the fumes can affect your brain. A study published in the open access journal Particle and Fibre Toxicology reveals that an hour of sniffing exhaust induces a stress response in the brain's activity.
ScienceDaily, materials provided by BioMed Central/Particle and Fibre Toxicology, *(Mar. 13, 2008)*

http://www.sciencedaily.com/releases/2010/03/100323105943.htm
Diesel Exhaust Associated With Lethargy in Offspring
Breathing diesel exhaust during pregnancy is associated with sluggishness in offspring.
ScienceDaily, materials provided by BioMed Central, *(Mar. 24, 2010*

http://www.sciencedaily.com/releases/2007/07/070730172804.htm
First Potential Biomarker For Human Exposure To Diesel Exhaust
ScienceDaily, materials provided by American Chemical Society, *(July 31, 2007)*

http://www.sciencedaily.com/releases/2007/09/070911092135.htm
Diesel Exhaust Kills Throat Cells, Study Shows
ScienceDaily, materials provided by Deakin University, *(Sep. 12, 2007)*

http://www.sciencedaily.com/releases/2008/06/080604114550.htm
Why Diesel Particulates Cause Cardiovascular Disease
ScienceDaily, materials provided by Umeå University, *(June 9, 2008)*

http://www.sciencedaily.com/releases/2009/03/090312205224.htm
Diesel exhaust causes arteries to lose their flexibility
Researchers found that exposure to engine pollution resulted in arterial stiffness in a group of healthy volunteers. Arterial stiffness plays an important role in hypertension and is an independent predictor of mortality."
ScienceDaily, materials provided by Particle and Fibre Toxicology, *(Mar. 19, 2009)*

http://www.sciencedaily.com/releases/2007/09/070912190002.htm
Diesel Exhaust May Increase Risk In Patients With Heart Disease
ScienceDaily, materials provided by University of Edinburgh, *(Sep. 14, 2007)*

http://www.sciencedaily.com/releases/2008/10/081006102537.htm
Air Pollution May Increase Risk Of Appendicitis
ScienceDaily, materials provided by American College of Gastroenterology, *(Oct. 7, 2008)*

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Air Pollution May Trigger Appendicitis
ScienceDaily, materials provided by Canadian Medical Association Journal, *(Oct. 6, 2009)*

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Diesel-Fueled Trucks Drive Up Air Pollution Exposure For Commuters
ScienceDaily, materials provided by University of Southern California, *(Nov. 1, 2007)*

Coccidioidomycosis and Construction

http://www.springerlink.com/content/j5528307123w31v3/
Coccidioidomycosis D. A. Bronnimann and J. N. Galgiani European Journal Of Clinical Microbiology & Infectious Diseases, May 1989, Volume 8, Number 5, 466-473, DOI: 10.1007/BF01964061 CURRENT TOPIC: REVIEW

http://www.medscape.com/viewarticle/473165
Emerging Infectious Diseases
Coccidioidomycosis Among Workers at an Archeological Site, Northeastern Utah
Lyle R. Petersen; Stacie L. Marshall; Christine Barton-Dickson; Rana A. Hajjeh; Mark D. Lindsley; David W. Warnock; Anil A. Panackal; Joseph B. Shaffer; Maryam B. Haddad; Frederick S. Fisher; David T. Dennis; Juliette Morgan Posted: 04/22/2004; Emerging Infectious Diseases. 2004;10(4) © 2004 Centers for Disease Control and Prevention (CDC)

http://arizonapublicrecordsearch.org/353/valley-fever-2/
Valley Fever
There is no doubt that construction companies contribute significantly to Valley Fever. According to the MayoClinic
By ADMIN, Arizona Public Record Search, on December 27, 2010

http://www.thefreelibrary.com/PROJECT+STIRS+FEARS+OF+VALLEY+FEVER%3b+RESIDENTS+SAY+CONSTRUCTION+MAY...-a083807257
Project Stirs Fears Of Valley Fever; Residents Say Construction May Spread Harmful Spores
Byline: Gloria Gonzales Daily News Staff Writer Copyright 1998 Daily News

APPENDIX B

OUTLINE of health concerns for 710 Tunnels Scoping

Tunnel Safety

Traffic accidents--specific dangers of a tunnel accident with fires

Major hazards : earthquakes, floods, terrorist attacks

What will be the typical time in tunnel with current congestion patterns?

Rescue and safety capability within the tunnel; escape routes; handicap escapes

Tunnel and Health

Monitor pollutants - tunnels concentrate pollutants:

Specify PM including ultrafine, carbon black,ozone, Nitrogen dioxide, NOS, yCO

Brake and tire lining emissions; tire rubber, fine organic aerosols

Temperature and seasonal impacts/day and nite impacts/ wind impacts on pollutants

What are the health effects in a tunnel with stopped traffic? Noise, pollution, psychological

HIA, HRA should cover the following tests and analyses:

Concentrations in proximity to portals and ventilation shafts

Concentrations at sensitive sites including schools, hospitals, residences

Effect on asthma

Effect on lung disease

Possible effect on diabetes, breast cancer

Neurotoxin effect on brain cancers and cognitive dysfunction

Cardiovascular —mortality, cardiovascular events, vascular inflammation, stroke, BP

Miscellaneous: appendicitis, pneumonia

Children:

lung development, asthma, autism, fetal brain development

Women:

Differential effect on women: lungs, premature births, fetal brain development, increased abortion rates

Continuum of effect—no threshold (important for mitigation)

Diesel specific health data

Duration of exposure with regular commuters

Comparison with smoking risk

Distance from freeway/tunnel/ventilation shafts modeling 500 fot up to 1.5 miles

Other health **externalities**: missed school, missed work, increased health expenses, increased stress/worry

Tunnel Construction

Workers safety

Dust displacement into air; coccidiomycoses

Disruption of underground water supplies

Tunnel finances

Cost estimates don't take into consideration **health externalities**

PPP responsibility to health and communities

Ultimately liability for health impact

Tunnel Impact on Quality of Life

Alignment with transportation needs and goals to make livable, equitable communities

Alignment with regional climate and air quality goals/guidelines/standards

Alignment with complete roads concepts

Impact on regional air quality

APPENDIX C

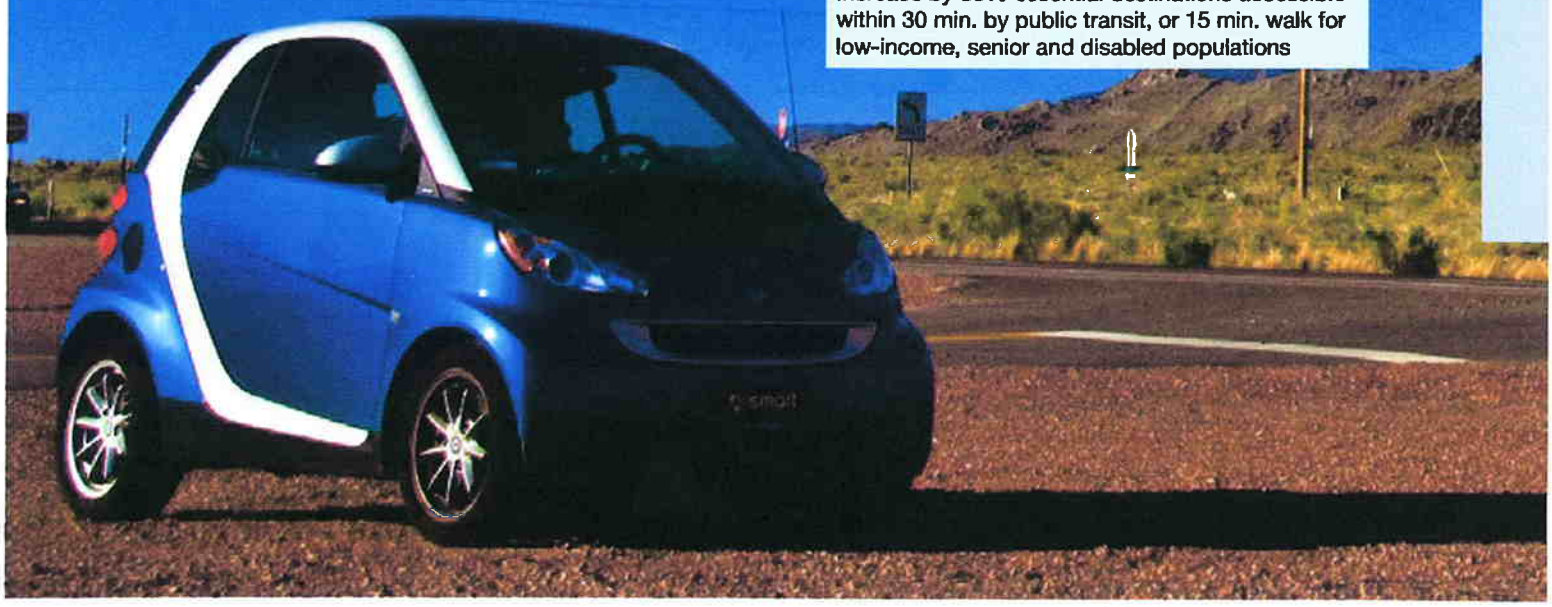
Selected Health, Economic & Community Impacts - Freight Transportation

	Hazard	Where it's found, who is at risk	Illness or condition that the long-term exposure or impact can cause
REGIONAL AIR POLLUTION	Particulate matter	Elevated levels of PM2.5 in the air	Cardiovascular disease, COPD (e.g., emphysema)
	PM and elemental carbon (EC)	In vehicle exhaust; EC is a marker for diesel	Chronic exposure leads to reduction lung function in children
	Ultrafine particles (UFPs)	In vehicle exhaust; considered very toxic	When lab animals breathe UFPs, some end up in the brain; UFPs can cause artery hardening in lab animals
	Nitrogen dioxide -- precursor to ozone	Diesel emissions contains high levels of NO_2	Increase in school absences is linked to increases in ozone levels
LIVING NEAR TRAFFIC-RELATED AIR POLLUTION	Living close to highways	Children	Increased asthma; exacerbation of asthma (e.g., wheezing) and use of more asthma medication
	Living or going to school near a busy road	Children	More likely to develop new cases of asthma
	Living near busy roads	Pregnant women	More likely to have premature or low birth weight babies or miscarriages, or develop preeclampsia
	Living near a freeway	Adults	Thickening of the artery walls that can lead to heart disease and stroke
	Living within 50 meters of a busy road with more than 15,000 vehicles/day	Women	More likely to develop mild cognitive decline as they age
	Living near busy roadways	Women	More likely to develop new cases of diabetes
	Living near busy roads	Men and women	More likely to develop stroke and new cases of heart disease
HIGH NOISE LEVELS	Community noise pollution	At risk: those living near busy highways, marine terminals, airports, rail yards, and train tracks, and/or construction of the above	Residents near airports and highways show (for adults) an increase in cardiovascular disease and stroke, sleep difficulties and anxiety; and (for children) problems with school behavior and anxiety
	Elevated levels of noise in workplaces	At risk: dock workers, railroad workers and truck drivers	Long term exposure can cause hearing loss, stress and high blood pressure
LABOR ISSUES; WORKER HEALTH AND SAFETY	Contingent employment - e.g., warehouse workers	Workers often hired by agencies as temporary workers with low-pay and no benefits	Stressful, insecure jobs without benefits
	Misclassification as independent contractors rather than employees	Port truck drivers	Lack of basic worker protections, such as hourly wage, overtime, health insurance, unemployment benefits, right to organize - and OSHA protections
	Diesel exhaust	Dock workers, railroad workers, truck drivers and workers at trucking operations	Increase in lung cancer in all three occupations; increase in COPD (e.g., emphysema) among railroad workers
	Heat	Lack of air conditioning in cabs of trucks and locomotives and inside huge distribution centers	If outdoor temperatures are extremely high and there is no relief or mitigation, workers can suffer from heat stress illnesses
	Injuries/fatalities	Some parts of the freight transportation industry are considered "high hazard"	E.g. The 2009-2010 California OSHA highest hazard industry list included warehousing and truck transportation
COMMUNITY IMPACTS	Industrial blight	Empty containers in lots near homes; views of industrial cranes	Decreases home values and quality of life
	Traffic Congestion	Cars must travel with big-rig trucks; expanding number of heavy duty trucks hauling containers; truck driving schools operating in neighborhoods	Stress from congestion; increased commuting time means longer times on the road breathing air pollution in exhaust from cars and trucks
	Cars traveling in same lanes and on same highways	Expanding number of heavy duty trucks hauling	Injuries and fatalities in car-truck accidents.
	24-hour lighting	Lights shine in windows	Difficulty sleeping at night
	Road repairs	Highways, truck routes, residential streets near rail yards, ports and warehouses	High cost to local and state taxpayers to repair the roads and highways from big-rig truck damage
	Eminent domain	Exerts the right of railroads or governments to appropriate private property (e.g., to build a highway)	Community residents can lose their homes

National Transportation Objectives & Targets

2010-2030

Objectives	Performance Targets
Improve Economic Competitiveness, Transportation System Efficiency and Workforce Development Opportunities	Reduce per capita vehicle miles traveled by 16%
Improve Transportation System Conditions and Connectivity	Triple walking, biking and public transportation usage
Promote Energy Efficiency and Achieve Energy Security	Reduce transportation-generated carbon dioxide levels by 40%
Ensure Environmental Protection, Restore Climate Stability and Resolve Persistent Environmental Justice Issues	Reduce delay per capita by 10%
Ensure Safety for All Transportation Users and Improve Public Health Outcomes	Increase proportion of freight transportation provided by railroad and intermodal services by 20%
Provide Equal and Equitable Access to Transportation Options in Urban, Suburban and Rural Communities	Achieve zero percent population exposure to at-risk levels of air pollution
	Improve public safety and lower congestion costs by reducing traffic crashes by 50%
	Increase share of major highways, regional transit fleets and facilities, and bicycling/pedestrian infrastructure in good state of condition by 20%
	Reduce average household combined housing + transportation costs 25% (use 2000 as base year)
	Increase by 50% essential destinations accessible within 30 min. by public transit, or 15 min. walk for low-income, senior and disabled populations



Our Work
Air Pollution Facts
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Take Action
Media Center
Reports
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Take Action! Go straight to the latest Action Alerts.

The Coalition for Clean Air is dedicated to restoring clean, healthful air to California by advocating responsible public policy, providing technical and educational expertise, and promoting broad-based community involvement.

Top 10 facts Californians should know about air pollution and health

1. Breathing air in polluted metropolitan areas such as Los Angeles or Riverside can reduce your life expectancy by 2 to 3 years.

2. Motor vehicles and other air pollution sources that move, such as ships, trucks, trains, buses and even lawnmowers, account for about 90% of the cancer risk in the greater-Los Angeles region – with stationary sources such as power plants and factories accounting for only about 10%.

3. Diesel exhaust from trucks, ships, trains and buses has been declared to contain over 40 substances listed as hazardous air pollutants by the U.S. EPA.

4. When you drive in bumper-to-bumper traffic, pollutants outside can seep into your car, making the air you breathe inside your car up to 10 times more polluted than typical city air.

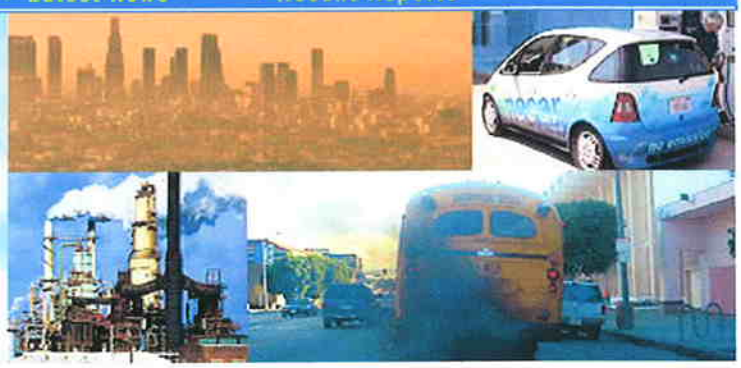
5. Every day that a ship sits at dock unloading its cargo, it releases an entire ton of smog-forming and toxic pollutants.

6. If you live, work or go to school near freeways, high-traffic roads, seaports, and rail yards, you are generally at greater risk for cancer and decreased lung function, studies show, because these places contain more concentrated levels of air pollution.

7. For your child, toxic air pollution is an even bigger problem, in part because children breathe much more quickly than adults.

8. Asthma is a leading cause of school absenteeism, according to the California Department of Education.

9. Even if you don't smoke cigarettes at all, your lungs or heart may be similarly damaged simply from exposure to ozone and particulate matter. The American Heart Association recently declared, "[Air pollution's] impact on cardiovascular disease … represents a serious public health problem."



Take Action! Go straight to the latest Action Alerts.

The Coalition for Clean Air is dedicated to restoring clean, healthful air to California by advocating responsible public policy, providing technical and educational expertise, and promoting broad-based community involvement.

Pollutants & Health Effects

-- Select Topic or Scroll Down --

Particulate Matter (PM)

Particulate matter or PM consists of soot and dust particles that are smaller than the diameter of a human hair. There are two classifications for particulate matter, PM10 and PM2.5. All particles smaller than 10 microns in diameter are classified as PM10, or coarse size particles. Fine size particles, or PM2.5, are those particles less than or equal to 2.5 microns in diameter. Particles that are smaller 2.5 microns are smaller than 1/8th the diameter of a human hair. Sources of PM include diesel exhaust, soil dust, tire wear, and soot. These particles penetrate deeply into the lungs and are captured by lung tissue. A major contributor to the PM pollution problem is exhaust from diesel vehicles, which produce 79% of the particulate emissions from mobile sources. The most dangerous aspect of PM pollution from diesel vehicles is the hundreds of different chemicals that are adsorbed to the particle. Exposure to PM pollution has been associated with respiratory and cardiac problems, infections, asthma attacks, lung cancer and decreased life expectancy. The World Health Organization has estimated that 500,000 premature deaths each year may be associated with PM pollution. Fine particulate air pollution (<2.5 microns) is thought to be more dangerous because of its ability to penetrate deeper into lung tissue. A recent study found that even a small increase in PM2.5 can result in a significant increase in mortality. In fact, The American Lung Association believes that PM2.5 represents the most serious threat to our health. Segments of the population that are more susceptible to PM pollution include children, athletes, senior citizens, and people with pre-existing respiratory problems.

Ozone (O3)

Ozone forms when hydrocarbons combine with nitrogen oxides and chemically react in sunlight. Hydrocarbons and nitrogen oxides are primarily produced by motor vehicles and various industrial practices. Ozone is a highly reactive oxidizing agent that breaks-down organic materials. Ozone is the primary component of smog, which has plagued Los Angeles

for many years. A natural phenomenon called an "inversion layer" traps these gases and prevents them from dissipating into the atmosphere. The result is a serious smog problem in the valleys and basins of Southern California. Smog and the related high ozone levels are not just a California problem; Texas City, Texas recorded the highest one-day ozone level in the country for 1999. As populations grow, ozone and smog are becoming problems for large cities throughout the country. Symptoms of ozone exposure are coughing, shortness of breath, wheezing, fatigue, throat dryness, chest pain, headache and nausea. Ozone has been shown to cause inflammation of lung tissue and reduced lung capacity. Development of asthma, increased lung cancer mortality rates, and accelerated lung aging have all been linked to ozone exposure. Lung damage from long-term exposure to ozone can be permanent, while short-term exposure appears to be reversible. Ozone reduces the respiratory system's ability to fight infection and remove foreign particles such as particulate matter. Segments of the population that are more susceptible to ozone pollution include children, athletes, senior citizens, and people with pre-existing respiratory problems.

Hydrocarbons

Hydrocarbons are a class of reactive organic gases or ROG, which are formed solely of hydrogen and carbon. Hydrocarbons contribute to the formation of ozone and the resulting smog problem. Carcinogenic forms of hydrocarbons are considered hazardous air pollutants, or air toxics. The incomplete burning of any organic matter such as oil, wood, or rubber produces hydrocarbons. Combustion engine exhaust, oil refineries, and oil-fueled power plants are the primary sources of hydrocarbons. Another source of hydrocarbons is evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint. The primary health effect of hydrocarbons results from the formation of ozone and its related health effects. High levels of hydrocarbons in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement.

Nitrogen Oxides (NOx)

Nitrogen monoxide (NO) and nitrogen dioxide (NO2) are the two forms of nitrogen oxide found in the atmosphere. Nitrogen oxides contribute to the formation of ozone, production of particulate matter pollution, and acid deposition. The presence of nitrogen oxides gives smog its brown appearance. Factories, motor vehicles and power plants that burn fossil fuels produce nitrogen oxides. Diesel engines produce a disproportionately large amount of NOx when compared to gasoline engines because of their high temperature combustion process. Nitrogen dioxide has been shown to irritate lung tissue, cause bronchitis and pneumonia, and reduce resistance to respiratory infections. The presence of NO2 in the atmosphere can have synergistic effects with other forms of air pollution. The health effects of ozone are magnified in the presence of nitrogen dioxide. Frequent or long-term exposure to high levels of nitrogen oxides can increase the incidence of acute respiratory illness in children.

Carbon Monoxide (CO)

Carbon monoxide is a colorless, odorless gas that is produced by burning organic matter such as oil, natural gas, fuel, wood, and charcoal. Motor vehicles produce 67% of the man-made CO that is released into the atmosphere. Carbon monoxide displaces oxygen in red blood cells, which reduces the amount of oxygen that human cells need for respiration. Exposure to CO can result in fatigue, angina, reduced visual perception, reduced dexterity, and death. The elderly, young children, and people with pre-existing respiratory conditions are particularly sensitive to carbon monoxide pollution. Carbon monoxide is extremely deadly in an enclosed space, such as a garage or bedroom.

The Coalition for Clean Air is dedicated to restoring clean, healthful air to California by advocating responsible public policy, providing technical and educational expertise, and promoting broad-based community involvement.

Transportation Facts

-- Select Topic or Scroll Down --

General

- California population (2003): 36,363,502
- Registered cars and trucks in California: 24 million
- Miles driven every day in California: 825 million
- Miles driven daily by the average driver: 36
- Gallons of fuel burned every day in California: 47 million
- Pounds of pollutants created daily: 5.4 million

Diesel

- Diesel exhaust is known to cause cancer, asthma, and other respiratory diseases.
- The health risk from diesel exposure is greatest for children and the elderly. The proximity of a child's residence and school to major roads is linked to asthma occurrence.
- Asthma limits children's ability to participate in sports, and is the most common cause of children's absence from school due to hospitalization.
- The State of California decided that there is enough evidence to list the particulate matter in diesel exhaust as a toxic air contaminant.
- Exhaust from heavy-duty diesel engines contains between 100-200 times more small particles than gasoline engine exhaust.
- California's Scientific Review Panel estimates that 16,000 Californians will develop lung cancer over a lifetime of diesel exhaust exposure.
- Only 2 percent of the vehicles on California's roads run on diesel. Yet they account for 31 percent of smog-forming nitrogen oxides, and for 79 percent of particular matter emissions from on-road vehicles.
- Cleaner alternatives to diesel are available, such as liquefied natural gas, compressed natural gas, or propane. Electric or fuel-cell engines are being enhanced to provide future alternatives.

P.O. Box 51124, Pasadena, CA 91115
no710extension@aol.com

April 13, 2011

Ron Kosinski
CALTRANS District 7
100 South Main Street, MS-16A
Los Angeles, CA 90012

Re: SR-710 North Gap Closure Project Scoping

Dear Mr. Kosinski:

Please enter the following information into the official scoping/EIR/EIS document for the tunnel extension project.

Respectfully,

The No 710 Action Committee

enclosures

SR-710 NORTH GAP CLOSURE
RESOLUTIONS & STATEMENTS AGAINST

There is broad opposition to extending the 710 freeway in any form as shown in the countless letters, declarations, and resolutions against the project. The groups represented by the statements are comprised of a wide variety of Community Leaders, State Representatives, City Officials and Councils, Neighborhood Councils, School Boards, Hospitals, Homeowners Associations, Community Groups, Environmental Advocates, and Plaintiffs in the lawsuit against the project.

Therefore, the No 710 Action Committee **instructs** Caltrans and Metro to:

Register all statements against the SR-710 North Gap Closure, officially into the public record

Consider that fierce opposition by the groups over a period of sixty years is proof that no community support exists for this project and that it is an unacceptable alternative to address regional transportation problems

See Appendix A - Resolutions and Statements Against the SR-701 North Gap Closure

Appendix A
Resolutions and Statements Against the SR-710 North Gap Closure

Support Documents for Declarative Statements (Printed)

Who Opposes the SR-710 North Extension?
Four Mayors' Letter – South Pasadena Review Article, 6-30-10
Glendale Mayor Ara Najarian Letter to MTA, 10-8-10
Assemblymember Anthony J. Portantino Letter to MTA, 4-22-10
Assemblymember Anthony J. Portantino Letter – Valley Sun Article, 9-29-10
Los Angeles Councilmember Ed Reyes Letter to MTA, 8-5-09
Congressmember Adam Schiff Letter to MTA, 4-20-10

Los Angeles City Council Resolution (Against Zones 1 & 2), 6-08
Los Angeles City Council Resolution (Against Zones 1 & 2), 9-30-09
City of Glendale Resolution, 7-28-09
City of La Cañada Flintridge Resolution, 3-29-10
City of South Pasadena Resolution, 2-2-11
Crescenta Valley Town Council Resolution, 6-11-09 and 3-10-10

Arroyo Seco Neighborhood Council Statement, 10-26-09
Eagle Rock Neighborhood Council Resolution, 12-7-10
Glassell Park Neighborhood Council Resolution, 9-15-09
Highland Park Neighborhood Council Resolution, 11-18-10
Sunland-Tujunga Neighborhood Council Resolution, 3-25-11
Glassell Park Improvements Association, Land Use Committee Statement, 9-09
Far North Glendale Homeowners Association Resolution, 9-09

La Canada Unified School District Resolution, 6-22-10
Huntington Hospital Letter to Caltrans, 3-14-11
Friends of the Earth Letter, 12-8-10
Taxpayers for Common Sense Letter, 12-9-10
Green Scissors Report, 2010
The Sierra Club Position, 12-16-97
National Resources Defense Council Letter, 6-16-10
U.S. Environmental Protection Agency Letter to MTA, 8-22-00

WHO OPPOSES THE SR-710 NORTH EXTENSION?

Resolutions and Statements Against

Glendale Mayor Ara Najarian
La Canada Mayor Donald Voss
South Pasadena Mayor Richard Schneider, MD
Assemblymember Anthony J. Portantino

Los Angeles City Council (Against Zones 1 & 2)
City of Glendale
City of La Cañada Flintridge
City of South Pasadena
Crescenta Valley Town Council

Arroyo Seco Neighborhood Council
Eagle Rock Neighborhood Council
El Sereno Neighborhood Council
Glassell Park Neighborhood Council
Greater Cypress Park Neighborhood Council
Highland Park Neighborhood Council
Lincoln Heights Neighborhood Council
Sunland-Tujunga Neighborhood Council
Glassell Park Improvements Association, Land Use Committee
Far North Glendale Homeowners Association
Glendale Homeowners Coordinating Council

Caltrans Tenants Association
LA RED, El Sereno
The Eagle Rock Association (TERA)
La Canada Unified School District
Friends of the Earth, Taxpayers for Common Sense, Environment America and Public Citizen in their Green Scissors 2010 Report

California Public Interest Research Group
Environment Defense Fund
National Resources Defense Council
Trust for Public Land

Plaintiffs in Lawsuit including Federal Injunction Against the Project
City of South Pasadena
Sierra Club
National Trust for Historic Preservation
South Pasadena Unified School District
South Pasadena Preservation Foundation
Pasadena Heritage
Los Angeles Conservancy
California Preservation Foundation

South Pasadena Review
HIGHLIGHTS FROM JUNE 30, 2010

Guest Commentary by Four Area Mayors

Metro is Missing a Huge Opportunity

By Ara Najarian, Donald Voss, Bill Bogaard and Richard Schneider

The directors of the Metropolitan Transportation Authority ("Metro") recently missed a golden opportunity to take a major step forward in the 50-year old controversy over how to relieve traffic congestion in the western San Gabriel Valley, particularly around the terminus of the 710 Freeway in Alhambra.

The occasion was the receipt by the directors of a geotechnical study, recently completed by Caltrans, to evaluate the potential of addressing the problem by extending the 710 Freeway northward by way of one of five potential tunnel routes.

Metro missed its opportunity by not committing to a process of evaluation and cost-benefit analysis of all viable transportation options for relieving traffic congestion.

Instead, Metro offered only a vague plan to launch a new round of studies on how traffic could be improved in the area. Our concern is that this may simply be a thinly masked effort to continue focus on only one option, the northward tunnel extension of the 710 freeway.

After the Federal Highway Administration in 2003 withdrew its support of an extension of the 710 Freeway at the surface, the idea of extending the freeway below the surface, in a deep tunnel, has been advocated. During this period, however, scant if any consideration has been given to modern alternatives to freeways. As Congressman Adam Schiff recently stated, "I believe the next logical step should be to consider a broad range of transportation options that might provide the same congestion-relief and improvement in the quality of life for residents of the region at a cost equal to or lower than the amount Metro estimates it would take to build one of the five tunnel alternatives."

As mayors of cities that are major stakeholders in the region, we believe Metro failed to consider three critical issues: first, what solution or solutions can improve regional traffic circulation and quality of life; second, what is the cost of the various alternatives, and which alternatives are the most cost beneficial; and third, what can be done to achieve what has been missing for over 50 years, a political consensus in support of the solution.

The fact is that there are several options that could be effective in tackling the traffic congestion. Recent Metro efforts to promote mobility in Southern California have included an expansion of bus and rail transit services, and investment into signal synchronization and transportation demand programs to provide a more balanced, multi-modal system throughout Los Angeles County. According to a recent Metro report, the next step needs to recognize current transportation planning requirements, as well as new and emerging environmental challenges, such as reducing greenhouse gas emissions.

The last estimate of tunnel construction was $5.6 billion, which is considerably higher than was estimated when the tunnel was first proposed. The actual cost is likely to be much higher. With this significant investment of taxpayer funds, other substantial projects for traffic mitigation become fiscally competitive. We owe it to taxpayers and residents to study all viable options in a project-neutral manner, to understand their costs, and to conduct proper cost benefit analyses.

Finally, as underscored by the long history of the 710 controversy, outreach and consensus building are now critical components in transportation planning. Many stakeholders feel that no alternative to freeway construction has been seriously entertained. The goal must be to achieve regional accord on the transportation solution that best reduces congestion while maintaining the quality of life in our neighborhoods.

At its board meeting last month, Metro directors delayed consideration of motions that will shape the contours of the 710 study. At this month's meeting, the directors, when considering the options, should seize the opportunity to conduct a project-neutral study of all viable transportation options to address traffic congestion. A detailed study that includes an analysis of costs and benefits, as well as identified sources of funding for each transportation option, must be available before a final environmental evaluation is conducted. The studies should also incorporate extensive community feedback – obtained through monthly outreach meetings throughout affected communities in the region and from stakeholder advisory committees – on all the options considered in the study.

Achieving regional consensus will be possible only if all options are considered seriously, fairly and objectively – otherwise the stalemate will only continue. We pledge our support of a genuinely responsible process, and are ready to participate fully in any way that might be helpful.

The authors are the Mayors of Glendale, La Cañada Flintridge, Pasadena, and South Pasadena, respectively.

October 8, 2010

Doug Failing
Executive Director, Highway Programs
One Gateway Plaza
Mail Stop 99-25-1
Los Angeles, CA 90012-2952

Dear Mr. Failing:

The purpose of this letter is to reiterate the position of the City of Glendale vis-a-vis the SR710 gap closure project. The City of Glendale remains consistent with Resolution No. 09-111 as approved by the Glendale City Council on July 28, 2009, which addresses the tunnel feasibility specifically and the general subject of "gap closure" alternatives for the SR 710 freeway from I-10 to SR 134/I-210. On behalf of my colleagues and the citizens of Glendale I want to reiterate our opposition to the SR 710 tunnel alternative or <u>any</u> "gap closure" alternative that has or could be developed. I would like to express our opposition as well to the continued effort and expenditure of tax payer monies in exploring, studying or developing any type of "gap closure" project. We do not believe that any type of "gap closure" alternative is in the best interest of the City or the region. We would like to express our belief and desire to instead look at other alternatives to addressing the concerns of mobility, congestion and the movement of freight from our ports. These alternatives would include the expansion of mass transit systems, upgrades and improvements to existing infrastructure and limiting the long distance movement of cargo/freight from our ports to only rail.

Again, the position of the City of Glendale is clear in this matter and we remain opposed to any other gap closure alternatives.

Sincerely,

Ara Najarian
Mayor

CAPITOL OFFICE
STATE CAPITOL
P.O. BOX 942849
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FAX (916) 319-2144

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(626) 577-9944
FAX (626) 577-2868

Assembly
California Legislature

ANTHONY J. PORTANTINO
ASSEMBLYMEMBER, FORTY-FOURTH DISTRICT

STANDING COMMITTEES
CHAIR, HIGHER EDUCATION
GOVERNMENTAL ORGANIZATION
PUBLIC SAFETY
TRANSPORTATION

April 22, 2010

The Honorable Ara J. Najarian
Chair
Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chairman Najarian and Board Members:

Thank you for your leadership on the Metropolitan Transportation Authority (Metro) Board of Directors. As you are keenly aware, there is insufficient information available for Metro and other stakeholders to appropriately determine the viability and feasibility of a bored tunnel option for the completion of the 710 gap closure. This lack of information is in direct conflict with the promises made to the 710 corridor and regional interests over the past five years. I respectfully ask that the Metro Board deny any motion that prematurely moves forward with an EIR 710 Tunnel project.

As there has been no cost-benefit analysis done for this proposal, and given the exorbitant expense expected for a tunnel project, the prudent, fiscally responsible approach would be to identify alternative options available to address the transportation and air quality challenges in our region. I fully agree with Congressman Adam Schiff in calling for a broad range of transportation options to be considered which provide the most cost effective alternatives available to us in overcoming the challenges that are currently present and anticipated in the future.

Frankly, I am disappointed with Metro's insistence on moving this project forward when basic and simple questions remain unanswered and the public continues to be fed cursory and inconclusive information beyond basic soils and seismic conditions. Although promised, to date no one has shown interest in answering the following questions in order to properly evaluate the merit of a bored tunnel option:

- Is a tunnel option financially feasible to finance?
- How many trucks and cars will utilize this option?
- What is the cost of a route through each zone studied?

As a policy maker, it is incomprehensible that anyone would advocate moving forward on a project of this historic magnitude without the basic answers to the above three questions.

As I have been saying since the beginning of this process, given the historical context of the 710 North particular attention must be paid to winning back the public's trust for any potential solution. Any move toward narrowing the route for a potential project is certainly premature and only serves to confirm the fears of impacted communities: that the 710 Tunnel Technical Study was structured merely to fulfill the terms of the restrictions placed on the study team by federal legislation and that Zone 3 was the only route that was seriously being considered. Within the 710 Tunnel Technical Study itself, there is no basis for a possible route to be narrowed down, as the report clearly states that it is geotechnically feasible to build a tunnel in any of the five zones. Finally, there is no financial data or traffic analysis on any of the five zones to evaluate their relative merit.

Given the current economic environment, it is critical that we, as policy makers, provide the hard working taxpayers of our State with the assurance that we are wisely utilizing transportation funds on projects that solve congestion and air quality problems in the most cost effective, comprehensive manner which takes into consideration current community conditions and the most advanced technologies available.

Let us not move forward simply for the sake of moving forward. Rather, let us join together to identify the best solutions that will serve our constituencies and communities in the manner in which they deserve.

Sincerely,

Anthony J Portantino

ANTHONY J. PORTANTINO
Assemblymember, 44th District

cc:
Mayor Don Voss, City of La Cañada Flintridge
Councilman Jose Huizar, City of Los Angeles
Mayor Bill Bogaard, City of Pasadena
Mayor Richard Schneider, City of South Pasadena

Excerpt from:

710 tunnel could devastate the region

By Assemblyman Anthony J. Portantino

September 29, 2010 | 2:19 p.m.

Today, the city of La Cañada Flintridge is under the direct threat of increased traffic congestion and air pollution from the proposed completion of the 710 Freeway. Caltrans and MTA are proposing to move forward with the scoping and environmental study of a tunnel as an alternative to a surface-routed 710.

Despite ardent calls from the La Cañada Flintridge City Council and my office to slow this process, freeway proponents plan to charge ahead, potentially before even January. It is imperative that we continue to advocate for a valid cost-benefit analysis before hundreds of millions of taxpayer dollars are wasted on a tunnel project that will be a financial disaster and devastate Northeast Los Angeles, South Pasadena, Pasadena, La Crescenta, Glendale and La Cañada Flintridge. Residents interested in helping to stop the 710 can sign up on Facebook (NO 710 Freeway Tunnel), or contact Jan Soohoo at jan@soohoos.org or (818) 952-4103. Additional information can be garnered from Julianne from my office and Ann Wilson at LCF City Hall. Get involved now before it's too late to stop this train wreck.

How did we get here, and what has La Cañada Flintridge been doing about it?

During the 1998 special election for a seat on our city council, former Los Angeles Fire Chief Don Manning was the first to highlight the 710 as a serious issue to be addressed. Upon being elected to the city council a year later, I requested we take a formal position to support an alternative to extending the 710 freeway. Today, the La Cañada Flintridge City Council continues to be a strong opponent of both the surface route and the tunnel extensions.

The 710 Freeway is a 50-year old transportation policy that fails to consider how the economy, workforce habits and transportation needs have all dramatically changed. In 2005, the Federal Highway Administration decertified the environmental impact report for the surface route and rescinded the record of decision, essentially deleting the freeway from the federal highway program. South Pasadena, Pasadena and La Cañada were all approached by the MTA, Caltrans and the Southern California Association of Governments and asked to entertain a tunnel option. South Pasadena and Pasadena took no formal position on the tunnel and voted not to oppose sound research of a tunnel option.

Some of the information that was shared with La Cañada contradicted the information shared with South Pasadena and Pasadena. Our city council was additionally asked to comment on documents that we were forbidden to read. The conclusion I drew from this request was that proponents wanted to publicly say that we were consulted, without actually sharing any information with us or garnering any meaningful input.

It became clear that project proponents were embarking on a severely flawed process of evaluating the feasibility of a tunnel as an option to a surface freeway. I have personally been misled on numerous occasions by proponents of the tunnel. The long-promised comprehensive feasibility study has never been completed and each faulty study has been followed by promises that the community's questions will be answered in the next study. To date, no one can tell you how much the project will cost and how many cars and trucks will use it. An average citizen would not choose to build an addition to his home without first knowing how many square feet he was building and how much it would cost. Yet, MTA and Caltrans are determined to march toward the tunnel without the answer to these two basic questions.

I have lost any trust that the pro-tunnel machine will be objective, or willing to provide appropriate answers to appropriate questions in the tunnel debate. There have been several efforts to utilize Sacramento in order to usurp the local process, most recently through a senate bill that sought to declare the tunnel as the preferred alternative to the gap closure. I strongly opposed this bill and worked to get the governor's office to veto it. I have joined with the city of La Cañada Flintridge as a vocal critic of the latest geotechnical study — not for its understanding of soils and subsurface conditions, but because it contains no comparative analysis or financial feasibility. Yet again, the proponents are preparing to move forward to the next study.

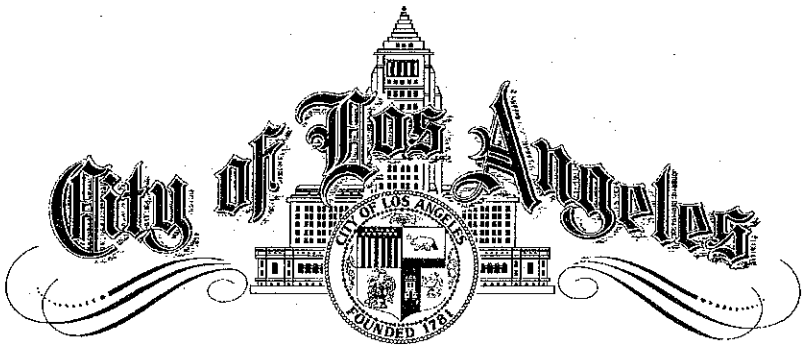
Recently, I brought my questions to the state transportation commission and, for the first time, felt that my concerns were considered. Our current city council has been doing an excellent job of collaborating with other freeway opponents and our mayors have attended many regional meetings, asking tough questions that search for answers. Many of those questions remain unanswered by tunnel proponents. There is also a renewed sense of urgency by our residents who have joined activists from surrounding communities in strong opposition to the 710. These efforts do make a difference. Writing to Chair James Earp of the California Transportation Commission, Chair Don Knabe of the MTA or Director Cindy McKim of Caltrans to share your views would be very helpful in our efforts to stop the 710.

There are some who believe that we should embrace the tunnel and trade a formal deletion of the surface route in exchange. The thinking seems to be that the tunnel will sink under its own financial weight and never get built. I disagree with this theory. I believe the tunnel proponents are serious in their desire to complete the tunnel, and that anything that we do to help it along will make increased traffic on the 210 much more likely. A freeway tunnel in today's Los Angeles County is outdated and unnecessary. Modern transportation planners are reintroducing mass transit and alternative methods of moving goods. The cost of a tunnel option will be astronomical and since no traffic analysis has been undertaken in consideration of today's traffic patterns, there is no guarantee that a tunnel will provide the congestion and air-quality relief that would justify such an amount of money. Meanwhile, there are a number of other contemporary transportation projects that can be completed for a fraction of the tunnel's cost.

Residents in the corridor must work together and resist efforts to be split off, or splintered, by the pitting of one proposed route against others. This project will be devastating for our entire region. It is not an upstream or downstream, east or west issue. This is an outmoded, shortsighted plan on its way to becoming a train wreck. Decades of construction and billions of dollars must not be wasted on a project that does not solve a transportation problem and is unnecessary in our region. I am honored to stand with those who continue to issue a clarion call for modern 21st-century solutions that address our congestion and air-quality issues, developed in a transparent and open process, that truly considers the input and well-being of all stakeholders throughout our communities.

ANTHONY J. PORTANTINO (D-La Cañada Flintridge) represents the 44th District in the California State Assembly. His office phone number is (626) 577-9944.

200 N. Spring Street
City Hall, Room 410,
Los Angeles, CA 90012
(213) 485-3451 Phone
(213) 485-8907 Fax



District Office
163 S. Ave. 24
Room 202
Los Angeles, CA 90031
(213) 485-0763 Phone
(213) 485-8908 Fax

ED P. REYES
Councilmember, First District

August 5, 2009

Mr. Douglas R. Failing, District Director
California Department of Transportation, District 7
100 S. Main Street
Los Angeles, CA 90012

Dear Mr. Failing:

I am writing to express my opposition to any tunnel or surface route of the SR 710 Freeway Expansion that would go through the First Council District, more specifically Study Zones 1 and 2.

The goal of the SR 710 expansion is to close the gap between the end of the 710 Freeway and the Interstate 210 Freeway. I understand that Caltrans has conducted a geo-technical route neutral study to determine the feasibility of the SR 710 tunnel. However, it seems that the most reasonable and practical route would be the most efficient route as determined by distance, cost, and environmental considerations. Although not all of the preceding information is yet available, proposing that the 710 expansion go through Zones 1 or 2 already seem to be impractical and not cost effective based on distance alone.

Another issue I have with the SR 710 Freeway Expansion Study is the addition of Task Order No. 5 to the scope of work. Analyzing environmental conditions such as Traffic Evaluations, Tunnel Configurations, Tunnel System Evaluations, Air Quality, Noise Studies, Portal Impacts, and Cost Considerations would be more appropriately addressed in an Environmental Impact Report. The additional cost associated with this study is wasteful, misleading to the public and provides an analysis that does not fully investigate the environmental impacts of any alternative. I urge you to reconsider spending additional public funds on Task Order No. 5.

In closing, the build out of State Route 710 will have great regional impact to the City and County of Los Angeles, I hope that the concerns raised by myself, the Steering Committee and the public will be wholeheartedly taken into account

throughout this process. Please feel free to contact Susan Wong of my staff should you have any questions at (213) 473-7001.

Sincerely,

ED P. REYES
Councilmember, First District

Cc: Mayor Antonio Villaraigosa
Supervisor Gloria Molina, First District
Assemblymember Kevin de Leon, 45th Assembly District
Senator Gil Cedillo, 22nd Senatorial District
Arthur Leahy, CEO, Metropolitan Transportation Authority

APPROPRIATIONS COMMITTEE
SUBCOMMITTEE ON STATE, FOREIGN OPERATIONS, AND RELATED PROGRAMS
SUBCOMMITTEE ON COMMERCE, JUSTICE, SCIENCE AND RELATED AGENCIES
SUBCOMMITTEE ON FINANCIAL SERVICES
SELECT INTELLIGENCE OVERSIGHT PANEL

JUDICIARY COMMITTEE
SUBCOMMITTEE ON COURTS, THE INTERNET AND INTELLECTUAL PROPERTY

PERMANENT SELECT COMMITTEE ON INTELLIGENCE
SUBCOMMITTEE ON TERRORISM, HUMAN INTELLIGENCE, ANALYSIS AND COUNTERINTELLIGENCE
SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS

ADAM B. SCHIFF
29TH DISTRICT, CALIFORNIA

WASHINGTON OFFICE:
326 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-4176
FAX: (202) 225-5828

DISTRICT OFFICE:
87 NORTH RAYMOND AVENUE
SUITE 800
PASADENA, CA 91103
(626) 304-2727
FAX: (626) 304-0572

E-MAIL VIA WEB ADDRESS AT:
www.house.gov/schiff

April 20, 2010

The Hon. Ara J. Najarian
Chair
Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chairman Najarian and Board Members:

As you know, some years ago I secured $2.4 million to fund a route neutral analysis of the technological feasibility of a tunnel in any potentially viable corridors. It was my belief then, as it is now, that this study needed to be objective and thorough so that policy leaders and the public could make well-informed decisions about the next steps to improve traffic flow and reduce congestion in our region. I considered this to be the first stage of a rational process to end the decades-long debate about how to better move people in our traffic congested communities.

The recently released Final State Route 710 Tunnel Geotechnical Study showed that a tunnel was technically feasible in all five zones studied in the report. This was an important conclusion, because it informs us that we now have a new and serious option to be considered in determining the best way forward for our region.

As I indicated in my meeting of March 1st with Metro Director of Highway Programs Doug Failing, Caltrans Director Randell Iwasaki, and Caltrans District Director Michael Miles, I believe that the next logical step – or second stage of the process -- should be to consider a broad range of transportation options that might provide the same congestion relief and improvement in the quality of life for residents of the region at a cost equal to or lower than the amount Metro estimates it would take to build one of the five tunnel alternatives. As the cost of building the tunnel is considerably higher than first estimated (when proposed only a few years ago, it was suggested the tunnel could be completed at not much more than the at-grade proposal, or for around $1.3 billion, and I understand that it is currently estimated to cost approximately $5 billion), this makes other substantial transportation projects now fiscally competitive. The tunnel may prove to be the best solution, and I continue to reserve judgment, but we owe it to the taxpayers and residents to consider any cost-effective solution.

Stakeholders in all parts of the region should be consulted about which options should be part of this second stage analysis. All viable options that can compete with the cost of the tunnel should be given the same neutral and objective consideration that characterized the tunnel study just concluded, in a process which invites substantial input from all the affected communities. Ultimately, every community should feel that its input on the matter is thoroughly considered and analyzed and all concerns are addressed fairly. Just as the tunnel study was conducted in a route neutral manner, so should this next-step analysis consider transportation alternatives in a project neutral manner -- neither presuming nor precluding any viable cost-effective solution.

It is my understanding that a motion to recommend moving forward with the environmental stage of the 710 study, and only looking at one of the zones in the technical feasibility study --

THIS STATIONERY PRINTED ON PAPER MADE OF RECYCLED FIBERS

Zone 3 -- will be introduced at the upcoming Metro Board meeting on April 22, 2010. I believe this would be premature. The latest Caltrans study determined tunnel feasibility, but did not ascertain the best transportation solution to alleviate congestion and poor air quality in the affected communities. The study did not include a cost-benefit analysis as to why any potential tunnel route should be the focus of an environmental document to the exclusion of any of the others, and more significantly, did not consider the wide range of other options that might be undertaken for the same cost or less. This is not a criticism of the tunnel feasibility study, which was a strong, credible analysis, but it was simply beyond the scope of anything the study considered or was intended to consider.

I'm concerned that arbitrarily choosing to do an environmental study primarily focusing on Zone 3 -- for so long the preferred approach of Metro and Caltrans -- would color the outcome of the study and would lack credibility with the public. In all likelihood, it would result in the same levels of community disagreement that Caltrans's 1992 EIS on the issue generated. The EIS completed by Caltrans in 1992 referred to a proposed project consisting of "the construction of a freeway-transitway along the Meridian Variation alignment between Route 10 and Route 210." This EIS considered a total of 24 alternatives, but 22 of them were minor variations to the traditional Meridian alignment of a surface completion of the freeway, and only the remaining two considered a substantive alternative. The document failed to achieve any level of community consensus, as many stakeholders felt that no alternative to freeway completion was seriously entertained. The goal here should be to arrive at a regional accord if possible on the transportation solution which best reduces congestion while maintaining the quality of life in our neighborhoods.

Once we have identified and agreed upon the best transportation solution for our region, then we should move on to the third stage of the process -- the EIR/EIS of that solution.

During the March meeting, Director Failing indicated that some of the $2.4 million I secured for the feasibility study had not been fully used. Language that I inserted in the SAFETEA-LU Technical Corrections Act of 2008 required that none of these federal funds "be used for preliminary engineering or environmental review except to the extent necessary to determine feasibility." As such, they could not be used for an environmental study beyond the scope of feasibility, but I would be pleased to work with the House Transportation and Infrastructure Committee to try to reprogram these remaining funds for the second stage analysis of viable transportation options in our region.

I look forward to continuing our work on this vital issue, and appreciate your consideration of my thoughts on the way forward.

Sincerely,

ADAM B. SCHIFF
Member of Congress

cc:
Michael Miles, Caltrans District 7, District Director
Senator Carol Liu
Senator Gill Cedillo
Senator Gloria Romero
Assemblymember Anthony Portantino
Assemblymember Michael Eng
Mayor Bill Bogaard, City of Pasadena
Mayor Richard Schneider, City of South Pasadena
Mayor Anthony Wong, City of Monterey Park

Mayor Stephen Sham, City of Alhambra
Mayor Albert Huang, City of San Gabriel
Mayor Laura Olhasso, City of La Cañada Flintridge
Mayor Dennis Kneier, City of San Marino

RESOLUTION

WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before, a local, state or federal governmental body or agency must have first been adopted in the form of a Resolution by the City Council with the concurrence of the Mayor; and

WHEREAS, in June 2008, Caltrans and the Los Angeles County Metropolitan Transportation Authority (Metro) began the I-710 Tunnel Technical Study to examine the possibility of extending the I-710 using a tunnel; and

WHEREAS, information gathered throughout the Study, which is not an environmental assessment, will describe soil and sub-surface conditions and will determine the feasibility of building a tunnel to complete I-710; and

WHEREAS, the addition of Task Order No. 5 to analyze environmental conditions such as traffic, tunnel configurations, air quality, just to name a few, would be more appropriately addressed in an Environmental Impact Report; and

WHEREAS, all practicable means for extending the I-710 are being considered within the study area, which is currently divided into five (5) Zones; and

WHEREAS, even though not all the information is yet available, proposing that the I-710 be expanded through Zones 1 or 2 in the City of Los Angeles seems to be impractical and not cost-effective based on distance alone.

NOW, THEREFORE, BE IT RESOLVED, with the concurrence of the Mayor, that by the adoption of this Resolution, the City of Los Angeles hereby includes in its 2009-10 State Legislative Program OPPOSITION to the extension of 710 through Zones 1 and 2 as defined by Caltrans in their SR-710 Tunnel Technical Study.

BE IT FURTHER RESOLVED, in light of the recent passage of SB 545 by the California State Legislature, which fails to offer protection for the community of El Sereno if a freeway tunnel is constructed, the City also OPPOSES any freeway tunnel portal that does not begin south of Valley Boulevard.

PRESENTED BY: _____

ERIC GARCETTI	**JOSE HUIZAR**	**ED P. REYES**
Councilmember	Councilmember	Councilmember
13th District	14th District	1st District

SECONDED BY: _____

09-0002-S189

INFORMATION TECH. & GOVT. AFFAIRS

SEP 30 2009

RESOLUTION

WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies proposed to or pending before, a local, state or federal governmental body or agency must have first been adopted in the form of a Resolution by the City Council with the concurrence of the Mayor; and

WHEREAS, in June 2008, Caltrans and the Los Angeles County Metropolitan Transportation Authority (Metro) began the I-710 Tunnel Technical Study to examine the possibility of extending the I-710 using a tunnel; and

WHEREAS, information gathered throughout the Study, which is not an environmental assessment, will describe soil and sub-surface conditions and will determine the feasibility of building a tunnel to complete I-710; and

WHEREAS, the addition of Task Order No. 5 to analyze environmental conditions such as traffic, tunnel configurations, air quality, just to name a few, would be more appropriately addressed in an Environmental Impact Report; and

WHEREAS, all practicable means for extending the I-710 are being considered within the study area, which is currently divided into five (5) Zones; and

WHEREAS, even though not all the information is yet available, proposing that the I-710 be expanded through Zones 1 or 2 in the City of Los Angeles seems to be impractical and not cost-effective based on distance alone;

NOW, THEREFORE, BE IT RESOLVED, with the concurrence of the Mayor, that by the adoption of this Resolution, the City of Los Angeles hereby includes in its 2009-10 State Legislative Program OPPOSITION to the extension of 710 through Zones 1 and 2 as defined by Caltrans in their SR-710 Tunnel Technical Study and SUPPORT for a study that explores a tunnel option to close the I-210/I-710 gap via Zone 3 where construction of any portal begins south of Valley Boulevard to eliminate disruption to the residential neighborhoods in the community of El Sereno.

PRESENTED BY: _____
ERIC GARCETTI
Councilmember 13th District

_____
JOSE HUIZAR
Councilmember 14th District

_____
ED P. REYES
Councilmember, 1st District

SECONDED BY: _____

ORIGINAL

September 30, 2009

Adopted
7/28/09
Drayman/Friedman
Noes: Weaver

RESOLUTION NO. 09-111

RESOLUTION OF THE COUNCIL OF THE CITY OF GLENDALE OPPOSING ALTERNATIVES FOR THE PROPOSED "GAP" CLOSURE OF THE SR 710 FREEWAY BETWEEN THE I-10 AND THE I-210/SR 134 FREEWAYS.

WHEREAS, as long as 40 years ago the State Department of Transportation proposed an extension of the SR 710 Freeway to "close a gap" between the Interstate 10 Freeway to the South and Interstate 210 and the SR 134 Freeways to the North to relieve circuitous travel and traffic congestion; and

WHEREAS, the impacts of said freeway extension have been debated at length; and

WHEREAS, in 2006, a Tunnel Feasibility Assessment Study (STUDY) concluded that an option to construct a tunnel to close the gap between the I-10 and the SR-134/I-210 (Tunnel Alternative) was feasible; and

WHEREAS, the California Department of Transportation is now expanding the STUDY to review possible tunnel route options, conducting geo-technical surveys and engaging in public outreach and education; and

WHEREAS, there has been much debate about the potential impacts on local roads and highways, in and around Glendale should a Tunnel or any other "gap closure" alternative be selected and constructed, including a projection that daily traffic would increase significantly as follows: over 30,000 vehicles per day on the I-210 North of the SR 134; about 2500 daily truck trips on I-210 between the SR-134 and SR-2; about 2500 daily truck trips on I-210 between the SR-2 and I-5; approximately 1000 vehicles per day

on Foothill Boulevard between the SR-134 and SR-118.

NOW THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF GLENDALE, CALIFORNIA:

SECTION 1. That the Council hereby expresses its OPPOSITION to the Tunnel or any other alternative for the proposed "gap closure" of the SR 710 Freeway between the I-10 and the I-210/SR 134 Freeways.

SECTION 2. The Council further authorizes the Mayor or the City Manager to take such other future action, including letters and/or other lobbying efforts, that they deem necessary to express OPPOSITION to any alternative proposing a "gap closure".

SECTION 3. The Council further expresses interest in the review, assessment and study of alternatives which do not include a "gap closure" proposal.

Adopted this 28th day of July, 2009.

Mayor

ATTEST:

City Clerk

APPROVED AS TO FORM

CITY ATTORNEY

DATE 7-29-09

STATE OF CALIFORNIA)
) SS
COUNTY OF LOS ANGELES)

I, ARDASHES KASSAKHIAN, City Clerk of the City of Glendale, certify that the foregoing Resolution No. 09-111 was adopted by the Council of the City of Glendale, California, at a regular meeting held on the 28th day of July, 2009, and that same was adopted by the following vote:

Ayes: Drayman, Friedman, Najarian, Quintero

Noes: Weaver

Absent: None

Abstain: None

City Clerk

CITY OF LA CAÑADA FLINTRIDGE

CM Review: _____
Fiscal Review: _____

CITY COUNCIL AGENDA REPORT

MEETING DATE:	March 29, 2010
SUBJECT:	Resolution opposing the tunnel alternative to the extension of the SR-710 freeway between the I-10 and the I-210 freeways and calling on Metro, Caltrans and SCAG to find new, effective alternatives to resolve congestion
PRESENTER:	Ann Wilson, Senior Management Analyst
REQUESTED ACTION:	Approve Resolution
FISCAL IMPACT:	None

DESCRIPTION: Since 1959, the State of California has wanted to connect the SR-710 to the I-210, and pushed forward with a surface highway route through the City of South Pasadena and extending north to the I-210. This alternative, through many legal actions, was found to be environmentally unworkable and the state withdrew its Notice of Determination in 2004

In 2002, Caltrans, in consultation with the Federal Highway Administration, determined that the consideration of a tunnel was appropriate as an alternative to the surface highway route. By 2006, the Los Angeles County Metropolitan Transportation Authority (Metro) had conducted their "Route 710 Tunnel Technical Feasibility Assessment Report," which concluded that the tunnel was "feasible" and stating that any environmental considerations could be "minimized, eliminated or mitigated." The City of La Cañada Flintridge, its comments and objects submitted to Metro, argued, in part, that the study was not environmentally based, thus, did not adequately cover environmental issues, therefore, such a conclusion could not be reached.

The University of Southern California, Keck School of Medicine, Division of Environmental Health, Department of Preventative Medicine, independently reviewed the Metro study. Dr. Rob McConnell stated in his analysis that "the increase in truck and automobile traffic on the I-210 freeway resulting from the proposed SR-710 extension would increase the exposure of surrounding communities to vehicular pollutants that may cause asthma and other respiratory disease." In addition, the USC Children's Health Study stated that there is "emerging scientific consensus that residential or school proximity to major traffic corridors is associated with respiratory impairment in children and in adults." Additionally, this study indicated that residential proximity to freeways is associated with increased rates of asthma, and that a group a pollutants is associated with slower growth in lung function, which is a strong predictor of debilitating lung disease and mortality in later life." The City of La Cañada Flintridge has over 20 schools in close proximity to the freeway, as well as many homes.

In 2008, over the objections of the City of La Cañada Flintridge and the City of South Pasadena, as well as Assembly Member Portantino's office, both the Southern California Association of Governments (SCAG) and Metro had adopted the tunnel as a priority project in their Long Range Transportation Plans. These actions demonstrated that this project was the primary project both regional agencies considered to be the solution to the congestion problems for the area and the larger region.

Also in 2008, Caltrans and Metro began their "SR-710 Tunnel Technical Study." This study, in final draft form now, studied only the geotechnical aspects of the tunnel. The City of La Cañada Flintridge

submitted comments and objections to this study, finding in part that the study did not contain sufficient review of the information obtained.

Additionally in 2008, Metro passed an ordinance which proposed the placement of Measure R, a sales tax initiative, on the November ballot. The Measure contained $780 million to go towards the tunnel. Since the proposed project had not undergone adequate review under the California Environmental Quality Act (CEQA), and, thus, should not be funded, the City of La Cañada Flintridge and the City of South Pasadena filed lawsuits to prevent this project from being funded. However, at this time, the tunnel will still receive this funding.

In 2009, the City of Glendale passed a Resolution opposing alternatives to the proposed "gap" closure of the SR-710 freeway between the I-10 and the I-210/SR134 freeways.

Also, in 2009, SCAG conducted a study entitled the "SR-710 Missing Link Truck Study (Preliminary Draft Final Report)" which was conducted for the Arroyo-Verdugo Subregion to predict truck and other traffic that might occur as a result of the completion of the SR-710 extension along its originally planned route through (or under) the City of South Pasadena. The City of La Cañada Flintridge Traffic Engineer, upon analysis of the information in the report, made the following important findings:

1. Of the 80+ study segments that are currently operating over capacity (Level of Service (LOS) "F" – the lowest rating Caltrans can give and the point at which gridlock occurs, over 60 (75%) of these segments will remain over capacity after a tunnel is built.
    a. Many believe that streets such as Fair Oaks Blvd., Fremont Avenue, Los Robles Avenue and Atlantic Boulevard would begin to improve once a tunnel was built. However, these streets will still operate over capacity with severe congestion.
    b. At least 12 arterial streets...will experience higher traffic volumes solely due to the tunnel.
2. If the tunnel is completed by 2030, the following is projected to occur:
    a. More than a 25% increase in daily traffic volumes on I-210;
    b. An additional 30,000 vehicles per day on I-210;
    c. An additional 2,500 trucks per day on I-210;
    d. 850 additional trucks in the PM peak hour on I-210;
    e. Truck percentage on I-210 will increase from 11% to over 20%; and
    f. Since portions of the I-210 will operate at Level of Service (LOS) "F," traffic will be forced onto local streets.
3. The overall number of vehicle miles traveled would increase in the peak hour, bringing many environmental impacts.
4. The overall number of vehicle hours would increase (more delay, gas consumption and air pollution).
5. The system-wide, regional benefit would only be an increase in overall speed of .6 miles per hour.
6. Motorists would be driving farther and spending more time on the road if the tunnel is built.

The SCAG and USC studies together indicate the following conclusions:

- If the tunnel is completed, 75% of local streets would still be gridlocked;
- The tunnel would cause significant, detrimental traffic and truck impacts on the I-210 freeway through the cities of Glendale, Pasadena, La Cañada Flintridge, and the community of La Crescenta;
- The tunnel connection would make overall driving conditions worse regionally;
- The tunnel itself would be gridlocked soon after completion;
- Due to a lack of substantive reduction of gridlock, most of the residents south of the tunnel would continue to be impacted by respiratory problems associated with pollution and the residents along the I-210 freeway would have increased gridlock. Those residents would therefore see an increase in respiratory problems, particularly affecting children and other residents along the freeway.

These conclusions show the tunnel to be ineffective, and in fact, detrimental, not just for the City of La Cañada Flintridge, but for the region in general.

The attached resolution formalizes the long-held opposition of the City Council to both the surface highway route and the tunnel. It also calls upon Metro, Caltrans and SCAG to find effective alternatives to resolve the congestion problem.

OPTIONS:

1. Approve the Resolution opposing the tunnel alternative to the extension of the SR-710 freeway between the I-10 and the I-210 freeways and calling on Metro, Caltrans and SCAG to find new, effective alternatives to resolve congestion.
2. Do not approve the Resolution and provide staff with further direction.

RECOMMENDATION: Approve the Resolution opposing the tunnel alternative to the extension of the SR-710 freeway between the I-10 and the I-210 freeways and calling on Metro, Caltrans and SCAG to find new, effective alternatives to resolve congestion.

ATTACHMENTS:

1. Resolution opposing the tunnel alternative to the extension of the SR-710 freeway between the I-10 and the I-210 freeways and calling on Metro, Caltrans and SCAG to find new, effective alternatives to resolve congestion.

RESOLUTION NO. 10-12

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LA CAÑADA FLINTRIDGE OPPOSING THE TUNNEL ALTERNATIVE TO THE EXTENSION OF THE SR-710 FREEWAY BETWEEN THE I-10 AND THE I-210 FREEWAYS AS WELL AS THE STATE-ADOPTED SURFACE ALTERNATIVE AND CALLING ON METRO, CALTRANS AND SCAG TO FIND NEW AND EFFECTIVE ALTERNATIVES TO RESOLVE CONGESTION

WHEREAS, the area between the I-10 and the I-210 suffers from congestion; and

WHEREAS, a viable regional solution for this congestion must be found; and

WHEREAS, in 1959, the State of California adopted the highway surface route extending north from the I-710 freeway to the I-210 freeway; and

WHEREAS, the City of South Pasadena, beginning in 1964, has filed many objections, injunctions and lawsuits in an ongoing dispute over the surface alternative; and

WHEREAS, in 2002, Caltrans and the FHWA determined that consideration of a tunnel as an alternative to the surface highway route was appropriate; and

WHEREAS, in 2006, Metro released its "Route 710 Tunnel Technical Feasibility Assessment Report," declaring the tunnel to be a "feasible" alternative and stating that environmental considerations could be "minimized, eliminated or mitigated;" and

WHEREAS, the City of La Cañada Flintridge submitted comments and objections to Metro, stating, in part, that there was insufficient evidence in the report to make such a finding, and the study, as well as its conclusion was flawed, since very little environmental study was conducted; and

WHEREAS, in 2007 and 2008, the Southern California Association of Governments (SCAG) and Metro individually included the tunnel as a priority project within their adopted Regional Transportation Plans, thereby demonstrating that the potential project had been chosen as the major as well as the most costly project to resolve the congestion problems which exist in the immediate region; and

WHEREAS, in 2008, Caltrans and Metro began their "SR-710 Tunnel Technical Study," a study which was to be "route-neutral" and which would study technical feasibility, particularly geotechnical feasibility; and

WHEREAS, the "SR-710 Tunnel Technical Study" final draft was completed in March 2009 with the City submitting comments and objections to Caltrans and Metro regarding this study, stating in part, that the study does not contain sufficient review of the information obtained; and

WHEREAS, in 2008, Metro passed an ordinance to place Measure R on the ballot, including $780 million for the tunnel, despite that the proposed tunnel project had not undergone proper CEQA review, which was approved by voters by a narrow margin; and

WHEREAS, based upon the Southern California Association of Governments "SR-710 Missing Ling Truck Study" (Preliminary Final Draft) (released in 2009); if the tunnel is completed: (1) 75% of local surface streets would still be gridlocked, operating over capacity with severe

congestion, with at least twelve arterial streets experiencing higher traffic volumes solely due to the tunnel (2) the tunnel would cause significant detrimental traffic and truck impacts on the I-210 freeway through the cities of Glendale, Pasadena, La Cañada Flintridge and the community of La Crescenta (more than a 25% increase in daily volumes on I-210; an additional 30,000 vehicles per day on I-210; 850 additional trucks in the PM peak hour on I-210; truck percentage will increase from 11% to over 20%); and since portions of the I-210 will operate at Level of Service (LOS) F, traffic will be forced onto local streets; and (3) the tunnel connection would make overall driving conditions worse regionally (motorists would be driving farther and spending more time on the road); and

WHEREAS, based upon the Metro "Route 710 Tunnel Technical Feasibility Assessment Report" (2006), the tunnel is projected to be gridlocked soon after completion; and

WHEREAS, based upon a variety of University of Southern California (USC) studies, including the USC California Children's Health Study, due to a lack of substantive reduction of gridlock (as found by other studies), most of the residents south of the tunnel would continue to be impacted by respiratory problems associated with pollution, and the residents along the I-210 freeway would have increased gridlock, with those residents seeing an increase in respiratory problems, particularly affecting the lungs of children and other residents along the freeway; and

WHEREAS, the projected cost to design and construct the tunnel are several billion dollars;

NOW, THEREFORE, BE IT RESOLVED, that the City of La Cañada Flintridge opposes any approval or expenditure of funds for the I-710 proposed tunnel project and the state-adopted surface highway route, neither of which have passed CEQA review, and finds that both alternatives are ineffective, 20th-century solutions for the existing regional congestion problems, which require 21st-century solutions.

Be it also resolved that the City of La Cañada Flintridge calls on Metro, Caltrans and SCAG to find other new, effective alternatives to these projects, including those alternatives using rail as the mode of transportation, which will truly solve the region's congestion problems.

PASSED, APPROVED and ADOPTED this 29th Day of March, 2010.

_____
Laura Olhasso, Mayor

ATTEST:

_____
Sylvia Baca, City Clerk

State of California)
County of Los Angeles) ss.
City of La Cañada Flintridge)

I, Sylvia Baca, City Clerk of the City of La Cañada Flintridge, California, do hereby certify that the foregoing Resolution No. 10-12 was duly adopted by the City Council of the City of La Cañada Flintridge at a Regular Meeting held on the 29th day of March 2010, by the following vote:

AYES: COUNCILMEMBERS:
NOES: COUNCILMEMBERS:
ABSENT: COUNCILMEMBERS:
ABSTAIN: COUNCILMEMBERS:

Dated:

_____
Sylvia Baca, City Clerk

RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SOUTH PASADENA, CALIFORNIA, RE-AFFIRMING THE CITY'S OFFICIAL POSITION ON THE STATE ROUTE 710 FREEWAY EXTENSION, SUPPORTING A MULTI-MODE ALTERNATIVE AND RESCINDING RESOLUTIONS 6960 AND 7134

WHEREAS, for nearly sixty years, Caltrans has proposed freeway routes that impose unacceptable impacts on and irreparable harm to the City of South Pasadena and other cities, and the South Pasadena City Council has consistently and vigorously opposed proposed State Route 710 (SR-710) North extensions; and

WHEREAS, the City of South Pasadena and the National Trust for Historic Preservation, the Sierra Club, Natural Resources Defense Council, the Trust for Public Land, the Environment Defense Fund, California Public Interest Research Group, Friends of the Earth, Taxpayers for Common Sense, and others are on record in favor of a multi-mode alternative, a thoughtful and much-needed conceptual regional transportation plan designed by a nationally-renowned transportation engineering firm, with the input of a broad based coalition of environmental, historic preservation, neighborhood, grass-roots organizations and citizens within South Pasadena and other cities, to improve travel within the region and to protect the environment and relieve traffic congestion, provide jobs, preserve affordable housing, and to save historic neighborhoods, and could now be updated and expanded to include measures beyond the immediate corridor that vitiate the need for any form of freeway extension; and

WHEREAS, the following public officials and reports have all declared that the surface route 710 extension will never be built because of its unacceptable environmental impacts: former Southern California Association of Governments (SCAG) executive director Mark Pisano while in office; former Department of Transportation (Caltrans) District 7 Director Doug Failing, who is now on Metropolitan Transportation Authority (Metro) staff; Alhambra city official Barbara Messina; Senator Gil Cedillo; Assembly Member Michael Eng, and legislative committee reports; and

WHEREAS, while SCAG removed the surface route 710 North Extension from the regional transportation plan, it wrongfully included as a constrained project a bored tunnel (tunnel) to extend the SR-710 freeway from its northern terminus at Valley Boulevard in the El Sereno community of the City of Los Angeles to the 210 freeway in the City of Pasadena, despite the failure of the tunnel to meet the federal criteria of a constrained project; and

WHEREAS, despite South Pasadena's persistent requests, neither Caltrans nor the state administration will officially remove the SR-710 North surface extension from the Streets and Highways Code (even though the Legislature enrolled SB 545 to that effect), or otherwise stipulate in *South Pasadena v. Slater* in the United States District that the surface freeway will not be considered in future action; and

WHEREAS, despite the requirement from the Federal Highway Administration in its record of decision on the freeway that there be an analysis of the effectiveness of interim improvements in the freeway corridor before considering the freeway extension, no such analysis has been conducted; and

WHEREAS, the City's 2003 resolution reiterating its opposition to a freeway but stating that it did not oppose sound research evaluating a tunnel produced no cooperation from state and regional authorities to meet the city's need for removal of the surface route and release of Caltrans-owned properties whose surface estates are no longer needed; but has instead produced a series of unwarranted efforts to accelerate tunnel approval and funding in advance of the required sound research and environmental assessment, while tunnel proponents have misstated the City's position, producing unwarranted distrust of the City Council among South Pasadena citizens; and

WHEREAS, since the City's 2003 resolution, two reports have been presented, the latest of which proposes that a tunnel is geotechnically feasible in five possible corridors; neither of these reports, however, answered the basic questions of this alternative's benefits and costs, both social and fiscal; and

WHEREAS, Metro included $780 million for an SR-710 tunnel in Measure R, the sales tax initiative that passed in November, 2008, and has since increased the amount to $1.18 billion, although this would be only a small portion of the cost of the tunnel, which has been subject to cost estimates of up to $11.8 billion; and

WHEREAS, there have been conflicting reports with regard to the use of, or the need for, the proposed tunnel alternative, with Caltrans emphasizing commuter and street congestion relief with no truck traffic diversion from Route 5, even though this was an early freeway objective, while the recent legislative efforts (SB 545) emphasized goods movement, and a SCAG draft study projected that completion of a 710 tunnel would greatly increase the number of trucks traveling up the 710 freeway and east on the 210 freeway; and

WHEREAS, tunnel proponents propose that a tunnel be constructed in a public/private partnership (PPP) and that the tunnel be operated as a toll facility that would primarily serve truck traffic emanating from the Ports of Los Angeles/Long Beach; and yet several privately-funded toll roads in Southern California have become insolvent or resulted in bankruptcy, requiring further public investment exceeding that originally envisioned for such projects; and

WHEREAS, public health studies show that persons living near freeways and tunnels are exposed to an increased risk of illness and death; in 1998 the former Regional Administrator of the United States Environmental Protection Agency questioned the air quality benefits of the proposed freeway extension; responsible studies show that new freeways actually induce traffic (including traffic on adjacent surface streets) in the long run; and safety concerns would likely require that the design of a tunnel include emergency exits; and

WHEREAS, Caltrans has not properly maintained the hundreds of houses that it owns in the previously adopted freeway corridor, and their continued ownership of these houses is contrary to the interests of the cities in which the houses are located and the residents of the houses alike; and

WHEREAS, Caltrans expresses a desire to be out of the landlord business, and the State is now putting many of its public properties up for sale, but the State refuses to release the surface estates in the more than 500 properties it has owned for more than 40 years in the now-abandoned 710 surface freeway project corridor; and

WHEREAS, many needed transit projects now in Los Angeles County serve the interests of the region better than a 710 tunnel, which if built, is currently projected not to be completed until 2030; and conducting environmental review of the proposed tunnel would cost an estimated $30-40 million, which could better be spent elsewhere; and

WHEREAS, the cities of Glendale and La Cañada Flintridge oppose construction of a 710 tunnel project, and the City of Los Angeles opposes it within its jurisdiction.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SOUTH PASADENA, CALIFORNIA, DOES RESOLVE, DECLARE, DETERMINE AND ORDER AS FOLLOWS:

SECTION 1. The South Pasadena City Council does hereby rescind Resolutions 6960 and 7134 which contained the City's official position on the SR-710 North Extension.

SECTION 2. The South Pasadena City Council does hereby oppose any proposal, surface or subsurface, to extend the SR-710 freeway from Valley Boulevard in the City of Los Angeles to the 210 freeway in the City of Pasadena, and instead wholeheartedly supports further development of a fiscally and environmentally responsible alternative, that includes elements of a multi-mode transportation system.

SECTION 3. The South Pasadena City Council determines that any extension of the SR-710 North Extension is not worthy of further consideration for a number of reasons: any extension would not reduce congestion in the corridor; it would create significant adverse health impacts on, and possible community disruption to, South Pasadena residents; and the extension's costs would be disproportionately high and not justified in light of other competing transportation and social needs.

SECTION 4. The South Pasadena City Council reiterates its support for further development and implementation of elements of a multi-mode solution that includes but is not limited to an integrated comprehensive network of efficient light-rail, heavy-rail, bus and bicycle systems throughout the San Gabriel Valley. We direct staff to work with other jurisdictions to fund an update of this multi-mode alternative and to submit it to the Federal Highway Administration, Caltrans, and Metro. We further request that this alternative be pursued by the Governor, the California State Legislature, SCAG, Caltrans, Metro and others rather than an extension of the SR-710 North.

SECTION 5. Recognizing that Measure R specifies that $780 million is to be allocated to a 710 tunnel, and that Metro staff will likely recommend that its governing board authorize an Environmental Impact Report on a tunnel, and recognizing that such a study would be extremely costly, the South Pasadena City Council requests Metro and Caltrans to instead contract with an independent research organization, agreed upon by stakeholders in the corridor of the proposed SR-710 North Extension, to conduct a comparative cost-benefit study of the tunnel versus an updated multi-mode alternative that would rely upon transit and mobility improvements.

SECTION 6. The South Pasadena City Council requests that the Governor of California, the California State Legislature, SCAG, Metro, Caltrans, and others work with the City of South Pasadena, the City of Pasadena, and the El Sereno representatives of the City of Los Angeles, and others, to implement a plan for complete and final elimination of the surface freeway alternative, and sale of the surface estate in the corridor.

SECTION 7. Staff is directed to distribute this resolution to all interested parties and urge other cities, elected officials, regional agencies and organizations to support elements of a multi-mode transportation system.

SECTION 8. This resolution shall become effective immediately upon its adoption.

SECTION 9. The City Clerk shall certify to the passage and adoption of this resolution and enter it into the book of original resolutions.

PASSED, APPROVED AND ADOPTED ON this 2nd day of February, 2011.

Mike Ten, Mayor

ATTEST:

Sally Kilby, City Clerk

APPROVED AS TO FORM:

Richard L. Adams II, City Attorney

I HEREBY CERTIFY the foregoing resolution was duly adopted by the City Council of the City of South Pasadena at a regular meeting held on the 2nd day of February, 2011, by the following vote:

AYES: Cacciotti, Putnam, Schneider, Sifuentes and Mayor Ten

NOES: None

ABSENT: None

ABSTAINED: None

Sally Kilby, City Clerk

Crescenta Valley Town Council

www.crescentavalleytowncouncil.org
P.O. Box 8676
La Crescenta, CA 91224-0676
(818) 248-9387
contact@thecvcouncil.com

Cheryl Davis
President

Steve Goldsworthy
Vice President

Danette Erickson
Recording Secretary

Dennis van Bremen
Treasurer

Robbyn Battles
Corresponding Secretary

COUNCIL MEMBERS

Frank Beyt

Robert Thomas

Todd Thornbury

Kim Mattersteig

Charles Beatty, alternate

Silvana Casalegno, alternate

Kevin Kroeker, alternate

March 10, 2010

State of California Department of Transportation
3412 North Eastern Avenue
Los Angeles, CA 90032

Re: SR-710 Tunnel Technical Study, 2010 Community Meetings

Dear Sirs,

The Crescenta Valley Town Council is resubmitting a correspondence submitted in June 2009 with regard to 710 Tunnel project.

Please include this correspondence and the attached as part of the final geotechnical report.

Respectfully,

Cheryl Davis
President

enc: Letter dated June 11, 2009
2 pages

Crescenta Valley Town Council

www.crescentavalleytowncouncil.org
P.O. Box 8676
La Crescenta, CA 91224-0676
(818) 248-9387

Steve Pierce
President

Frank Beyt
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Cheryl Davis
Recording Secretary

Dennis van Bremen
Treasurer

Liz Arnold
Corresponding Secretary

COUNCIL MEMBERS

Grace Andrus

Danette Erickson

Steve Goldsworthy

Robert Thomas

Charles Beatty, alternate

Robbyn Battles, alternate

Joyce Lauterback, alternate

June 11, 2009

California Department of Transportation
District 7
100 S. Main Street
Los Angeles, CA 90012

Dear Sirs,

The Crescenta Valley Town Council is strongly opposed to the 710 Tunnel Project and the technical study which is underway.

While the first letter, sent May 17, 2007, has not had a response, let us be clear in this correspondence. As elected representatives of the unincorporated area in La Crescenta, we have recently held a public meeting in which there was strong opposition to the 710 Tunnel Project. We request that our opposition be acknowledged and filed along with other Foothill Communities.

It is estimated by experts that the 210 freeway thru the Crescenta Valley would bear the brunt of the traffic and congestion resulting from the completion of the 710 tunnel. This is not acceptable to us and we cannot see any type of mitigation that would ease this unequal burden that our community is asked to bear. Congestion, noise, and pollution from the additional traffic is unacceptable to our community.

Additionally, we are strongly opposed to the study in progress. Studying five zones, at an approximate cost of $10 million, is wasteful and irresponsible, with funds that could be better used elsewhere in our state, especially during this time of budget crisis. More consideration should be given to the way taxpayer money is spent and the way taxpayer concerns are addressed. It appears that this project has been decided upon and the "study" is merely a way to waste our money on a project not supported by a majority of municipalities.

Crescenta Valley Town Council

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(818) 248-9387

We support the alternate plan, proposed by Supervisor Michael Antonovich more than ten years ago, which would move containers from LA Ports to an inland site in Lancaster via rail. This would alleviate traffic congestion from many parts of Los Angeles as well as our community.

Sincerely,

Steve Pierce
President

CC:
NEIGHBORING COUNCILS:
City of Glendale
City of La Canada-Flintridge
City of Los Angeles – Neighborhood Council
-Wendy Gruel, Councilwoman

COUNTY OFFICIAL:
Michael Antonovich, Los Angeles County Supervisor

STATE OFFICIALS:
Arnold Schwarzenegger, Governor
Bob Huff, Senator
Carol Liu, Senator
George Runner, Senator
Anthony Adams, Assemblyman
Cameron Smyth, Assemblyman
Paul Krekorian, Assemblyman

FEDERAL OFFICIALS:
Barbara Boxer, Senator
Dianne Feinstein, Senator
Adam Schiff, Congressman
David Dreier, Congressman

ARROYO SECO NEIGHBORHOOD COUNCIL
Adopted - OCTOBER 26, 2009

PROPOSED 710 STATEMENT

The Los Angeles city-certified **Arroyo Seco Neighborhood Council** (ASNC) represents the historic and unique Northeast communities of *Hermon, Monterey Hills, Mount Washington, Montecito Heights,* and *Sycamore Grove* in land use and other local governmental issues. The ASNC is opposed to any form of an extension to the 710 Freeway through the ASNC area if it will result in:

- The loss of homes, businesses, or any existing amenit~~ies in our~~ communities;
- devastation or diminished use of any remaining open areas or green space enjoyed by ASNC stakeholders within our boundaries;
- any compromise of the geological stability of our area;
- further delays in the realization of improved public transportation options for ASNC stakeholders;
- increased traffic on our communities' primary feeder streets as a result of any such extension, whether after any proposed construction or for extended periods during construction;
- more congestion on existing freeways that serve our area's residents, workers, etc;
- heightened noise levels related to re-configured traffic flows;
- placement of ventilation devices that deface the landscape or concentrate pollutants in any of our communities, negatively affecting constituent health;
- or, any other environmental or aesthetic degradation that cannot be mitigated successfully.

Further, the ASNC urges a consideration of alternatives to the 710 "gap closure" that address more precisely the current and future needs of our constituents as well as the rest of Southern California – reducing congestion, improving air quality, increasing connectivity for pedestrians, making our cities more livable – such as:

- Trip Reduction and Transportation Demand Management for autos;
- low-build options to facilitate traffic movement within "the gap";
- a more comprehensive transit network, providing seamless connectivity;
- heavy rail taking freight to more remote hubs for transfer to trucks.

The ASNC keeps its constituency informed through its website: http://www.asnc.us/ as well as its group email: asncalert@yahoogroups.com. As the 710 issue evolves, the ASNC will host public forums to present all sides of the debate and offer a venue for all concerned constituents to become involved.

ARROYO SECO NEIGHBORHOOD COUNCIL
Post Office Box 42254, Los Angeles, Ca90042
Phone (866) LA-HELPS
www.asnc.us

Executive Officers

Michael Larsen
PRESIDENT

Michael Nogueira
VICE-PRESIDENT

Brian Heckmann
TREASURER

Robert Guevara
SECRETARY

Jared Hardy
COMMUNICATIONS & GOVERNMENT RELATIONS OFFICER

CITY OF LOS ANGELES
CALIFORNIA

Antonio Villaraigosa
MAYOR

EAGLE ROCK NEIGHBORHOOD COUNCIL
P.O. Box 41652
Los Angeles, CA 90041

Website:
www.EagleRockCouncil.org

E-Mail:
info@EagleRockCouncil.org

RESOLUTION OF THE EAGLE ROCK NEIGHBORHOOD COUNCIL

The Eagle Rock Neighborhood Council (ERNC) joins other Los Angeles Neighborhood Councils in opposing the building of an SR-710 toll tunnel (often referred to as the 710 North Extension). We oppose this project and any other freeway building measures through the Northeast Los Angeles area, as the building and presence of such a tunnel close to Eagle Rock would adversely affect our residents.

Our opposition arises out of concern for our citizenry's health, safety, quality of life, and the most certain destruction of, and disruption to, the cohesive, historic neighborhoods of Northeast Los Angeles.

We are convinced that building such a tunnel:

1) would decimate neighborhoods beyond recognition, dislocate many of our citizenry, and disrupt life for those remaining for over a decade;

2) is not intended to benefit the citizens of Eagle Rock but instead is intended to bring freight trucks through our area from the ports of Long Beach and Los Angeles;

3) would clog our existing freeways with around-the-clock freight truck traffic, making our freeways both dangerous and impassible;

4) would put the health of our citizenry, and especially our children, at risk from massively increased exposure to diesel fumes;

5) that the multi-billion-dollar cost for building and maintaining it would ultimately be passed back to California taxpayers.

We see no benefit to our neighborhood, and indeed our whole region, and we urge those promoting this project to implement alternative solutions to port freight problems, and a more integrated transport system for local traffic, which would be horrendously complicated by such a toll tunnel. Other solutions exist; we urge that they be utilized.

Passed and Approved Unanimously by Eagle Rock Neighborhood Council this 7th day of December, 2010.

Michael Larsen
President - Eagle Rock Neighborhood Council

GLASSELL PARK NEIGHBORHOOD COUNCIL OFFICERS

CHAIRPERSON
Joseph Elkins

VICE CHAIRPERSON
BARDLEY

SECRETARY
Philip Iglauer

TREASURER
Maggie Darett-Quiroz

CALIFORNIA

www.glassellparknc.com

GLASSELL PARK NEIGHBORHOOD COUNCIL

3750 N. Verdugo Road
Los Angeles, CA 90065

TELEPHONE: 323-256-4762

Art Camarillo, Office Manager

To Whom It May Concern:

At it's regular monthly stakeholder meeting of September 15, 2009, the Glassell Park Neighborhood Council Board unanimously voted to support the Glassell Park Improvement Association's position regarding the 710 Tunnel Extension as follows:

We the undersigned oppose the proposed 710 tunnel extension through Northeast L.A. A project of this magnitude should be approached with caution, considering the enormity of the impacts on the communities involved. While our opposition is directed to the tunnel extension through our neighborhoods, our concern is for an efficient transportation system for the entire region that includes a multi-modal low-build approach.

Sincerely,

Joseph D. Elkins

Chair

CITY OF LOS ANGELES

CALIFORNIA

HISTORIC HIGHLAND PARK NEIGHBORHOOD COUNCIL
POST OFFICE BOX 50791
LOS ANGELES, CA 90050
TELEPHONE: (323) 256-8921
http://www.historichighlandpark.org
Certified as NC #33 MAY 28, 2002

EXECUTIVE BOARD
Chris Smith PRESIDENT
Lisa Brewer FIRST VICE-PRESIDENT
Rick Marquez SECOND VICE PRESIDENT
Mark Reback TREASURER

C/O Department of Neighborhood Empowerment
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To:
Mayor Antonio Villaraigosa
Los Angeles City Council Members
Los Angeles City Hall
200 N. Spring St.
L.A., CA 90012-4801
November 18, 2010

Resolution Against the SR-710 North Gap Closure
The 710 Tunnel

The Historic Highland Park Neighborhood Council would like to express our strong objection to the building of any extension of the 710 freeway whether a surface or tunnel route. We have become familiar with this CalTrans and MTA project for several years through our Land Use Committee. The HHPNC Board discussed this matter, studied the current information, and voted to approve this Resolution.

We join the Cities of Glendale, South Pasadena, and La Canada Flintridge, the Neighborhood Councils of Arroyo Seco, Glassell Park, and Sunland Tujunga, as well as many other community groups, and government entities in urging the Los Angeles City Council to take a stronger stand against this destructive, ineffective project, currently estimated to cost in the range of $14 billion.

A tunnel will increase, rather than decrease, congestion. Cars will remain on surface streets to avoid driving in a no-exit pollution filled 5-mile tunnel with trucks, through earthquake and flood zones, with an estimated toll of $15.

Studies at USC and UCLA show the pollution will be concentrated at the entrance and exit of the massive tunnel. Drivers inside the tunnel will be subjected to lethal fine-particulate pollution, one thousand times more concentrated than in outside air. This poisonous tunnel pollution will be vented directly into our neighborhoods. Where pollution increases, so does disease.

Construction of similarly large tunnels has been plagued with failures and scandals. According to MTA, sinkholes and collapse are inevitable. Fires, collapse, and flooding are not uncommon in large tunnels such as in the notorious Big Dig in Boston

The high-quality jobs to build this tunnel will go to foreign workers, and managers experienced with the gigantic machines able to dig tunnels this big, not to the construction workers, designers, and engineers of Los Angeles.

Spectacular cost, increased congestion, increased disease, years of disruption, few jobs for Los Angeles - what could we accomplish with a tenth of that funding put into proven street design, electric heavy rail for freight, and light rail for people, built in Los Angeles by the people who live here?

Help us implement the 21st Century solutions available now, technologies worthy of the modern, forward-thinking, innovative city Los Angeles claims to be. Let us not get trapped in old solutions.

We do not support this project.

Sincerely,

Chris Smith, President
Historic Highland Park Neighborhood Council

Sunland-Tujunga Neighborhood Council

IMPROVING THE QUALITY OF LIFE IN SUNLAND TUJUNGA

7747 Foothill Blvd., Tujunga, CA 91042 • www.stnc.org • 818-951-7411 • FAX 818-951-7412

March 25, 2011

Ron Kosinski
CALTRANS
100 South Main Street, MS-16A
Los Angeles, CA 90012

VIA EMAIL: (ron_kosinski@dot.ca.gov)

RE: SR-710 GAP CLOSURE PROJECT, SCOPING COMMENTS

Dear Mr. Kosinski,

The Sunland-Tujunga Neighborhood Council voted unanimously on June 8, 2010 to formally support our Foothill area neighbors in opposing the proposed extension of the SR710 Freeway expansion to the 210 Freeway. Our vote also included opposition to the possible destruction of 500 homes in the El Sereno community. We are also very much against the unjustified and unnecessary expense of the proposed tunnel which is just one of our many objections to the proposal.

Our community believes that our government's funds would be better spent investing in real rapid transit, such as a rail system, instead of the proposed freeway extension, which are only a band aide and not a solution to our growing transit problems, as cities will continue to grow. The proposed extension will only rapidly increase traffic through the foothill communities bound by the 210 freeway and not resolve the transit problem.

Sunland-Tujunga's goal is to protect our historical community, known for decade's world wide, for its' clean air that provides a safe haven from bad air quality for people around the world with respiratory diseases. The toxic air caused by the stop and go emissions from additional vehicles will create new health problems and will adversely affect persons who came here because of serious health issues. The freeway extension will destroy the environment that makes Sunland-Tujunga a health haven and will probably cause these people to move elsewhere in order to continue breathing freely.

From a safety point, Sunland-Tujunga's logistics leaves us with only two ingress and egress roads in and out of our community. In the event of a Natural Disaster such as an earthquake or fire, the Foothill Freeway is one of the only two routes in and out of our community. Today, when there is an accident on the 210, which happens quite often, Foothill Blvd, our only other throughway is used as an alternate route and becomes jammed and practically at a standstill for hours making it a difficult task for local First Responders, as well and causes them to lose precious minutes to handle emergencies in our community in a timely manner. This is dangerous for our community members.

We suggest that the Transportation Committee go back to the drawing board and come up with more sustainable solutions to resolve the traffic issue. A study of the following suggestions would be a good start.

- Using the rails to transport goods across the county to a central warehouse in the desert as suggested by Supervisor Antonovich
- Install a light rail system as a workforce connector to and from the harbor area to the foothills and give tax credits to companies or their employees who use the system. This would cut down on emissions from heavily increased vehicle traffic.

We look forward to working with you to come up with a proposal that our entire community will welcome and support.

Respectfully,

Sunland-Tujunga Neighborhood Council

Dan McManus
President

Cc: Paul Krekorian, Council District 2
Bill Rosendahl, Chair, LA City Transportation Committee
Council President, Eric Garcetti, City of Los Angeles
Los Angeles Department of Transportation
Will Kempton, Director, CALTRANS
Doug Failing, District 7 Director, CALTRANS
Federal Highway Administration, California Division, 980 N. Street, Suite 400, Sacramento, CA 95814-2724

The GPIA respectfully submits its opposition to the proposed Interstate 710 tunnel extension through Northeast Los Angeles. A project of this magnitude should be approached with caution, considering the enormity of the impacts on the communities involved. While our opposition is directed to the tunnel extension through our neighborhood, our concern is for an efficient transportation system for the greater Los Angeles area and throughout Southern California.

First, we feel that the greater good of this route necessitates a complete transportation study. Clearly, the primary intent of this gap closure is to further move goods from the ports of Los Angeles and Long Beach. We feel, however, that any plan for such movement of goods should take into account all possible modes of transportation, including rail and air. The information that has been gathered to date on this topic does not appear to be current.

Next, the use of a tunnel to extend the incomplete 710 freeway seems counter-intuitive in Los Angeles. We have already seen first-hand the dangers that even a much shorter tunnel have caused truck traffic along I-5 Southbound at the CA-14 interchange. The construction of the MTA Red Line tunnel also resulted in some destruction. Construction of a tunnel of this diameter and length raises safety concerns that would immediately affect the thousands of residences that would sit atop any such tunnel.

The current economic situation also provides for concern. Simply put, the billions of dollars needed for total completion of all phases of this project, including ongoing maintenance, do not seem to make for a worthwhile project, especially in the greater scope of the regional transportation scheme. Other routes already exist for the long-haul movement of goods via trucks throughout Los Angeles. It seems that perhaps providing a more economic means of moving commuters through this corridor may be necessary.

Finally, any northern portal for an Interstate 710 tunnel will likely cause the destruction of whatever community in which it emerges. This is especially true in Zones 1 and 2, in which either Cypress Park (Zone 1) or Glassell Park (Zone 2) could literally be wiped off the map with the construction of a tunnel portal and any connector ramps from one freeway to another.

As indicated, the Glassell Park Improvement Association has formally voted to oppose construction of an I-710 tunnel extension through our community. We encourage further study of all possible transportation solutions throughout the Southern California region in its place.

Resolution in Support of the Glendale City Council's position on the 710 Extension project

The 710 Freeway extension has been a controversial issue for the past 60 years. The current Cal Trans project to study five possible routes for a tunnel from the current terminus of State Route (SR) 710 in Alhambra to the 5, 2, 210 or 605 Freeways is of great concern to the residents of the Crescenta Valley.

When the 210 Freeway was built in the 1970s the character of the Crescenta Valley changed with the increased traffic. Each subsequent extension of the 210 has brought more noise and pollution yet has failed to ease the traffic burden. Much of the Southern California freeway grid proposed during the Eisenhower Administration was never built. Subsequent mass public transit projects and developments in shipping and rail transport of freight have made the highway plan obsolete.

The City of South Pasadena proposes several upgrades to existing streets and freeway on and off ramps, plus upgrades to bus and Metro Rail service as a cheaper, faster, and better alternative. The millions of dollars proposed for the 710 tunnel study and subsequent lengthy Environmental Impact studies would be better spent on these alternatives that lead to more sustainable transportation policies.

On July 28, 2009, after much discussion, the Glendale City Council voted to oppose any extension of SR 710, surface route or one of the five tunnel locations being studied.

The Far North Glendale Homeowners group of the Crescenta Valley Community Association supports the Glendale City Council in opposition to this project and requests the support of the Glendale Homeowners Coordinating Council on this issue critical to regional transportation.

RESOLUTION NO. 22-09-10

A RESOLUTION OF THE LA CAÑADA UNIFIED SCHOOL DISTRICT OPPOSING THE TUNNEL ALTERNATIVE TO THE EXTENSION OF THE SR-710 FREEWAY BETWEEN THE I-10 AND THE I-210 FREEWAYS AS WELL AS THE STATE-ADOPTED SURFACE ALTERNATIVE AND CALLING ON METRO, CALTRANS AND SCAG TO FIND NEW AND EFFECTIVE ALTERNATIVES TO RESOLVE CONGESTION

WHEREAS, surface streets in Alhambra, South Pasadena and Pasadena between the I-10 and the I-210 suffer from significant congestion as do all southern California freeways; and

WHEREAS, a viable regional solution for this congestion must be found; and

WHEREAS, in 1959, the State of California adopted the highway surface route (the "surface alternative") extending north from the SR-710 freeway to the I-210 freeway; and

WHEREAS, the City of South Pasadena, has filed many objections, injunctions and lawsuits in an ongoing dispute over the surface alternative; and

WHEREAS, in 2002, the California Department of Transportation (Caltrans) and the Federal Highways Administration (FHWA) determined that consideration of a tunnel as an alternative to the surface alternative was appropriate; and

WHEREAS, in 2006, the Los Angeles County Metropolitan Transportation Authority (Metro) released its "Route 710 Tunnel Technical Feasibility Assessment Report," declaring the tunnel to be a "feasible" alternative and stating that environmental considerations could be "minimized, eliminated or mitigated;" and

WHEREAS, the City of La Cañada Flintridge submitted comments and objections to Metro, stating, in part, that there was insufficient evidence in the report to make such a finding, and the study, as well as its conclusion was flawed, since very little environmental study was conducted; and

WHEREAS, in 2007 and 2008, the Southern California Association of Governments (SCAG) and Metro individually included the tunnel as a priority project within their adopted Regional Transportation Plans, thereby demonstrating that the potential project had been chosen as the primary, as well as the most costly, project to resolve the congestion problems which exist in the subject region; and

WHEREAS, in 2008, Caltrans and Metro began their "SR-710 Tunnel Technical Study," a study which was to be "route-neutral" and which would study technical feasibility, particularly geotechnical feasibility; and

WHEREAS, the "SR-710 Tunnel Technical Study" final draft was completed in March 2009 with the City submitting comments and objections to Caltrans and Metro regarding this study, stating in part, that the study does not contain sufficient review of the information obtained; and

WHEREAS, in 2008, Metro passed an ordinance to place Measure R on the ballot, including a proposed allocation of $780 million for the tunnel, even though the proposed tunnel project had not undergone proper California Environmental Quality Act (CEQA) review. The Measure was subsequently approved by the voters by a narrow margin; and

WHEREAS, based upon the SCAG "SR-710 Missing Link Truck Study" (Preliminary Final Draft) (released in 2009); if the tunnel is completed:

(1) 75% of local surface streets would still be gridlocked, operating over capacity with severe congestion, with at least twelve arterial streets experiencing higher traffic volumes solely due to the tunnel
(2) the tunnel would cause significant detrimental traffic and truck impacts on the I-210 freeway through the cities of Glendale, Pasadena, La Cañada Flintridge and the community of La Crescenta (more than a 25% increase in daily volumes on I-210; an additional 30,000 vehicles per day on I-210; 850 additional trucks in the PM peak hour on I-210; truck percentage will increase from 11% to over 20%); and since portions of the I-210 will operate at Level of Service (LOS) F, traffic will be forced onto local streets; and
(3) the tunnel connection would make overall driving conditions worse regionally (motorists would be driving farther and spending more time on the road); and

WHEREAS, based upon the Metro "Route 710 Tunnel Technical Feasibility Assessment Report" (2006), the tunnel is projected to be gridlocked soon after completion; and

WHEREAS, based upon a variety of University of Southern California (USC) studies, including the USC California Children's Health Study, due to a lack of substantive reduction of gridlock (as found by other studies), most of the residents south of the tunnel would continue to be impacted by respiratory problems associated with pollution. In addition, the residents along the I-210 freeway would have increased gridlock, and experience an increase in respiratory problems, particularly affecting the lungs of children and other residents along the freeway; and

WHEREAS, the La Cañada Unified School District (LCUSD) has multiple school sites located adjacent to the I-210 freeway; and

WHEREAS, additional truck traffic and increased pollutants on the I-210 freeway would add risk to the health of children attending schools near the I-210 freeway; and

WHEREAS, the projected cost to design and construct the tunnel is several billion dollars; and

WHEREAS, this project is out of proportion and far exceeds the small or nonexistent public benefit that would be derived from this project;

NOW, THEREFORE, BE IT RESOLVED, that the LCUSD Governing Board opposes any approval or expenditure of funds related to the proposed SR-710 tunnel project and the state-adopted surface alternative, neither of which have passed CEQA review, and finds that both alternatives are ineffective, 20th-century solutions for the existing regional congestion problems, which require 21st-century solutions.

BE IT FURTHER RESOLVED that the LCUSD Governing Board calls on Metro, Caltrans and SCAG to find other new, effective alternatives to these projects, including those alternatives using rail as the mode of transportation, which will truly solve the region's congestion problems.

PASSED, APPROVED and ADOPTED this 22nd Day of June, 2010

AYES: 5
NOES: 0
ABSENT: 0

Susan Boyd, Governing Board Clerk

Huntington Hospital

Huntington Memorial Hospital
100 W. California Boulevard
P.O. Box 7013
Pasadena, California 91109-7013
(626) 397-5555 FAX (626) 397-2995

Stephen A. Ralph
President
Chief Executive Officer

March 14, 2011

Mr. Ron Kosinski
Deputy District Director
Division of Environmental Planning / Caltrans, District 7
100 S. Main Street, MS 16A
Los Angeles, California 90012

RE: SR-710 Environmental Impact Report / Scoping Requests

Dear Mr. Kosinski:

On behalf of Huntington Memorial Hospital, I wish to formally request the following elements be included in the SR-710 Environmental Impact Report:

- Designate Huntington Hospital as a sensitive receptor
- Conduct a hot spot analysis of air quality at and around Huntington Hospital
- Conduct a health impact/health risk assessment at and around Huntington Hospital

These elements should be included in the scope of the EIR in order to appropriately assess the impact of gases and other particulates that will be exhausted from the ventilation towers to be located immediately west of the hospital's campus.

We are, of course, concerned about the safety of our patients, employees and visitors, and we believe this information will be important in determining the full effect of the proposed project on Huntington Hospital and its surrounding neighborhoods.

Thank you for your consideration.

Sincerely,

Stephen A. Ralph
President and Chief Executive Officer

cc: Bill Bogaard
Steve Madison
William Sherman, M.D.
Jane Haderlein

Ben Schreiber
Tax Analyst
Friends of the Earth
1100 15th Street NW
11th Floor
Washington, DC 20005

December 8th, 2010

Mayor Ara Najarian
500 N. Central Ave., #940
Glendale CA 91203

Dear Mayor Najarian,

On behalf of our activists and members we want to thank you for your leadership in opposition to the I-710 extension. We strongly support your call to conduct a financial cost analysis before moving forward with an environmental assessment of the I-710 expansion project. In these times of financial belt tightening taxpayers should know the full cost of this massive project before spending $60 million or more conducting an environmental assessment. This is especially true for a flawed project such as this that is expensive, harmful to the environment and not a long term solution to congestion.

For well over a decade I-710 (or SR-710 as it was known originally) has been a poster child for wasteful spending that is harmful to the environment. The only thing that has changed in that time is the cost. Now estimated to cost $11.8 billion, I-710 was again featured as a prime cut in the report *Green Scissors 2010* that I co-authored in July.

Cheaper and cleaner alternatives exist. Alternatives include multi-load/low build, increasing rail transit, bike lanes, installing clean electric rail systems for moving freight from the ports to inland distribution centers. Adding new road miles only worsens- California's, and the entire country's, fiscal crisis and exacerbates our climate crisis too.

Sincerely,

Ben Schreiber
Tax Analyst
Friends of the Earth

Chairman of the Board Don Knabe
Los Angeles County Metropolitan Transportation Authority
Los Angeles, CA 90012

Dear Chairman Don Knabe,

Taxpayers for Common Sense is an independent and non-partisan voice for taxpayers, and for this reason we support a thorough re-analysis of the estimated cost to build the 710 gap closure. The cost estimates related to this project have varied so widely over the years as to be almost useless; but with some estimates running as high as $12 billion, the public has the right to know what it will cost to build in today's dollars before moving forward with any other aspect of the project.

Taxpayers for Common Sense has been watching the 710 project for many years, and included it in our *Road to Ruin* report of the most wasteful transportation projects in the nation in 2004. Now that the tunnel option has come to the forefront, our concerns have only increased, leading us to include it in our most recent *Green Scissors* report, released earlier this year in collaboration with a number of environmental and consumer groups, as a potentially wasteful project that will harm taxpayers and the environment. We remain deeply concerned that despite assurances that this project will be built with private dollars, it is federal taxpayers who will pick up the tab if decisions to proceed are based on a flawed financial analysis.

Over the years, our skepticism regarding this project has increased right alongside the projected cost. The potential magnitude of this project is unlike any tunnel project previously constructed in this country, making it absolutely necessary that all parties be protected by entering into any decisions with eyes wide open. At the basis of this will be a thorough and accurate cost estimate.

We strongly support the proposed resolution and urge its adoption by the Metro Board of Directors. Only then will decision-makers and the public have the information necessary to make further decisions about how to proceed.

Sincerely,

Erich Zimmermann
Senior Policy Analyst
Taxpayers for Common Sense

GREEN SCISSORS 2010

MORE THAN **$200 BILLION IN CUTS** TO WASTEFUL AND ENVIRONMENTALLY HARMFUL SPENDING

INTRODUCTION

Since its inception fifteen years ago, the Green Scissors Campaign has fought to make environmental and fiscal responsibility a priority in Washington. By eliminating subsidies and programs that both harm the environment and waste taxpayer dollars, the federal government can protect our natural resources while reducing the growth of government spending and making a significant dent in the national debt. *Green Scissors 2010* identifies more than $200 billion in wasteful government subsidies that are damaging to the environment and harmful to consumers.

Now more than ever, this campaign is critical — the country faces deficits not seen since World War II. Spending levels continue to rise: from the stimulus to defense, from healthcare to energy. The Congressional Budget Office (CBO) has forecast a $1.3 trillion deficit for fiscal year 2010. The deficit and $13.1 trillion debt have not gone unnoticed by the President, Members of Congress, and the public, many of whom have called for fiscal restraint in Washington. In fact, the Administration has recently asked for agencies to identify their worst performing programs and called for a 5 percent reduction from every non-security governmental agency, and Republican leadership has started the *You Cut* program that lets taxpayers identify spending cuts that they would like to see.

To get our nation's spending in check, tough choices will need to be made in many areas, including energy and natural resources. The good news is there are plenty of cuts and reforms that will benefit both the environment and the country's bottom line. We need to eliminate wasteful programs and policies-they not only cost us upfront, but create additional financial liabilities down the road and threaten our nation's fragile land, air and water.

From the more than a century-old 1872 Mining Law that gives away federal land at $5 an acre, to $53 billion in lost oil and gas revenues from royalty-free leases given away in the late 1990s, to the $5.4 billion per year ethanol tax credit; there are dozens of reforms that can bring in hundreds of billions in valuable taxpayer revenue while helping to address our nation's top environmental priorities.

The list of cuts is long, and tackling them will require taking on some of the world's richest and most powerful corporations. The President and Congress must get tough with the special interest groups that are raiding our treasury and jeopardizing our valuable natural resources. We know it is not going to be easy; we need real leadership now more than ever.

A Guide for Lawmakers

The Green Scissors 2010 report targets four major areas as places for prime cuts: Energy, Infrastructure, Agriculture and Biofuels, and Public Lands. Each section provides an overview, a summary of the spending cuts and a chart of recommended subsidy cuts. Undoubtedly there are more cuts that could and should be made, but this report is a first step to restoring fiscal sanity while also protecting our environment. We call on Congress to use this information to make the important cuts that will restore our nation's fiscal and environmental health.

Transportation

The nation's transportation program is broke. The gasoline tax that each of us pays at the pump falls far short of the amount needed to maintain the nation's road and transit systems. As a result, Congress has transferred billions of dollars in the past two years from the U.S. Treasury into the Highway Trust Fund so that states and local governments can continue to spend on transportation projects. There are a number of proposed cuts to transportation spending that would help cover this shortfall.

The President's fiscal year 2011 budget cuts the $293 million Surface Transportation Priorities Program.[11] This program is funded entirely by Congressional earmarks and supersedes merit-based state and local decision making. There are House and Senate proposals to rescind unused transportation earmarks that passed at least 10 years ago, which would save as much as $713 million immediately and more in the future.[12] A final area of possible transportation cuts is individual projects. The following chart contains transportation programs and a sampling of projects that should be eliminated to save taxpayers billions.

11 "Terminations, Reductions, and Savings" in Budget of the U.S. Government: Fiscal Year 2011. Page 51.

12 http://feingold.senate.gov/record.cfm?id=322763 and http://betsymarkey.house.gov/News/DocumentSingle.aspx?DocumentID=197995

Selected Highway Projects	Potential Cuts ($)
I-710 Tunnel Project	11,800,000,000
Knik Arm Crossing	1,500,000,000
Surface Transportation Priorities (over 5 years)	1,465,000,000
Rescind unused transportation earmarks	713,000,000
St. Croix River Crossing Project/Stillwater Bridge	668,000,000
Juneau Access Road	500,000,000
Outer bridge portion of Ohio River Bridges Project	378,000,000
Gravina Island Access	304,000,000
TOTAL	17,328,000,000

HIGHWAY TRUST FUND

Uncle Sam collects the federal gas tax and deposits the proceeds into an account called the Highway Trust Fund (HTF). This revenue pays for the construction and upkeep of the nation's transportation systems. Over-spending by Congress and the current structure of the fund have created a perfect storm that has the HTF on life-support.

When it became clear last year that the transportation program was in serious trouble, Congress responded by throwing billions of tax dollars at it to prop it up. In less than two years, Congress has approved the transfer of some $34 billion in general tax revenues to the HTF to keep it solvent and reversed an $8.7 billion rescission mandated at the expiration of the last highway bill. Yet all that spending does nothing to fix the fund's underlying problems. Without a massive increase, the gas tax alone will still not be sufficient in the years ahead to maintain our transportation infrastructure at a safe and efficient level and feed the seemingly endless congressional appetite for highway pork.

General fund transfers to the HTF must stop. Congress should balance the amount coming into the fund with what is spent from the fund. This will require increasing revenues (options include allowing additional tolling, increasing the federal gasoline tax, or converting to an alternative taxing mechanism such as a vehicle miles traveled tax), decreasing spending (options include reducing funding for unneeded transportation projects, getting rid of the billions in transportation earmarks, changing the federal match for new construction projects) or some combination of both.

ANGELES CHAPTER · SIERRA CLUB
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For Immediate Release
December 16, 1997

Contact: Stanley Hart
(626) 791-9348

The Sierra Club Position on the 710 Freeway

Urban freeways are a costly, tragic failure.

Under construction for fifty years, Los Angeles freeways represent a public investment of $125 billion -- $250 million per mile, in today's dollars. In addition, the traveller must purchase and operate his own vehicle; parking must be provided. Despite this huge outlay, freeways are notorious for fostering congestion, air pollution, death and injury.

Not only have freeways failed to provide safe, convenient, inexpensive transportation, they have generated sprawl which has given Los Angeles a worldwide reputation for inefficiency. By destroying our rail transit networks, the freeways have created ghettos where poor and minorities, unable to purchase cars, are denied reasonable access to jobs, education.

The electorate has voted twice to tax itself to build essential mass transit infrastructure; it has never voted approval of freeway expenditures. Yet, the transit budget has been suspended and plans to build yet another freeway move forward. The establishment has turned the world on its head. The absurdity of the freeway system is perpetuated.

We have long known that increasing freeway capacity simply generates more trips by more drivers. New freeways do not reduce congestion; they increase congestion. They do not reduce air pollution; they add to it. We now have research and hard data which confirms these observations. Highway bureaucrats, however, have chosen to ignore this truth. Highway advocacy has, thus, been transformed into highway ideology. The bureaucrats, and the special interests which profit from their projects, continue to depend on the old myths. Denial permits continuation of careers. But bureaucratic denial is remarkably costly for Los Angeles. Freeway commuting absorbs 25% of Los Angeles incomes. It is costly in many other ways:

- 2,000 fatalities annually; hundreds of thousands of injured.
- air pollution, ozone depletion and generation of greenhouse gases.
- personal savings rates are inadequate to accumulate essential investment capital.
- 40% of land surface devoted to parking and operation of cars and trucks.

The Sierra Club opposes new expenditure of public funds for additional freeway capacity, including the 710 extension and all HOV lane projects, because they are not cost-effective and are detrimental to the community as well.

****

NRDC
THE EARTH'S BEST DEFENSE

NATURAL RESOURCES DEFENSE COUNCIL

June 16, 2010

Via U.S. Mail

Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Re: Huizar and Katz Motions Regarding SR-710 North Environmental Review Process

Dear Chair Najarian and Metro Board Members:

On behalf of the Natural Resources Defense Council ("NRDC") and its tens of thousands of members who live and work in Southern California, we are writing to express our **support** for Director Huizar's motion, and our **conditional support** for Director Katz's motion, pertaining to the SR-710 North environmental review process.

A surface route for the SR-710 North would have significant adverse environmental impacts and would be extremely disruptive to the community. In 1999, a federal District Court found the environmental review of the surface route to be deficient for its failure to identify all adverse environmental impacts under NEPA. Relying on that decision, both the Federal Highway Administration and Caltrans withdrew their environmental approvals of a surface route. Because CEQA only requires an analysis of alternatives that *reduce* adverse impacts, the EIR process need not include a surface route alternative.

We understand that the Board's legal counsel is advising the Board that it will be legally vulnerable if the surface route is deleted at this time, but we are confident that is not the case. The existence of the prior environmental review shows that the surface route would *increase*, not decrease, impacts, and thus review of it would not further CEQA's purpose of reducing adverse impacts. We therefore support the Huizar motion, which would eliminate the surface route from the EIR process.

In addition, we believe that the provisions in the Katz motion would enhance the environmental review process and ensure a better overall outcome. The proposal would include affected communities and other stakeholders in studying a broad range of non-tunnel alternatives, while ensuring that the costs of each alternative are weighed against its benefits. However, the motion's focus on addressing the so-called "SR-710 north gap

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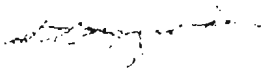
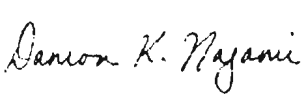
closure" is too narrow. The alternatives analysis should focus more broadly on improving mobility across the entire San Gabriel Valley, rather than just the area around the SR-710 North connection. We recommend modifying the purpose and need description in Paragraph A of the Katz motion accordingly.

Finally, on a related note, we are disappointed that the CEQA lawsuit involving this project (*South Pasadena v. Metro*) has not yet settled. If settlement discussions ultimately fail, we may become involved in that litigation on appeal, either through intervention or as an *amicus*.

Thank you for your consideration of our views.

Very truly yours,





Joel Reynolds
Director, Urban Program

Damon Nagami
Staff Attorney

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

OFFICE OF THE
REGIONAL ADMINISTRATOR

August 22, 2000

The Honorable Adam B. Schiff
California State Senate
PO Box 942848
Sacramento, CA 94248-0001

Dear Senator Schiff:

Thank you for your letter concerning the proposed 710 freeway extension. You raise important questions about the project and statements being made about it. We will attempt to clarify the situation as you request.

As we understand it, there are claims that the 710 freeway extension would have positive air quality benefits and therefore is critical for demonstrating transportation conformity in the South Coast Air Basin. There are also claims that if the 710 extension is not built, transportation conformity could not be met thus resulting in the loss of federal transportation dollars. These claims are not true.

The main question is whether not building the 710 hurts Southern California Association of Governments' (SCAG) ability to demonstrate that the Region's Transportation Improvement Plan conforms with the South Coast Air Quality Plan (i.e. conformity). Our view is that it does not affect conformity. The conformity regulations require that the emissions analysis for a region include all the projects and policies being proposed (see, e.g. 40 CFR 93.122(a)). Only by analyzing the entire set of proposed projects and policies in the context of the overall transportation system can regional air quality impacts be determined. In SCAG's case, there are huge numbers of projects and a vast transportation system to consider. Therefore, a single project is very unlikely to help meet the emissions budgets in order to show conformity. Moreover, any claims of air quality benefits of the 710 project are questionable because the proponents have not adequately considered long term impacts.

We hope that this information answers your questions. We have discussed this issue with the Federal Highway Administration. If you have any further questions or we can assist you in any other way, please contact Mark Brucker of my staff at (415)744-1231.

Yours,

Felicia Marcus

Felicia Marcus
Regional Administrator

cc: SCAG, Charles Keynejad
FHWA, Jean Mazur
Caltrans, Sharon Sherzinger

THE SOUTH I-710 EXPANSION & THE NORTH SR-710 EXTENSION ARE ONE PROJECT

Caltrans and Metro continue to deny that the Expansion of the I-710 South is unrelated to the Extension of the SR-710 North. The segmenting of the two projects is a method by which the agencies will avoid studying the environmental impacts of the whole region and the detrimental increase of port truck traffic throughout. Also a consideration, is the necessity for the High Desert Corridor, a proposed highway project whereby trucks will be able to cut across the Antelope Valley more directly. This project re-confirms that Caltrans and Metro's preferred method of moving goods in the future, will continue to be truck container transport. It is also curious how the trucks are intended to get to this location.

Therefore, the No 710 Action Committee **insists** that Metro and Caltrans:

Admit that both the I-710 South Expansion and the SR-710 North Extension projects are connected and that the sole purpose for new construction is to create a truck route from the Ports of Los Angeles and Long Beach to regions north and east

Acknowledge that the push for the 710 Freeway completion is for regional goods movement as stated by leaders in transportation

Confess that Zone 3, the original Meridian Route, has already been chosen as the preferred route for completion of "the gap", as stated by Gloria Molina at the December 9, 2009 Metro Board meeting

PORT GROWTH

The I-710 freeway was originally designed as a route for the ports, beginning at the Long Beach/San Pedro complex and ending at the SR-134 and I-210 interchange. This route was intended to be a bypass for the downtown Los Angeles area.[1] Over time, the addition of other freeways surrounding Downtown, soon fulfilled this role, and the completed portion of I-710 was used as a connector to those freeways. The unfinished "gap", became no longer necessary.

Today, the motivation behind the expansion and extension of the 710 freeway comes directly from the Ports of Los Angeles and Long Beach. These two ports have grown significantly since the 1940s and are now responsible for 40% of all import shipments to the United States. The rest of the containers come through other ports on the east and west coasts but this will likely change in the future. However, it is estimated that 70% of the shipments that do arrive in Los Angeles are primarily transported by truck to destinations outside of the city.[2] These trucks are crowding our freeways and clogging our surface streets, and it will only get worse.

By the year 2030, the Ports are expected to increase their daily cargo container shipments to over 92,000, a triple increase from 2005 figures.[3] As a result, shipping interests have applied enormous pressure[4] to widen the southern end of the I-710 and to extend the freeway northward to serve their needs as a major goods-movement corridor. In 2007, a Financial Planning Charrette by the USC Keston Institute reported, "Traffic estimates indicate that the tunnel would immediately attract significant traffic between the port area and Los Angeles heading toward major national distribution centers in San Bernardino County." [5]

In 2004, Governor Schwarzenegger was "criticized by government and business leaders in Asia for allowing congestion at the San Pedro Bay Ports to impede the flow of goods from Asia to U.S. markets. On his return he tasked BT&H Secretary, Sunne Wright McPeak with developing a strategy on this issue." [6]

The plans put forth by the Metropolitan Transit Authority (Metro) and California Department of Transportation (Caltrans) to handle the expected port growth in the next few decades, still relies on goods movement by truck and diesel trains. The first stage involves widening the southern portion of the 710 to fourteen lanes. The second step is to add the five-mile tunnel, likely along the Meridian route, and narrow the lanes down to six. Both of these plans are in the environmental stages and are fully supported by the Ports themselves and by some city jurisdictions not directly impacted by the increased traffic the 710 will carry. The growing concern by area residents has now turned to outrage as Metro and Caltrans continue to move toward a solution that is irresponsible and cruel. The high level of air pollution that is currently being produced by diesel fuels, tires on pavement and brake systems[7] will only worsen through increased truck traffic in the area. Per a government report, cargo trucks cause more road damage than cars. "Road damage from one 18-wheeler is equivalent to 9,600 cars."[8]

There is a direct connection between the health of people in the surrounding communities and port operation pollution. In 2007, the California Air Resources Board (CARB) released a Health Risk Assessment[9] that showed that "the residents of the Ayers-Leonis and nearby Bandini neighborhoods (near the BNSF Hobart rail yard in the city of Commerce) face a cancer risk that is 70 percent to 140 percent greater than normal." This was tied directly to the statement that "trucks going into the yards, locomotives, and cargo-handling equipment are the major sources." [10]

In addition, the Los Angeles Times recently reported that 40 Wilmington schools will be outfitted with air filters due to a 2008 settlement negotiated by the National Resources Defense Council and the City of Los Angeles. The action was a result of state and federal studies, linking port pollution to an increase in asthma rates in children. "In five communities around the ports, 21.9% of children suffer from asthma, compared with 15.6% in the Los Angeles region and 14.2% nationally."[11] Environmental groups supported the installation of the filters but noted that the move did not protect children on the playground or when they are not at school. It is critical that pollution be addressed at its source.

Pressure on our freeway systems needs to be relieved, not intensified. To paraphrase Albert Einstein: "The significant problems we face cannot be solved at the same level of thinking we were at when we created them."[12] More polluting cargo trucks are not the answer. We need to design an intelligent infrastructure comprised of multiple solutions that as a whole speeds up not only cargo movement but also frees up the existing freeway systems for cars.

One aspect of a Multi-Mode solution that addresses the cargo movement problem includes a better sorting system located directly at the ports and a zero emission grade separated transportation system to get the cargo out to an "inland" port, also known as an intermodal logistics complex. An example of such an intelligent system to sort and store containers has been proposed by SkyStorage Systems, a company who also has plans for a grade separated electric rail as well as concepts to green the entire urban landscape. Another company, CargoWay, has an efficient and pollution-free grade separated cargo moving tram system that can move freely around the ports on compressed natural gas (CNG) and then speed out to the inland port on a raised guideway. Both of these systems can make use of the already existing Alameda Corridor and improve its ability to handle the flow of cargo from the ports.

The ultimate goal to streamline transportation and reduce pollution will be to remove sorting yards located in the inner city and make use of intermodal facilities located elsewhere, possibly in the Antelope Valley, Victorville or San Bernardino/Devore areas. There the cargo can be transferred to its final destination by other modes of transportation. Combining the use of better sorting and moving technology will not only go a long way to solve the ports problems but will also lessen the impacts that cargo transportation currently inflicts on the communities it travels through.

See Appendix B – One Project & Port Growth

Appendix B
One Project & Port Growth

References for Narrative

[1] Wikipedia, *Freeway and expressway revolts* http://en.wikipedia.org/wiki/Freeway_and_expressway_revolts (Retrieved January 8, 2011 4:10 PM)

[2] Annie Nam, Manager of Transportation Finance & Goods Movement SCAG, *Freight Planning and Investment Strategies in Southern California*, 2008, Chart pg 4

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[4] Nancy Pfeffer, Senior Regional Planner, author of SCAG Memo to: Plans and Programs Technical Advisory Committee, February 17, 2005, Re: Goods Movement White Paper for Secretary of Business, Transportation and Housing

[5] Financial Planning Charrette *710/210 Tunnel Connection: Moving Forward with a Critical Connection*, pg 4, source: Robert Huddy SCAG http://www.usc.edu/schools/sppd/keston/research/documents/710FinancingCharretteFinalReport_1-28-07_.pdf

[6] SCAG memo February 17, 2005 To: Plans & Programs Technical Advisory Commitiee, From: Nancy Pfeffer, Senior Regional Planner, RE: Goods Movement Wh~e Paper for Secretary of Business, Transportation & Housing

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[9] Principal Authors Ambreen Mahmood and Chan Pham, *Health Risk Assessment For the Four Commerce Railyards,* California Environmental Protection Agency Air Resources Board (CARB), Stationary Source Division, November 30, 2007, http://www.arb.ca.gov/railyard/hra/4com_hra.pdf

[10] John Guenther, *The Battle for "Greener" Railyards,* The Port Report: The State of L.A.'s Ports, http://johnguenther.com/stories/railyards.html (Retrieved January 16, 2011)

[11] Margot Roosevelt, *Wilmington-area schools to get air filters in bid to cut asthma*, Los Angeles Times, January 12, 2011

[12] Wikiquote, Albert Einstein http://en.wikiquote.org/wiki/Albert_Einstein (Retrieved January 16, 2011)

Support Documents for Declarative Statements (Printed)

La Canada Mayor Laura Olhasso to SCAG, I-710 Missing Link Truck Study, 2009
La Canada SR-710 Tunnel Performance Information, 2009
USC Keston Institute, Financial Planning Charrette, 710/210 Tunnel Connection, 2007
MegaRail Letter to Caltrans, 4-14-11
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CITY COUNCIL

Laura Olhasso, Mayor
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Gregory C. Brown
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David A. Spence

Mr. Mike Jones
Regional Planner
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017-3435

SUBJECT: **"I-710 Missing Link Truck Study" Comments**

Dear Mr. Jones:

Background:
The City of La Cañada Flintridge has reviewed the Draft Final Report for the I-710 Missing Link Truck Study prepared by Iteris dated May 2009. In addition, City staff has participated in several meetings hosted by the Arroyo-Verdugo Subregion regarding this Study. This Study was commissioned by the Southern California Association of Governments (SCAG) to further examine the potential vehicle and truck impacts on the surrounding freeway and roadway network if a tunnel was constructed between the existing northerly terminus of the SR-710 Freeway in Alhambra and the I-210/SR-134 freeway interchange in Pasadena. SCAG has emphasized that this study is technical and comparative in nature and is not meant as a recommendation either for or against a freeway tunnel.

City Comments:
The City's primary objections are the assumptions made in the preparation of the Study and unilateral recommendations of its conclusion. We question the usefulness and intent of the Study's findings, and are concerned about the myopic analysis made without consideration of the larger context of the alternatives and effects on regional traffic. **But, most importantly, the City also questions the usefulness of constructing the tunnel, since, based on the study's findings, if the tunnel is built, motorists would be driving farther and spending more time on the road**.

In response to SCAG's request for comments on the draft Final Report, the following detailed comments have been prepared after a review of the Study and listening to the technical consultant presentations.

1. The Study should explain its origin in more detail, and the reason why it was commissioned. The Study should clarify the purpose for this Study and under what guidelines it should or should not be used. The explanation should identify:
    a. the responsible agencies involved in the prior studies;
    b. the process used to define the scope of work;
    c. why this Study was deemed necessary;
    d. the exact scope as approved by SCAG; and

e. what the anticipated uses are for this document.

2. The Study should clarify that the Study was not prepared for the Arroyo Verdugo Subregion as stated in the title.

3. The Study should NOT assume that the "Route 710 Tunnel Technical Feasibility Assessment Report," conducted by Metro, conclusively demonstrated the environmental feasibility of the project, including the potential traffic impacts (Page 1). The Study even admits that the feasibility study did not extensively review the traffic effects on the roadway system.

4. The Study scope is very limited and uses outdated information and assumptions. Without updated and expanded analysis, this Study has NO validity. As such, it should not and can not form the basis for informed public participation and informed decision making. In Berkeley Keep Jets Over the Bay Committee v. Board of Port Com'rs (2001) 91 Cal.App.4th 1344, the Court concluded that an EIR that used "outdated information … was not a reasoned and good faith effort to inform decision makers and the public." Id. at 1367. At a minimum, the Study should be updated with SCAG 2009 Regional Transportation Plan (RTP) assumptions and modeling, and its scope should be expanded to answer the comments raised by the Arroyo-Verdugo participating cities and detailed below.

5. The Study confirms that in every comparison, the tunnel project would cause SIGNIFICANT detrimental traffic and truck impacts on the segment of the I-210 Freeway through the cities of La Cañada Flintridge, Glendale, Pasadena, and the community of La Crescenta.

6. A comparison of 2030 values with and without the tunnel project concludes:
   a. More than 25% increase in daily volume on I-210
   b. Additional 30,000 vehicles per day on I-210
   c. Additional 2,500 trucks per day on I-210
   d. 850 additional trucks per PM PEAK HOUR on I-210
   e. Truck percentages on I-210 increase from 11% to over 20%
   f. Higher truck volumes on Foothill Boulevard (almost no current truck volumes)
   g. Before-no freeway segments through City over capacity, after-most northbound segments over capacity
   h. I-210 freeway segments through city will operate over capacity (Level-of-Service F) and consequently force traffic onto local streets
   i. Foothill Boulevard will operate over capacity near Angeles Crest Highway

7. The Study repeatedly incorrectly identifies the tunnel segment as the "missing link" or "gap closure" when there is no mandate that it must be connected. The Study should explain the background and history of the 710 freeway connection, and that it is not universally assumed to be a "link" or "gap closure", as well as more detail on the origins of the tunnel alternative.

8. The Study should have given the results of the AM peak hour analysis in addition to the PM peak hour. Different traffic patterns are prevalent in the AM commuting hours and the associated potential AM impacts should have been identified and examined for the decision makers' review.

9. The Study should analyze the freeway interchange connections, transition lane capacities and arterial street intersections in determining Levels-of-Service and potential adverse impacts. It is universally recognized (see Highway Capacity Manual) that the "nodes" or intersections of roadways are the constraining features of a road network, not the segments in between.

10. The Study was made using outdated SCAG 2004 Regional Transportation Plan (RTP) regional traffic modeling for 2030 future traffic conditions with and without the freeway extension. After this study was initiated, the 2009 RTP with 2035 future traffic volumes and regional modeling was completed which included numerous updates to the RTP list of programmed projects. This Study should be expanded to compare traffic volumes on the roadway system using the updated 2035 forecasting.

11. If the Study does not use updated 2009 RTP forecasting model, then it is based on old, invalid data and must not be used in any subsequent study or analysis, particularly related to an EIR. At the very least, the Study shall include a disclaimer that it is based on outdated information and an updated analysis would be necessary for any future comparisons referencing this Study.

12. The Study should describe the assumptions made on the physical and operational characteristics of the tunnel, such as alignment, number of lanes, Level-of-Service, vertical grade, toll booths, access control, etc.

13. The Study only considered a connection between the SR-710 terminus and the I-210 Freeway. The Study should compare traffic and truck conditions for the different tunnel alignments as a way to determine if fewer adverse traffic impacts could be expected with a different scenario. This comparison would be consistent with the geological studies currently being conducted on a route-neutral basis with five possible alignments. For example, a tunnel alignment option that connects to the SR-2 freeway would mitigate the expected capacity deficiencies (and significant adverse impacts) along the I-210 freeway.

14. The Study was constrained to making findings about how truck and vehicle traffic would be redistributed with and without the tunnel. It should have compared alternate system-wide solutions to a tunnel scenario to help determine if there would be greater benefit or the cost would be better spent by making improvements to the existing roadway system with fewer environmental impacts than a tunnel.

15. The Study only analyzes a 4-lane tunnel scenario. The Study should compare the traffic conditions for a 3-lane tunnel as well, which was contemplated in the initial feasibility study.

16. The Study should also compare the future traffic conditions for a tunnel with NO trucks allowed, as discussed in the initial tunnel feasibility study.

17. The toll issue was not considered: full-access, free-flowing conditions were assumed. Any congestion from a toll booth would be handled by adding more toll booths and/or fastrak services. Toll booth congestion was not factored into drive time analyses. In addition, the

question of whether existing surface street congestion would be mitigated to any large extent because of traffic not using a tolled tunnel is not studied.

18. The study does not consider the vertical grade and its impacts on truck routing through or around the tunnel.

19. The Study identifies several freeway and arterial road segment impacts with expected adverse impacts and makes certain recommendations, but does not determine if these capacity enhancements would actually work or even mitigate the impact. The Study should be expanded to include a comparative analysis of the future roadway conditions if the recommendations/strategies were implemented.

20. The Study recommends adding a 5th travel lane to the segment of I-210 through the City (Section 5.1) as a way to address expected capacity deficiencies and increase in truck traffic. However, the Study does not identify the other related adverse impacts related to widening the freeway, nor does it consider other alternatives to widening. Therefore, the recommendations are premature and not thought out. The recommendations should be removed completely and replaced with a statement that these key issues would need to be addressed and/or mitigated.

21. If recommendations are to be included in the study, other capacity enhancing alternatives need to be considered, such as Demand Management, ITS, expanded rail freight transportation and exclusive truck corridors. If only freeway capacity enhancements are being considered, it should be clearly stated that there are numerous possible mitigation alternatives that have not been presented or analyzed, and the feasibility of any capacity enhancement has not been determined.

22. The recommendation to address expected impacts to Foothill Boulevard (Section 5.2) is incoherent and not understood. This recommendation needs to be clarified, and address all traffic, not just truck connections. It should be understood that SR-2 north of the I-210 Freeway is NOT a truck route and has truck restrictions. In addition, Foothill Boulevard is NOT a truck route, so non-local trucks are not allowed. Any reference to a truck route on Foothill Boulevard within the City should be removed.

23. While the Study graphically compares conditions with and without the tunnel, it is important that it <u>quantify</u> the magnitude of the operational improvement to the roadway system (or users) versus capacity degradations and overall delays to determine if the existing condition would be better to the road users than the proposed tunnel connection. A comparison parameter could be the miles of roadway that would decrease to LOS-F vs. the miles that would improve to LOS-E or better. Another comparison parameter would be vehicle hours of delay. This type of analysis would be limited to traffic benefits at this time, but should ultimately be evaluated on other environmental conditions as well.

It should be noted in the Study that a formal traffic impact study that is part of an EIR would have to address the same and more extensive traffic issues independently of this study and evaluate a full range of potential alternatives and mitigation measures.

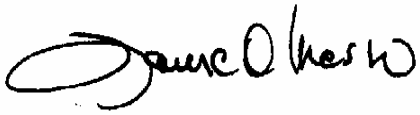
The tunnel connection creates some new LOS-F conditions, particularly at the gap-closure connection points and along the I-210 freeway north of SR-134. The project should not create new problems where there were none before.

The Study does not identify the magnitude of impacts on roadways adjacent to sensitive land uses i.e. residences, schools, etc. as opposed to those roadways adjacent to sensitive uses that would experience improvements. Any further study of the I-710 freeway connection should evaluate the overall benefit versus the adverse environmental impacts on the roadway network. This includes the impacts on multiple schools and thousands of school children within 1,000 feet of the 210 Freeway through the City.

Amazingly, the Study's summary findings conclude that the tunnel connection would make overall driving conditions worse. The number of vehicle miles traveled would INCREASE in the peak hour with an I-710 connection, which would bring a host of unintended environmental impacts. Even more astounding is that the number of vehicle hours would INCREASE as well, which translates to more hours of delay, gas consumption and air pollution. The system-wide benefit would be a small increase in overall average speed of 0.6 miles per hour. Regionally, the substandard traffic conditions that exist would not be improved if the tunnel was built and additionally, those substandard conditions would be introduced into areas that would otherwise, without the tunnel, have standard or better conditions. So, simply stated, if the tunnel is built, motorists would be driving farther and spending more time on the road. This is exactly the OPPOSITE of the intended regional objective of the tunnel connection. Isn't this enough reason to stop pursuing this project?

In conclusion, the City of La Cañada Flintridge urges that SCAG deem this study incomplete, and table any further discussion on this Study until: (1) an updated Study is prepared where current data, information and assumptions are presented; and/or (2) the CEQA challenges of the I-710 Tunnel to Measure R have been fully and finally adjudicated.

Sincerely,



Laura Olhasso
Mayor

c: City Council
Mark R. Alexander, City Manager
Honorable Assembly Member Anthony Portantino
Honorable Senator Carol Liu
Honorable Supervisor Michael Antonovich
Hasan Ikhrata, Executive Director, SCAG
Douglas Failing, Director, Caltrans District 7
Arthur Leahy, Chief Executive Officer, Metro
Honorable City Council Members and City Manager, City of Glendale
Honorable City Council Members and City Manager, City of Pasadena
Honorable City Council and City Manager, City of South Pasadena
Erik Zandvliet, City Traffic Engineer
Ann Wilson, Senior Management Analyst

Appendix A

City of La Cañada Flintridge
I-710 Missing Link Truck Study Review

TECHNICAL CORRECTIONS

1. Section 1 – The I-210 Freeway description is inaccurate and should be modified to include the connection east of the SR-57 freeway.
2. Section 2.3 – Please describe that no collision data was collected from certain cities, including the City of La Canada Flintridge
3. Section 2.5 and Figure 11 – Remove truck route from Foothill Boulevard in the City of La Canada Flintridge. Explain there are no truck routes in the City.
4. Change references to Gap Closure to "Tunnel" or "Connection".
5. Table 11- Provide legend for color-coding of issues and color code all Plan + Gap Closure scenarios stating "Same as Baseline Conditions).

CITY COUNCIL

Laura Olhasso, Mayor
Donald R. Voss, Mayor Pro Tem
Gregory C. Brown
Stephen A. Del Guercio
David A. Spence

SR-710 TUNNEL PERFORMANCE INFORMATION

SCAG, Metro and USC Studies - Analysis

IF THE TUNNEL IS COMPLETED, 75% OF LOCAL SURFACE STREETS WOULD STILL BE GRIDLOCKED.

1. Of the 80+ study segments that are currently operating over capacity (Level of Service (LOS) "F" – the lowest rating Caltrans can give and the point at which gridlock occurs, over 60 (75%) of these segments will remain over capacity after a tunnel is built.
    a. Many believe that streets such as Fair Oaks Blvd., Fremont Avenue, Los Robles Avenue and Atlantic Boulevard would begin to improve once a tunnel was built. However, these streets will still operate over capacity with severe congestion.
    b. At least 12 arterial streets…will experience higher traffic volumes solely due to the tunnel.

THE TUNNEL WOULD CAUSE SIGNIFICANT DETRIMENTAL TRAFFIC AND TRUCK IMPACTS ON THE I-210 FREEWAY THROUGH THE CITIES OF GLENDALE, PASADENA, LA CAÑADA FLINTRIDGE AND THE COMMUNITY OF LA CRESCENTA.

1. If the tunnel is completed by 2030, the following is projected to occur:
    a. More than a 25% increase in daily traffic volumes on I-210;
    b. An additional 30,000 vehicles per day on I-210;
    c. An additional 2,500 trucks per day on I-210;
    d. 850 additional trucks in the PM peak hour on I-210;
    e. Truck percentage on I-210 will increase from 11% to over 20%; and
    f. Since portions of the I-210 will operate at Level of Service (LOS) "F," traffic will be forced onto local streets..

THE TUNNEL CONNECTION WOULD MAKE OVERALL DRIVING CONDITIONS WORSE REGIONALLY.

1. The overall number of vehicle miles traveled would increase in the peak hour, bringing many environmental impacts;
2. The overall number of vehicle hours would increase (more delay, gas consumption and air pollution);
3. The system-wide, regional benefit would only be an increase in overall speed of .6 miles per hour; and
4. Motorists would be driving farther and spending more time on the road if the tunnel is built.

The previous information is an analysis by of the City of La Cañada Flintridge's Traffic Engineer of the SCAG (So. Ca. Assn. Of Gov'ts.)"SR-710 Missing Link Truck Study (Preliminary Draft Final Report)," conducted by Iteris, Inc., a consulting firm. This report studied traffic as it would be if the original tunnel route proposed by Caltrans/Metro was built (Route "3").

THE TUNNEL ITSELF WOULD BE GRIDLOCKED SOON AFTER COMPLETION.

1. "In the peak (northbound) direction, the gap closure is projected to operate at LOS F…"

The previous information is from the Metro "Route 710 Tunnel Technical Feasibility Assessment Report" (2006), p. 5-55 (this report also studied "Route 3").

DUE TO A LACK OF SUBSTANTIVE REDUCTION OF GRIDLOCK (SEE ABOVE), MOST OF THE RESIDENTS SOUTH OF THE TUNNEL WOULD CONTINUE TO BE IMPACTED BY RESPIRATORY PROBLEMS ASSOCIATED WITH POLLUTION, AND THE RESIDENTS ALONG THE I-210 FREEWAY WOULD HAVE INCREASED GRIDLOCK. THOSE RESIDENTS WOULD THEREFORE SEE AN INCREASE IN RESPIRATORY PROBLEMS, PARTICULARLY AFFECTING CHILDREN AND OTHER RESIDENTS ALONG THE FREEWAY.

1. "The increase in truck and automobile traffic on the I-210 freeway resulting from the proposed SR-710 extension would increase the exposure of surrounding communities to vehicular pollutants that may cause asthma and other respiratory disease." Dr. Rob McConnell, USC Keck School of Medicine, Division of Environmental Health
2. There is "emerging scientific consensus that residential or school proximity to major traffic corridors is associated with respiratory impairment in children and in adults." USC California Children's Health Study
3. Residential proximity to freeways is associated with increased rates of asthma. A group of pollutants is associated with slower growth in lung function, which is a strong predictor of "debilitating lung disease and mortality in later life." USC California Children's Health Study

1327 Foothill Boulevard • La Cañada Flintridge • California 91011-2137 • (818) 790-8880 • FAX: (818) 790-7536

USC Keston Institute for Public Finance and Infrastructure Policy

Financial Planning Charrette
710/210 Tunnel Connection

December 5, 2007
The University Club
University of Southern California

Meeting Summary

Louise Nelson Dyble, Ph.D.
The Keston Institute for Public Finance and Infrastructure Policy
University of Southern California

710/210 Tunnel Connection:
Moving Forward with a Critical Connection

BACKGROUND

The future economic and environmental health of the Los Angeles metropolitan area is inextricably linked to efficacy and adequacy of its transportation infrastructure. The efficient movement of goods and people throughout the region is critical to maintaining its vitality and to securing a prosperous and healthy future for its residents. No transportation facility, structure, or mode functions independently—they are all part of integrated systems of complementary, interdependent elements. The complexity of the transportation system of Los Angeles is compounded by the extent and size of the metropolitan region that it serves. In particular, the region hosts large, global port facilities that generate major goods movement challenges--and that directly impact traffic patterns throughout Southern California. Though Los Angeles leaders have spearheaded initiatives to develop multi-modal solutions to mobility issues such as the construction of the Alameda corridor and major recent expansions in regional rapid transit, the highway system remains the mode around which all of the other elements are organized. Historically and for the foreseeable future, ensuring the efficient function of highways and maximizing their capacity is crucial to ensuring mobility in Los Angeles and minimizing problems such as congestion and air pollution and the costs associated with them.

The importance of the 710/210 tunnel connector is recognized by federal, state and regional transportation traffic engineers and planners, and it is a priority project for the California Department of Transportation (Caltrans), the Southern California Association of Governments (SCAG) and the Los Angeles County Metropolitan Transportation Authority (MTA). The tunnel would serve to connect two major interstate freeways, closing a critical 4.5 mile gap in the regional highway system. Interstate 710 or the "Long Beach Freeway" is a major goods-movement corridor and an important north-south route extending from the City of Long Beach area in the South, through Los Angeles, and ending just north of Interstate 10 in Alhambra. The tunnel would continue the route as originally provided for in California Freeway and Expressway System plans dating back to the 1950s. It would descend in Alhambra, continue underground beneath the city of South Pasadena, and emerge in Pasadena to connect to

Interstate 210, where already there is a significant stretch of freeway that merges with that route near the terminus of State Route 134. Both in terms of optimizing the highway and transportation system of greater Los Angeles as a whole, and in terms of getting the maximum benefit from public expenditures and resources without compromising other needed projects, the 710 tunnel project presents a major opportunity.

PURPOSE

The Keston Institute for Public Finance and Infrastructure Policy was established at the University of Southern California in 2002 to leverage USC's intellectual resources to help California and the nation address critical infrastructure issues. The Keston Institute supports the formulation of infrastructure policies and practices that will improve the livability of California communities, ensure the economic well-being of its citizens, and promote environmental sustainability. The goal of the Institute is to raise the awareness of the value of infrastructure so that it can take its place with other vital issues on the public agenda such as jobs, education, and housing. To realize this goal, we can take steps to facilitate communication between state, regional and local leaders, financiers, and planners. We can provide a forum for collaboration and for the development of strategic programs that engage a broad range of stakeholders, including practitioners, policy-makers, and researchers, with the end goal of developing legislative and outreach programs that serve the public interest. The Keston Institute convened this one-day intensive meeting, "Financial Planning Charrette for the 710/210 Tunnel Connection" on December 5, 2007 to discuss the current status of a critical missing link of Southern California transportation infrastructure, to identify the remaining obstacles to its construction, to determine the possibilities for its financing, and to develop a plan of action towards realizing its completion.

The current proposed tunnel plan as it exists today represents major advances in technology and financing from previous plans. In the past, local opposition has halted the construction of proposed surface routes, despite the critical importance of this segment to the region in terms of air quality benefits, congestion relief, and safety. Local opposition to the construction of this segment of freeway delayed the project for approximately four decades, with protests and lawsuits by community groups and property owners in Alhambra, San Marino, Pasadena and La Canada/Flintridge, but the most vocal and aggressive opposition from activists and officials located in the City of South Pasadena.

Tunneling technology has dramatically reduced the costs of construction in recent years, and current proposals to route the tunnel hundreds of feet below the surface ameliorate local concerns about air quality effects, noise, and community disruption. Cutting-edge subterranean technology employing tunnel boring machines (TBM) can be used, rather than more intrusive cut-and-cover techniques that have been standard in the past. In addition, this critical segment of highway would dramatically reduce travel times and distances for one of the most important regional goods-movement corridors, and the value of its added efficiency means that it would generate reliable traffic and toll revenue. This presents a valuable opportunity for financing a critical piece of infrastructure without diverting scarce transportation funds from other vital Southern California projects.

The most recent report on the project provides the context for discussion of appropriate next steps. A major collaborative effort to move the project forward was spearheaded and funded by the MTA. A working group composed of technical staff from Caltrans, SCAG, and the Cities of Alhambra, La Canada Flintridge, Los Angeles, Pasadena, San Marino and South Pasadena advised and provided technical input for the study. The results were published in a report by engineering firm Parsons Brinkerhoff, *Route 710 Tunnel Technical Feasibility Report* which was submitted on June 7, 2006. Since then, the California Department of Transportation has been taking the lead in developing specific engineering plans and negotiating an appropriate arrangement for its completion.

SUMMARY OF DISCUSSIONS

The planning charrette opened with overviews from public officials of the history of the project and the status of engineering plans and cost estimates. It also featured the assessments and estimates of several leading legal firms, contractors, and financiers that have direct experience with similar projects around the world. The afternoon featured a lengthy informal discussion of the pragmatic steps still required to bring this project to fruition, including the role of private sector parties, the projected costs and variations on financial agreements, the relevant political circumstances in California, and the legislative and legal steps that are necessary to getting construction underway.

The meeting opened with introductions, and a statement from California State Assemblyman Mike Eng, representing district 49 including much of the San Gabriel Valley including Alhambra and San Marino. Assemblyman Eng offered his support for legislative action. Tracy Arnold, Director for Jobs and Economic

Growth of the Office of the Governor, expressed support for the project and stressed Governor Schwarzenegger's commitment to leveraging public money through private sector partnerships. Dan Farkas, representing California State Senator Gil Cedillo, confirmed their interest in seeing construction underway, and Senator Cedillo's willingness to sponsor needed legislation. Senator Cedillo represents Senate District 22, including much of Los Angeles as well as South Pasadena, Alhambra, and San Marino.

Robert Huddy of the Southern California Association of Governments began discussion with an overview of the history of the project. Mr. Huddy is a senior transportation manager who has been involved with the 710 connector project as a representative of SCAG for nearly two decades. Mr. Huddy emphasized the on-going local opposition to the project. He described how the environmental review process has been a critical obstacle to progress, as legal challenges create long delays and result in significant cost increases. He expressed optimism that the new proposals for tunneling combined with greater awareness of the regional importance of the project, including for environmental quality and for congestion relief, would continue to alleviate concerns. He noted that the South Pasadena city council, in particular, has moderated their stance on the facility.

The historical overview presented by Mr. Huddy was followed with data on current traffic estimates and cost estimates. Traffic estimates indicate that the tunnel would immediately attract significant traffic between the port area and Los Angeles heading toward major national distribution centers in San Bernardino County. It would alleviate traffic congestion for commuters and trucks on surrounding freeways, in particular Interstate 5, Interstate 10, and Highway 101 and also eliminate the current bottleneck whereI-710 currently ends in South Pasadena. The MTA was represented at the meeting by Linda Hui, Transportation Planning Manager of the San Gabriel Valley Area Team, and Caltrans District 7 was represented by senior engineer Abdi Saghafi, route 710 corridor manager, both of whom contributed informal assessments of current prospects and progress.

Michael Liikala, representing ACS-Dragados, followed with a detailed presentation on major engineering aspects of the tunnel project. He emphasized the savings in costs and time that have been made possible by recent advancements in tunneling technology utilizing TBMs. He mentioned several construction projects currently underway in Europe, including subway expansion projects as well as the A-86 tunnel in Paris, France and the M30 motorway in Madrid, Spain. He also discussed the Port of Miami Tunnel at

length, which has some significant similarities with the proposed 710 tunnel. In particular, the Miami tunnel, which extends under some densely populated areas, demonstrates how unobtrusive and efficient new tunneling technology can make such a project. He also emphasized the importance of quick action, stressing the rapid escalation of costs as delays in construction continue.

James Martling of Sperry Capital then discussed his firm's experience with public/private partnerships and emphasized the need for quick action to ensure financial feasibility. He also recommended that government agencies take responsibility for the environmental review process, which is considered too unpredictable for the private sector to take on that risk.

The final presentation of the day was made by Paul J. Ryan and Nick Moller of the Infrastructure Advisory Group of JP Morgan Securities. They presented a detailed spread sheet with financial data and assumptions for the tunnel project. They were able to adjust variables including the potential overall budget of the project (currently estimated at approximately $6 billion), traffic diversion, toll rates, the amount of government contributions, and the timeframe of concession agreements as well as other significant elements. Overall, it was clear at this stage that currently available data would support a financially feasible project in which the private sector could augment public appropriations with significant capital investments through a public/private partnership (PPP). Such an arrangement would shift considerable risk to the private sector, facilitate more rapid construction, and reduce operational costs in the long-term.

Mark Pisano, executive director of the Southern California Association of Governments, led a general discussion following the presentation. Mr. Pisano emphasized the importance of pragmatic action and the development of a workable legislative strategy. He also emphasized the need to give local community groups and city officials a voice in the decision-making process.

Discussants agreed that the project appeared feasible as a PPP, and that because of its importance to improved air quality and mobility and the economy of the entire region, it should be prioritized and considered as a discrete project apart from more general efforts to authorize public/private partnerships and local toll facilities.

CONCLUSIONS

1. Though further geological studies are needed, improvements in tunneling technologies have made the 710/210 connector feasible and cost-efficient
2. Historically, local opposition to the connector has been a major obstacle to its completion, but the proposal to construct the facility deep underground addresses most of the identified concerns. Integrating local governments and community groups into the decision-making will facilitate progress.
3. Current traffic patterns suggest that there would be ample demand for a fairly significant toll ($5-10).
4. The environmental review process is a major and expensive element of the project, and will have to be undertaken by a public entity with significant financial and legal resources.
5. Investors should be willing to take on significant risk in exchange for a long-term toll concession, with only limited financial participation by the public sector, but will not take responsibility for environmental permitting or related legal costs
6. Politically, state leaders can be expected to approve the project if it is framed appropriately and its benefits are publicized with their constituents. Public education about the environmental and economic benefits of the project should be part of the effort to get it underway.

NEXT STEPS

While this project is a good candidate for a public private partnership, the specific administrative and political form that it will take is not yet clear. Legislation is needed both to authorize a revenue-supported project and permit private participation in its financing and operation. This is the first step in allowing the project to move forward. Although there is solid financial and engineering data available, the environmental aspects of the project remain to be examined. Funds must be appropriated to support the combined CEQA/NEPA process. In addition, the specific institutional mechanism for administering the project must be decided. For example, will the project be administered by Caltrans, a project-specific JPA, or through some other mechanism?

Overall, the 710/210 tunnel connection should offer environmental and mobility improvements and is an excellent candidate for California to leverage private capital. The estimated construction and operating costs can be supported by a toll structure that is in line with other revenue-supported facilities around the U.S. There is little likelihood that this much-needed project will be constructed solely with public funds.

APPENDIX A

Agenda

Financial Planning Charrette

710/210 Tunnel Connection

Welcome

Self-Introduction of Attendees

Overview and History of the Project

Current Status of Estimates (age and source)

- Traffic (by type and time)
- Cost (construction, O&M, etc.)

Project Revenue Sources

- ROW, federal, state, and local funds
- Toll structure to provide capital shortfall and on-going O&M and reserves

Alternative Financing Structures and Sensitivity Analysis

Existing Legislative Barriers and Needed Enabling Legislation

Preliminary Feasibility Determination

Next Steps

APPENDIX B

Attendees

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APPENDIX C

Fact Sheet, provided by Abdi Saghafi P.E., P.M.P, Corridor Manager - ROUTE 710 California Department of Transportation.

Fact Sheet For EA 18790

CONSTRUCT FREEWAY

LA -710-26.7/32.1T

Project Description:

- **Location and Limits:**

  IN ALHAMBRA TO PASADENA 0.2 MILE NORTH OF JUNCTION 10 TO DEL MAR BOULEVARD OVERCROSSING KP=43/51.7

- **Background:**

  Route 710 is a major north-south Interstate route used for inter-regional and intraregional commuting and shipping through an urbanized corridor, connecting the Ports of Long Beach and Los Angeles to the western San Gabriel Valley.

  - In 1964 the California Highway Commission adopted the "Meridian Route" for the 710 Extension through the Cities of Alhambra, Los Angeles, South Pasadena and Pasadena to close the 6.2-mile gap between Routes 10 and 210, in order to maintain the best possible levels of service.
  - In 1986 a third Draft Environmental Impact Statement (DEIS)-Supplement was prepared, to present the Meridian Variation Alternative, which was developed to reduce the project's impacts on historic properties.
  - On April 13, 1998, FHWA approved the Record Of Decision (ROD) with additional conditions. The construction cost for ROD selected alternative is $823 Million.
  - City of South Pasadena and its allies have filed several lawsuits against Caltrans, CTC and FHWA ever since the project started in 1973. The latest suit was filed on June 10, 1998 challenging the EIS.
  - Caltrans has programmed $9.7 million through the Interregional Transportation Improvement Program (ITIP) for Interim Traffic Improvement projects throughout the 710 corridor as mandated by FHWA in the Record of Decision (ROD).
  - Total estimate for Interim Traffic Improvement projects proposed by the Design Advisory Group (DAG) was $25.1 million. The cities of South Pasadena, Pasadena and the community of El Sereno have been able to secure an additional $46 million through Congressman Rogan, to fund additional improvement projects throughout the I-710 Corridor. The cities noted above are working with Caltrans' Office of Local Assistance to implement their respective projects.
  - FHWA rescinded the ROD in December 2003.
  - Metropolitan Transportation Authority (Metro) commissioned a Feasibility Assessment Study of the Tunnel Option in 2006. The Study concluded that the Tunnel Option is feasible.
  - Currently, Caltrans is emabarking on a series of "Route Neutral" Technical Studies , in order to determine the best alternative. These studies will last about two years and will further evaluate the Tunnel Option , as well as the other alternatives.

- **What The Work Involves:**

  Once the Route Neutral Technical Studies are completed, Caltrans will begin the Environmental studies and the Project Report on the preferred alternative.

- **Benefits:**

  - This project will provide a critical connecting link to the regional transportation highway system, allowing the system to operate more efficiently and effectively.
  - It will divert through traffic from local arterials, thereby relieving traffic congestion and better serving the existing and future local transportation needs of the area.
  - It will provide a critical link in a program wide High Occupancy Vehicle (HOV) lane system by connecting the HOV lanes on 4 major freeways.

- It will provide a crucial element in the regions' air quality management plan by reducing traffic congestion and promoting free flowing traffic.

Schedules:

Construction Phase Began: N/A
Construction Phase Ended: N/A

Total Programmed Project Costs: $ 3,060.000 Million

Project Contacts:

Project Manager: Abdi Saghafi, 7-9810
Assistant Project Manager: Kin W. Kwan, 7-2793
Area Manager: I710

MEGARAIL® TRANSPORTATION SYSTEMS, Inc. **21st CenturyTransport**

14 April 2011

Ron Kosinski, Deputy District Director
Caltrans District 7
100 S. Main St.
Los Angeles, CA 90012.

Subject: Demand Letter for Inclusion in EIR for I-710 Extension Project

This letter is to demand inclusion of our combination CargoWay™ and CargoTram™ systems for consideration for the I-710 EIR.extension project.

This demand is made in view of previous incomplete and accurate reviews of this system by the LA METRO and ports that resulted in excluding this system upon the incorrect basis that it was a "fixed guideway" system and thus would not be acceptable because "fixed guideways" would be unacceptable inside ports and rail facilities. The reviewers obviously missed the fact that the CargoTrams are dual-mode, meaning that they can operate in exactly the same manner as tandem trucks within the ports and within the rail yards, but operate for most of their trips on the elevated, electrified CargoWays. CargoTram entry and exit ramps are provided at the port and rail yard boundaries. (The elevated CargoWay guideways **DO NOT** run over ports and railroad yards. CargoTrams operate from grid electric power supplied by the CargoWays during CargoWay transit. The lead car of each CargoTram supplies electric power to the entire tram from a combination of battery power and power generated by use of clean-burning CNG-driven generators.

The low cost CargoWays can easily be elevated over the Alameda Corridor railways as described in the enclosed document or over the space at the sides of any freeway, including I-710 or other freeways running into the central LA area. CargoWays can also be installed above existent railways.

The important bottom lines are that use of this system can (1) eliminate most of the air pollution now caused from cargo movement, (2) avoid the high cost and disruption of freeway expansion, provide non-stop transfer of cargo between ports, the LA rail yards, or the Inland Empire, or other destinations and accomplish this at far lower cost than any other approach.

We would appreciate your careful consideration of the systems described in the enclosed CagroTram Alameda Corridor Zero Emission Cargo Transport document. We would be pleased to provide additional information that you might find helpful.

J. K. Henderson, President

401 West Jim Wright Freeway, Suite 113, 76108 - Mail to PO Box 121728, Fort Worth, Texas 76121
(817) 738-9507 contact@megarail.com www.megarail.com FAX (817) 367-2373

Coalition For A Safe Environment

P.O. Box 1918, Wilmington, California 90748
wilmingtoncoalition @ prodigy.net 310-834-1128

February 25, 2009

Sam A. Joumblat
Executive Director
Intermodal Container Transfer Facility
Joint Power Authority
P. O. Box 570
Long Beach, CA 90801-0570
info @ ictf-jpa.org

Re: ICTF Joint Powers Authority
CEQA Notice of Preparation & Initial Study
Intermodal Container Transfer Facility
Modernization Project

Su: Submission of Public Comments

Mr. Joumblat:

The Coalition For A Safe Environment is an Environmental Justice Community based non-profit organization with members in Wilmington, Long Beach, Carson and over 20 other cities in California.

Coalition For A Safe Environment (CFASE) Mission Statement is - To protect, promote, preserve and restore our Mother Earth's delicate ecology, environment, natural resources and wildlife. To attain Environmental Justice in international trade marine ports, goods movement transportation corridors, petroleum and energy industry communities.

On behalf of our members we submit the following public comments:

1. **Proposed Project Goals**

A. Reduce emissions at the ICTF by replacing diesel-powered equipment with electric-powered equipment.

Request the JPA, Ports and Union Pacific:

a. Not limit reduction of emissions to only replacing diesel-powered equipment with electric-powered equipment.

b. Replace all Harbor Line, Union Pacific and BNSF railroad diesel fuel and alternative petroleum fuel switching and line-long haul locomotive engine trains from the Ports to the ICTF with an all Electric Train or MagLev Train Technology System which eliminates all diesel fuel emissions.

c. Up-grade the Alameda Corridor to be an Electric Train or MagLev Train Technology which eliminates all diesel fuel emissions.

B. Provide additional near-dock rail capacity and container throughput by increasing operation efficiencies consistent with the Ports' Rail Master Plan Study and minimize surface transportation congestion and/or delays.

Request the JPA, Ports and Union Pacific:

a. Conduct an assessment of a 21st century MagLev Train Technology System that can be used by Ports to the ICTF facility and the Alameda Corridor which would eliminate the need for expanding the ICTF facility since a MagLev Train Technology System would be more cost effective, efficient, increases velocity and capacity by 3X to 5X.

   We recommend the American Maglev Technology, Inc. - MagLev EMMI Cargo System. American Maglev Technology, Inc. has offered to build the demonstration project at no cost to the JPA, Ports and Union Pacific.

   The EMMI Cargo System uses a proven magnetic levitation technology to transport containers and bulk cargo. Maglev technology passenger transportation systems are currently in use throughout the world. The EMMI MagLev System produces no air pollution, minimum noise, minimizes ground vibration, operates on a track and only requires a maximum of a twenty foot wide easement. The system can transport 4,000+ container loads per day. The MagLev train travels from "O" mph to 60mph at a cost of about $10 per hour per 80kw.

b. Conduct an assessment of an Electric Train or MagLev Train Technology System for use by Ports to the Alameda Corridor that can be used which would eliminate the need for expanding the ICTF facility since an Electric Train Technology System would be more cost effective, efficient, increases velocity and capacity by 2X to 3X.

c. Prepare a new Rail Master Plan that would allow new terminals and the expansion of existing terminals to be integrated into a new modern 21st century Maglev Train Technology System or Electric Train Technology System vs the current 20th century Diesel fuel Locomotive Engine Transportation Technology.

d. The existing Rail Master Plan Study is out dated 20th century technology and does not meet 21st and 22nd century environmentally green, public health safety and efficiency needs.

C. Provide enhanced cargo security through new technologies, including biometrics.

Request the JPA, Ports and Union Pacific:

a. Require all enhanced cargo security equipment and biometrics be contained and performed on port property thereby eliminating increased equipment costs, personnel costs, inspection time and waste of public funds on off-port property duplicative cargo security equipment and inspection costs.

b. Require all containers be inspected on port property prior to being transported off-port property thereby eliminating potential public impacts.

c. Require all non-container cargo be inspected on port property prior to being transported off-port property thereby eliminating potential public impacts.

d. Require all drayage trucks be inspected on port property prior to being transported off-port property thereby eliminating potential public impacts.

D. Continue to promote the direct transfer of cargo from port to rail with minimal surface transportation congestion and/or delays.

Request the JPA, Ports and Union Pacific:

a. Ports build on-dock shipside rail lines to allow direct drop down from cranes unloading containers to awaiting rail cars to eliminate duplicative and increased trans-loading costs and the need for off-port property intermodal facilities such as the ICTF. On-dock shipside rail increases efficiency, velocity, capacity and decreased shipment time.

b. Ports build on-dock shipside rail lines to allow direct drop down from cranes unloading cargo and bulk cargo to awaiting rail cars to eliminate duplicative and increased trans-loading costs and the need for of-port property intermodal facilities such as ICTF. On-dock shipside rail increases efficiency, velocity, capacity and decreased shipment time.

c. Ports prepare a new Rail Master Plan that would allow new terminals and the expansion of existing terminals to be integrated into a new modern 21st century Maglev Train Technology System or Electric Train Technology System vs the current 20th century Diesel Fuel Locomotive Engine Transportation Technology System.

d. Ports and tenants utilize real-time IT logistics software to identify containers and cargo for strategic placement on ships and for first-in, first-out efficient unloading for direct non-stop destination transportation.

E. Project goals will be further defined in the Draft EIR.

Request the JPA, Ports and Union Pacific:

a. Require the ICTF NOP/IS identify all project goals for addressing the ICTF construction and operation so that the public is able to provide advance scrutiny, assessment, alternatives recommendations and public comment. This saves substantial project personnel time costs, government agency personnel time costs, public time and unnecessary waste of public funds held in trust.

b. Require the ICTF NOP/IS identify all project goals for addressing the ICTF environmental impacts and mitigation during construction and operation so that the

public is able to provide advance scrutiny, assessment, alternatives recommendations and public comment. This saves substantial project personnel time costs, government agency personnel time costs, public time and unnecessary waste of public funds held in trust.

c. Require the ICTF NOP/IS identify all project goals for addressing the ICTF public health impacts and environmental mitigation during construction and operation so that the public is able to provide advance scrutiny, assessment, alternatives recommendations and public comment. This saves substantial project personnel time costs, government agency personnel time costs, public time and unnecessary waste of public funds held in trust.

2. Increased Alameda Corridor Usage Alternative

Request the JPA, Ports and Union Pacific:

Require a mandatory increased usage of the Alameda Corridor by all Port tenants. The Alameda Corridor's current available capacity is 65%-70% for new container and cargo shipments. The increased usage of the Alameda Corridor would decrease the need to expand the ICTF facility.

3. Intermodal Rail Facility Location Alternatives

Request the JPA, Ports and Union Pacific:

a. Require that the Port of Long Beach Toyota Logistics import car terminal be assessed as a potential near-dock intermodal rail facility. There is no reason that two or more multi-story car parking lot structures cannot be built that can free up to 80% of the parking lot area. The Toyota lease can be re-negotiated with new incentive offered and/or the lease re-negotiated when it expires. New import cars sales decreased last year 2008, will continue to decrease this year 2009 and are projected to decrease next year 2010. There is a higher priority need for a new intermodal facility.

b. Require that the new Port of Long Beach Middle Harbor Redevelopment Project Terminal be assessed as a potential on-dock intermodal rail facility. Port of Long Beach container business decreased in 2008, will decrease in 2009 and projected to decrease in 2010. An on-dock intermodal facility is a higher priority need vs a near dock facility.

4. Drayage Trucks Alternatives.

Request the JPA, Ports and Union Pacific:

a. Require that all diesel fuel and alternative petroleum fuel drayage trucks servicing the ICTF facility be replaced with short haul Balqon Corproation. or equivalent Electric Drayage Trucks.

The Balqon Electric Truck is designed to be a short haul distance drayage truck. It is zero air polluting, has a maximum speed of 40mph, has a maximum range of 60 miles when empty unloaded and a maximum range of 30 miles fully loaded. It It can transport a standard 65,000 lb. loaded container. It can be 60% charged in 1 hr and 100% charged in 3-4 hrs.

b. Require that all diesel fuel drayage trucks that are 2005 and older servicing the ICTF facility that have a crankcase blow-by pipe be retrofitted with the Miracle Mile Solution, Inc. Vehicle Additive Technology Solution System and HAD Crankcase Recirculation System Technology.

   The Vehicle Additive Technology Solution System (VATSS) is an innovative hybrid sequential fuel management system, which lowers fuel consumption and increases combustion efficiency. Exhaust stack pollution is significantly reduced as a result of improved combustion efficiency and lower fuel consumption.

   The major benefits of VATSS are: Increased Miles per Gallon (MPG), Lower Fuel Expenses, Tail-Pipe Emissions that meet or exceed the 2007 EPA Emissions Standards and Reduced Greenhouse Gas pollutants from engines after its installation. This will not negatively affect the Factory OEM Horse Power Ratings.

   The HAD Crankcase Recirculation System has a C.A.R.B. EO # D-650. This system eliminates all crankcase emissions known as blow-by and returns combustion VOC vapors from the crankcase into the air intake induction system as a reusable fuel source. In addition this technology system recycles residual oil and returns it to the crankcase.

   This system also eliminates all the by-product VOC vapor gases and toxic PM fumes from the crankcase traditionally expelled from the blow-by tube, thus removing all the crankcase air pollutants from the atmosphere and the traditional oil leakage unto the ground, which occurs during idle and normal engine operating conditions that are toxic and contains carcinogens. This system does not have filters to change and also decreases oil consumption.

5. Intermodal Rail Yard Emissions Control Alternatives

Request the JPA, Ports and Union Pacific:

a. Require the ICTF facility to use the Advanced Cleanup Technologies, Inc. - Advanced Locomotive Emissions Control Systems (ALECS) to capture locomotive engine emissions. The system reduces Sulfur Dioxide (SOX) by 97%, Particulate Matter (PM) by 92% and Oxides of Nitrogen (NOX) by 97%.

   Advanced Cleanup Technologies, Inc. - Advanced Locomotive Emissions Control System (ALECS). A train locomotive idling engines exhaust is captured by an emissions capture system which consists of a bonnet that is placed over a smoke

stack to suck in the exhaust which is then transferred through a hose-like duct to an emissions treatment subsystem. The ALECS System can be configured to have multiple bonnets to connect a series of locomotive engines and can be mounted on an overhead rail system which can traverse back and forth over one or more idling locomotive engines. ALECS would typically be built on one side of the rail tracks.

b. Require all fuel storage tanks to be built or retrofitted with a 100% closed-loop vapor recovery system that does not vent out VOC's into the ambient atmosphere.

6. Electric Utility Power Alternatives

Request the JPA, Ports and Union Pacific:

a. Require that a 30 MW Solar Power System be built at the ICTF facility. The proposed project will have significant impact upon public LADWP electrical power utility to provide electrical power. The JPA, Ports and Union Pacific do not significantly financially contribute to the building of new electrical power facilities, their maintenance, repair or replacement. There is sufficient overhead space above buildings, rail yard area, railroad tracks, facility grounds and containers that is available.

   We recommend the Pyron Solar, Inc. - Solar Energy Power Plant

   Pyron Solar has developed a concentrating solar technology that is a revolutionary low-profile floating system with short-focal-length lenses which concentrate direct sunlight by 400% onto photovoltaic cells. These advanced multi-junction cell and arrays generate 800 times more electricity than conventional non-concentrating cells the same size. The National Renewable Energy Laboratory of the U.S. Department of Energy has confirmed a 37.3% efficiency of the cells. The system does require cooling potable water from any source. Using the same land surface area a Pyron Solar Power Plant generates 14.5 times more electricity that the world's largest solar power plant, SOLAR II, 8.6 times more electricity than the LUZ-solar power plant in Kramer Junction, CA and 190 times more electricity that the solar chimney plant in Manzanares, Spain.

b. Require that a 60 MW Wind Energy Power System be built at the ICTF facility and along the railroad tracks. The proposed project will have significant impact upon public LADWP electrical power utility to provide electrical power. The JPA, Ports and Union Pacific do not significantly financially contribute to the building of new electrical power facilities, their maintenance, repair or replacement. There is sufficient overhead space above buildings, rail yard area, railroad tracks, facility grounds and containers that is available.

   We recommend the Mariah Power Windspire and Quiet Revolution, LTD. Vertical Wind Turbine designs.

7. Health Impact Assessment (HIA) & Public Health Survey Study Alternatives

Request the JPA, Ports and Union Pacific:

a. Conduct a Health Impact Assessment Study as part of the Environmental Impact Report and Health Risk Assessment (HRA). An HIA provides a more comprehensive assessment of the public health and economic impacts of a project. The Los Angeles County Health Department and the US EPA Region 9 both support the use of a HIA for Ports and goods movement construction and operation projects.

b. Conduct a Public Health Survey (PHS's) in the identified public impacted sensitive receptor areas, which can be used to establish a Public Health Baseline (PHB). Health Risk Assessments are significantly inaccurate because they are based on a computer model and not an actual Public Health Baseline.

c. Require the establishment of a Public Health Care Mitigation Fund that can mitigate public health impacts, support necessary HIA, PHB, PHS's research studies and provide financial assistance for immediate, short term and long term care such as:

   Public health care & treatment, assistance to pay for health care at local clinics & county hospitals, assistance to pay for health insurance, assistance to pay for medical equipment, assistance to pay for medical supplies, assistance to pay for medical prescriptions, assistance for funeral expenses, assistance for short & long term convalescent care, assistance for rehabilitation, assistance for job retraining, assistance for lost income and assistance for special learning disability assistance.

8. Noise Mitigation Alternatives

Request the JPA, Ports and Union Pacific:

a. Require the installation of Sound Proof Glass in all residential homes, public schools, senior care facilities etc. and sensitive receptors within 3 miles of the ICTF facility. Request that the Sound Proof Glass have a minimum STC Rating (Sound Transmission Class) of 56.

b. Require the installation of Sound Proof Doors in all residential homes, public schools, senior care facilities etc. and sensitive receptors within 3 miles of the ICTF facility. Request that the Sound Proof Glass have a minimum STC Rating (Sound Transmission Class) of 60.

c. Require the installation of Sound Proof Curtains in all residential home, public schools, senior care facilities etc. and sensitive receptors within 3 miles of the ICTF facility. Sound Proof Curtains can also be temporarily installed during any construction. Request that the Sound Proof Curtains have a minimum STC Rating (Sound Transmission Class) of 50.

d. Require that no track be within 1500' of residential homes, public schools, senior care facilities etc. and sensitive receptors.

e. Require that ICTF establish a plan to minimize usage of rail tracks near residential homes, public schools, senior care facilities etc. and sensitive receptors when not necessary.

9. Light Mitigation Alternatives

Request the JPA, Ports and Union Pacific:

a. Require the installation of electrical energy saving LED lighting fixtures in lieu of its planned lighting fixtures.

b. Require that the maximum height of a lighting fixture be 40’ in height.

c. Require that ICTF establish a plan to minimize light usage when parts of the facility are not being used.

d. Require the installation of electrical energy saving LED lighting fixtures in lieu of its planned lighting fixtures.

10. Air Quality Mitigation Alternatives

Request the JPA, Ports and Union Pacific:

a. Require that the ICTF stop locomotive engine and drayage truck operations on SCAQMD smog alert days.

b. Require that the ICTF stop locomotive engine and drayage truck operations when a federal National Ambient Air Quality Standard (NAAQS) is exceeded.

11. Cumulative Impact Assessment

Request the JPA, Ports and Union Pacific:

a. Require that the cumulative impact assessment study include all impacted Environmental Justice Communities regionally beginning with Port Communities, Transportation Corridor Communities, Rail Yard Communities and Distribution Center Communities to their final destinations in California and leaving California.

b. Require that the locomotive train traffic and environmental impact assessment study include all impacted Environmental Justice Communities regionally beginning with Port Communities, Transportation Corridor Communities, Rail Yard Communities and Distribution Center Communities to their final destinations in California and leaving California.

c. Require that the drayage truck traffic and environmental impact assessment study include all impacted Environmental Justice Communities regionally beginning with

Port Communities, Transportation Corridor Communities, Rail Yard Communities and Distribution Center Communities to their final destinations in California and leaving California.

d. Require that the Drayage Truck Traffic Study include an assessment of public transportation infrastructure maintenance, repair, replacement and new construction costs that are primarily supporting the private business industry and not the public. This includes local EJ Community arterial support surface streets and sidewalks that are damaged by truck traffic.

e. Require that the air quality environmental impact assessment study include all impacted Environmental Justice Communities regionally beginning with Port Communities, Transportation Corridor Communities, Rail Yard Communities and Distribution Center Communities to their final destinations in California and leaving California.

12. Hazardous Material Transportation Assessment Study

Request the JPA, Ports and Union Pacific:

Require a Hazardous Material Transportation Assessment Study to assess public risk and emergency response due to an accidental or terrorist attack or train derailment causing a public road blockage, toxic spill, fire, explosion, release of radiation or other dangerous substance.

Respectfully Submitted,

Jesse N. Marquez
Executive Director
jnmarquez @ prodigy.net
310-704-1265

NATURAL RESOURCES DEFENSE COUNCIL

AMERICAN LUNG ASSOCIATION IN CALIFORNIA

COALITION FOR A SAFE ENVIRONMENT

COALITION FOR CLEAN AIR

COMMUNITIES FOR CLEAN PORTS

EAST YARD COMMUNITIES FOR ENVIRONMENTAL JUSTICE

HARBOR WATTS EDC

LONG BEACH ALLIANCE FOR CHILDREN WITH ASTHMA

SAN PEDRO AND PENINSULA HOMEOWNER'S COALITION

February 25, 2009

Via First Class Mail and Email

Sam A. Joumblat
Executive Director
Intermodal Container Transfer Facility Joint Powers Authority
P.O. Box 570
Long Beach, CA 90801-0570
info@ictf-jpa.org

Re: Notice of Preparation / Initial Study – ICTF Project

Dear Mr. Joumblat:

On behalf of The Natural Resources Defense Council ("NRDC") and the undersigned, we hereby submit the following comments on the Notice of Preparation and Initial Study for the Intermodal Container Transfer Facility ("ICTF") Project (the "Project").

1. The EIR must not narrowly define project objectives.

We are concerned that the currently stated objectives of the Project may artificially limit the range of alternatives considered in the EIR. If the project objective is defined too narrowly, the subsequent analysis of alternatives in the EIR may be inadequate, for it is the project objective that guides the identification and consideration of alternatives. *See* CEQA Guidelines § 15124(b).

Here, one of the stated Project goals is to "continue to promote the direct transfer of cargo from port to rail with minimal surface transportation congestion and/or delays." NOP at 3. However, the NOP appears to define "direct transfer" to exclude on-dock rail. For example, another Project goal is: "provide additional near-dock rail capacity and container throughput by increasing operation efficiencies consistent with the Ports' Rail Master Plan Study and minimize surface transportation congestion and/or delays . . . ." NOP at 2.

A limitation on "direct transfer" to near-dock rail is not consistent with CEQA. As you know, CEQA requires that the EIR present reasonable alternatives "which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree attainment of the project objectives, or would be more costly." CEQA Guidelines § 15126.6(b). We therefore expect that the EIR will incorporate a more accurate set of Project objectives that does not limit the range of alternatives to near-dock facilities, and which includes a reasonable range of alternatives, including but not limited to advanced container movement technologies.

2. The EIR must address a reasonable range of alternatives.

There are a number of alternatives which the EIR needs to evaluate. These include:

- Advanced technology container movement. The Port of Los Angeles is undertaking an RFP process for bids for advanced technology for containers, such as maglev. The EIR should take this into account.

- Electric drayage trucks. The Ports and the South Coast Air Quality Management District (the "District") are working to develop electric drayage trucks. A prototype was rolled out last year at the Port of Los Angeles.

- On-dock rail. With sufficient new on-dock rail, expansion of ICTF may not be necessary.

- Use of the Port of Los Angeles Terminal Island Intermodal Facility and/or the Port of Long Beach Pier T Mole Expansion (also on Terminal Island) could adequately satisfy the ports' rail infrastructure needs.

- Zero-emission fixed-guideway alternatives. See the February 17, 2009 letter from the District to the I-710 Technical Advisory Committee, a copy of which is enclosed with this letter for your reference.

- Alameda Corridor electrification. As you know, the Corridor was constructed with electrification in mind. Emissions from diesel locomotives leaving the ICTF facility could be reduced if the Corridor is electrified.

- SR 47 alternatives. The SR 47 truck freeway project is now in the EIR process. When considering the cumulative effects of the Project, the SR 47 projects and its alternatives should be considered. There are serious heal risk issues posed by the routing and development of SR 47.

- The EIR should not be constrained by outmoded Ports Rail Master Plan Study.

3. The EIR must address all components of the Project, plus the cumulative impacts of the Project.

The EIR must provide a clear and accurate project description that addresses all of the project's components. *See County of Inyo v. City of Los Angeles*, 124 Cal.App.3d 1, 9 (1981) ("An accurate, stable, and finite project description is the *sine qua non* of an informative and legally sufficient EIR."). Both the method of transportation of containers and the routes to be taken to move containers to the Project will have an effect on the physical environment and on the health of residents near the Project and associated roadways.

In addition, there will be environmental effects from the additional rail traffic contemplated in the NOP, and from the proposed new BNSF facility, if built (see NOP at 4). These impacts may be felt, for example, in communities near the Commerce railyards and in the Inland Empire that will see more train traffic due to the Project. These impacts must be analyzed in the EIR.

4. The EIR must present an accurate environmental baseline.

Under CEQA, the baseline conditions for determining "significant impacts" are those local and regional conditions that exist when the NOP is made available for review. *See* CEQA Guidelines, §15125(a) (an EIR must describe the "physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published . . . from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."). Here, neither the local nor regional conditions in the vicinity of the Project area appear to have been adequately described in the NOP; see NOP at 3-4. .

For instance, the EIR must include a detailed analysis of the current levels of noise, air pollution, light pollution, vibration, as well as traffic conditions, and make a realistic comparison of the environmental impacts of the proposed Project versus the existing conditions. In addition, the EIR must contain documentation to support baseline numbers and sufficient analysis to explain and justify the estimated truck trips, yard activities, locomotive trips, and other activities that will be generated by the proposed Project. We have found, for example in the SR 47 project, that sloppy work in modeling can greatly complicate and delay a project.

In addition, the local and regional environmental conditions in the vicinity of the proposed Project site must be described and analyzed. Local schools, a shelter for veterans, churches, parks, and residential neighborhoods must be recognized and impacts on them analyzed and discussed.

5. The scope of analysis in the EIR must address local as well as regional effects.

Just as the environmental baseline must address the local as well as the regional context, CEQA requires that the EIR analyze the local and regional environmental impacts of a proposed project. "The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the *full* environmental context." CEQA Guidelines § 15125(c) (emphasis added). The Project may lead to an additional 1.5 million truck trips per year though the West

Long Beach and surrounding neighborhoods. There may also be effects on nearby freeways such as the I-405 and I-710. In addition, a substantial increase in rail traffic is proposed; this increase will have effects on the physical environment in the Inland Empire as well as locally.

Moreover, we are concerned that given the fact that the ports expect at least a tripling of cargo throughput over the next two to three decades, it is unrealistic to suggest that the proposed Project would replace truck traffic on the I-710 with rail transport. Rather, the more realistic view—and the one that should be reflected in the EIR—is that this increase in throughput (if it occurs) will lead to additional traffic on the I-710 and I-405, as part of a significant increase in goods movement and thus air pollution and health impacts in the Southern California region.

6. The EIR should address all feasible measures to mitigate the project's environmental impacts.

Under CEQA, all feasible mitigation measures must be considered and implemented to reduce environmental impacts to a level of insignificance. *See* CEQA Guidelines § 15126.4. To that end, the EIR for this project should adopt all applicable mitigation measures identified in the Ports' Clean Air Action Plan and the Ports' Clean Trucks Plans. Additionally, the EIR should address electrification of the Alameda Corridor and Alameda Corridor East, since maximizing use of the Alameda Corridor is both a goal and foreseeable result of this project.

One important issue to be considered and analyzed is the enforceability of proposed mitigation measures. The existing ICTF facility has not been well-maintained, and so attention should be given to whether and why the operators of ICTF can be trusted to carry out any proposed mitigation measures in the future.

7. The EIR must address all reasonably foreseeable future impacts.

The EIR must address and analyze all significant direct and indirect impacts caused by the Project, which include all reasonably foreseeable impacts. *See* CEQA Guidelines §§ 15126, 15358. As noted above, there are outstanding proposals to expand the I-710, SR-47, and to build a huge new intermodal facility for BNSF next to the ICTF site – all with the same objective: to increase throughput at the Ports.

Under CEQA, it is improper segmentation of this Project to examine only a discrete component of a much larger project. *See* CEQA Guidelines § 15130. The environmental effects of a potential future expansion must be considered where, as here, the expansion "is a reasonably foreseeable consequence of the initial project; and the future expansion . . . will be significant in that it will likely change the scope or nature of the project or its environmental effects." *Laurel Heights Improvement Ass'n of San Francisco, Inc. v. Regents of the Univ. of California*, 47 Cal.3d 376, 396 (1988). The potential expansion of this Project and the SCIG project to create a super yard meets these two requirements, and must be addressed in the EIR. Furthermore, if expansion to create a super yard would entail increased capacity, the effects of such increased capacity must be taken into account.

Further, as you know, CEQA requires that an EIR address growth-inducing effects of a proposed project. *See* CEQA Guidelines § 15358(a)(2). Here, the NOP makes clear that this Project is intended to enable the Ports to accommodate anticipated growth in containerized cargo. Where a project will enable growth that itself implicates environmental impacts, those impacts must be considered in the EIR, even if such impacts will occur "later in time." CEQA Guidelines § 15358(a)(2). The proposed ICTF expansion is intended to facilitate the accommodation of growth up to 300 percent at the ports in the next two to three decades. Thus, the EIR must address environmental impacts of growth at the ports and related increased container movement.

8. The EIR must contain a comprehensive health risk assessment.

This proposed Project will generate a tremendous amount of diesel exhaust from trucks, yard equipment and locomotives. Recent health risk assessments for the existing ICTF facility and the SR-47 project, as well as the AQMD's MATES III study, have shown dramatically the plight of people who live near the ICTF project. Given this, a formal health risk assessment should be completed that evaluates the health risk not only from activities at and near the Project site, but also from the trucks that would deliver containers to the Project and trains that will use the Project site. The HRA must also assess the cumulative risk from other sources in the region, including the cumulative risk posed from the growth at the Ports that this Project will enable.

9. Environmental justice impacts must be considered in the EIR.

The proposed Project Site is located near two low-income communities of color: west Long Beach and Wilmington. According to the 2000 census, Latinos, African-Americans, Asians, and other non-white ethnicities represent over 85% of the population in these communities. However, the NOP does not make clear that the EIR will assess and mitigate environmental justice impacts.

The California Air Resources Board recently observed that "[t]he Californians who live near ports, rail yards, and along high traffic corridors are subsidizing the goods movement sector with their health." *See* CALIFORNIA AIR RESOURCES BOARD, DRAFT EMISSION REDUCTION PLAN FOR PORTS AND INTERNATIONAL GOODS MOVEMENT IN CALIFORNIA, Chapter 5, at1, (Dec. 1, 2005). Wilmington and west Long Beach are already burdened by all three of those pollution sources—including the Port of LA, Port of Long Beach, the 710 freeway, the Terminal Island Freeway, and the existing ICTF facility, addition to the nearby refineries. Of particular concern in this area are the adverse health effects of diesel emissions. The EIR must consider and implement mitigation measures to eliminate all environmental justice impacts implicated by the proposed Project, taking into account impacts introduced by the Project itself as well as cumulative impacts that arise from existing and foreseeable future sources of air, light, and noise pollution—including any growth at the port that this project will enable.

10. The EIR must consider the effects of climate change on the Project, and the effect of the Project on climate change.

As the California Attorney General and many others (including the most recent port-related DEIS/DEIRs from the Port of Los Angeles and the United States Army Corps of Engineers) have recognized, CEQA requires an analysis of the global warming impacts of a

project. California has long rejected the argument that environmental analysis can be ignored if the contributions of a project to a large scale problem are small. See, e.g., *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692 (1990); *LAUSD v. City of Los Angeles*, 58 Cal.App.4th 1019, 1025 (1997); *Communities for a Better Environment v. Cal Resources Agency*, 103 Cal.App.4th 98, 120 (2002); and *Massachusetts v. EPA*, 127 S.Ct. 1438, 1457 (2007).

Here, with proper modeling, the additional CO2 emissions caused by the proposed increase of truck and train traffic associated with the Project can be estimated. Moreover, the potential effects of global warming such as an increase in sea levels and an increase in temperature may have an effect on the Project can and should be considered. At minimum, the EIS should analyze the effect of the Project on compliance with AB32, California Executive Order S-3-05 (which requires all State agencies to "consider and implement strategies to reduce their greenhouse gas emissions"), and the global warming / climate change action plan prepared by the Villaraigosa administration in May, 2007.

11. The EIR should contain a discussion of whether the Project makes economic sense in view of current and projected economic conditions.

Cargo throughput at the ports of Los Angeles and Long Beach has declined significantly, calling into question whether the proposed project is necessary. A February 23, 2009 article in the Journal of Commence states: "Los Angeles, the nation's largest container port, reported a 6 percent drop in volume in 2008 and neighboring Long Beach, the second-largest port, was down 11.2 percent. The bleeding is expected to get worse this year, with Long Beach's volume down 23 percent in January and Los Angeles down 10 percent for the month." Accordingly, the EIR should assess the need for a project of this magnitude in light of the current economic downturn.

Moreover, the Ports' joint Rail Study Update (December 2006) calls into question whether any additional rail projects are needed at this time. The Study concluded that additional rail infrastructure on Terminal Island or near dock rail facilities like SCIG or the UP Expansion are needed because the ports' rail infrastructure will reach capacity between 2010 and 2015. But this conclusion was based on the faulty assumption of near exponential growth at the ports (the Rail Study Update assumed a nearly 500% increase in TEU throughput between 2000 and 2030).

Further, as noted above, even if additional rail infrastructure is needed to accommodate increased trade after the current economic downturn, the EIR should consider whether the Port of Los Angeles Terminal Island Intermodal Facility or the Port of Long Beach Pier T Mole Expansion (also on Terminal Island) could adequately satisfy the ports' rail infrastructure needs. Given that both of these projects are located on port property and further in distance from sensitive receptors than the current project, either of these Terminal Island projects would likely be preferable from an environmental and public health standpoint to the currently proposed project. Moreover, the Rail Study Update determined that one of these two rail projects could accommodate the ports' rail infrastructure needs through 2020. Given that this determination was based on faulty growth assumptions, either of the Terminal Island projects could very well accommodate any future growth at the ports well past 2020—making the proposed UP Expansion unnecessary. And given

the ports' stated commitment to increasing on-dock rail, the Terminal Island projects would be a preferable alternative.

The EIR must reassess whether there is a pressing need for the proposed project and if so, whether there are other less environmentally damaging alternatives. The ports' own Rail Study Update clearly indicates that such alternatives exist.

Thank you for your consideration of these comments.

Sincerely,

David Pettit
Senior Attorney
Natural Resources Defense Council

Colleen Callahan
Manager of Air Quality Policy and Advocacy
American Lung Association in California

Jesse N. Marquez
Executive Director
Coalition For A Safe Environment

Candice Sung Kim
Senior Campaign Associate
Coalition for Clean Air

Ryan Wiggins
Campaign Associate
Communities for Clean Ports

Angelo Logan
Executive Director
East Yard Communities for Environmental Justice

Frank O'Brien
Executive Director
Harbor Watts EDC

Elina Green, MPH
Consultant
Long Beach Alliance for Children with Asthma

Kathleen Woodfield
Vice President
San Pedro and Peninsula Homeowner's Coalition

Attachment

cc: Dr. Geraldine Knatz
Tom Russell
Councilwoman Janice Hahn
Richard Steinke
Dominic Holzhaus
Barry Wallerstein
Susan Nakamura
Andrea Hricko

April 29, 1996

The Honorable William J. Clinton
The White House
1600 Pennsylvania Ave., NW
Washington, DC 20500

Dear President Clinton:

As members of the Green Group, an association of leading national environmental organizations, we are writing to ask that the Department of Transportation disapprove federal funding for the 710 Freeway in southern California.

. . . . . By any standard -- cost, transportation efficiency, environmental effects, impact on communities and historic neighborhoods, and the existence of viable, less costly alternatives -- the Department of Transportation should not approve the 710 Freeway. Equally important, controversy over the 710 Freeway has continued now for thirty years. Residents of Pasadena, South Pasadena, and El Sereno have lived with the constant threat and uncertainty of the freeway devastating their communities. . . . . .

Accordingly, we respectfully request that the Administration resolve the fate of the 710 Freeway and protect the adjacent neighborhoods by disapproving federal funding for the project. We would be delighted to provide any additional information that would be helpful to you. We thank you for your leadership in defending our natural and cultural heritage.

Sincerely,

John H. Adams
John Adams
Executive Director
Natural Resources Defense Council

Richard Moe
Richard Moe
President
National Trust for Historic Preservation

Brent Blackwelder
Brent Blackwelder
President
Friends of the Earth

Carl Pope
Carl Pope
Executive Director
Sierra Club

Fred Krupp
Fred D. Krupp
Executive Director
Environmental Defense Fund

Martin Rosen
Martin Rosen
President
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Barry R. Wallerstein, D.Env.
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February 17, 2009

To: I-710 Technical Advisory Committee

Re: I-710 Project EIR Alternatives

We are writing to provide comments of the South Coast Air Quality Management District (AQMD) staff regarding project alternatives to be considered in the I-710 project EIR. We intend these comments to assist the lead agency in developing an EIR and achieving a project approval that will address the region's serious environmental and congestion challenges, and receive the broad public and governmental support needed for successful implementation. In brief, our comments recommend that the EIR include and evaluate three zero-emission transport technology alternatives. These technologies are (1) electrified rail, (2) a fixed-guideway advanced technology such as maglev, and (3) electric trucks. The optimal project may include a combination of these technologies and highway lanes. Thoroughly evaluating all of these alternatives in the EIR will allow the lead agency to identify and adopt such an optimal combination.

Background

AQMD staff views the I-710 project as a critical element of Southern California's efforts to ensure mobility and enhance public health. The project is located in the primary international goods movement corridor in Southern California – a corridor near the marine terminus of rail and highway transport facilities that traverse the region and carry over 40% of the nation's containerized imports. The corridor is heavily impacted by pollution and congestion. The choices of transportation technologies for this corridor will impact millions of persons, locally and regionwide. Moreover, due to its location, the project presents a *singular opportunity* to begin deployment of beneficial technologies regionwide. Properly designed, the project can reduce dangerous emissions, as well as achieve co-benefits in furthering state and federal goals of mobility, energy efficiency, reduced petroleum dependence, and greenhouse gas emissions reduction.

AQMD's primary concern is air quality impacts. The following are key facts about the project's air quality setting:

- *Mobile Sources Contribute to Serious Health Impacts.* Mobile sources such as trucks, locomotives and automobiles create the vast majority of air pollution in the South Coast Air Basin. One type of pollutant, fine particulates, is estimated to cause 6,200 premature deaths in the Basin *every year*.[1] The average reduction in life span for such persons is estimated by the California Air Resources Board and the U.S. Environmental Protection Agency to be 14 years.

- *Health Risks Near Transportation Facilities.* The California Air Resources Board identified diesel particulate matter as a toxic air contaminant in 1998, due to carcinogenic risk. The AQMD *Multiple Air Toxics Exposure Study* (MATES III) shows that diesel particulate matter is the overwhelming contributor to regional cancer risks from air pollution which average 1,200 in a million.[2] This is hundreds of times higher than risk levels allowed for stationary sources under AQMD rules (between and 1 and 25 in a million). The highest risks from air pollution are found near highways and other transportation facilities such as the I-710, because of heavy reliance on diesel-powered mobile sources. Persons in highly polluted portions of the basin, and persons near transportation facilities anywhere, also suffer greater risks of reduced lung function and many other serious health effects.

- *Federally-Required Emission Reductions & "Black Box."* To attain national air quality standards as required by federal law, this region must reduce nitrogen oxides emissions by approximately two-thirds *beyond the levels that will result from all the stringent rules adopted to date by federal, state and local agencies.* SCAQMD, CARB and SCAG have not been able to identify sufficient specific measures to meet this need, and the region's Air Quality Management Plan thus includes a large "black box" federal Clean Air Act commitment of needed but unidentified control measures. The black box includes over 200 tons of NOx reductions, an amount that exceeds the region's entire federal ozone standard "carrying capacity."[3] Under federal law, the black box will need to be replaced by specific emission control strategies. Emissions from trucks and locomotives will comprise a substantial portion of total emissions in 2024, the year federal law requires attainment of the ozone standard. The region's Air Quality Management Plan thus identifies non-combustion zero-emission transport technologies as a potential means to fill the black box.

In sum, this region needs every possible emission reduction from goods movement and other mobile sources. This must include zero-emission technologies wherever possible.

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[1] California Air Resources Board, 2008 (mean estimate).
[2] SCAQMD Mates III analysis, 2008
[3] I.e. the maximum level of emissions that can occur if the region is to meet the federal standard

Comments on Alternative Technology Alternatives

For the above reasons, AQMD staff urges that the I-710 project EIR provide decisionmakers with thorough information regarding the feasibility and impacts of employing zero-emission technologies. Our specific comments are provided below:

- ***A sufficient variety of alternatives involving transport powered by electricity should be included in the EIR to maximize the potential for inclusion of such technologies as part of the project.*** "Alternative" technology transportation systems powered by electricity would provide substantial air quality benefits due to the lack of any diesel particulate emissions (which cause significant local cancer risks), and the greatly reduced criteria pollutant emissions – particularly since emissions from electric generating plants in this region are well-controlled through use of selective catalytic reduction NOx controls and natural gas fuel. Electrification would also create substantial co-benefits in reducing carbon emissions, which would assist the state and region in implementing AB 32 and SB 375. *We thus strongly urge that a sufficient variety of zero-emission alternatives be included in the EIR, as discussed below, to maximize the potential for identification of a system that could successfully be incorporated into the final approved project.*

- ***At least two zero-emission fixed-guideway alternatives – an advanced technology such as maglev and electrified rail – should be evaluated in the EIR.*** The types of fixed-guideway systems to be thoroughly evaluated as EIR alternatives should, at a minimum, include (1) a broadly-proven technology, electrified rail, and (2) an advanced technology such as maglev that may provide additional benefits or be more suited to regional needs. Evaluating both types of fixed-guideway technologies will maximize the possibility of identifying a configuration that can be successfully implemented. The two types of technologies would likely pose differing advantages and disadvantages, e.g. cost, ability to incorporate into existing transport routes, and ability to implement through an elevated guideway if that is determined necessary. The two types of technologies also may have differing potential for phased expansion to the rest of the region. *We strongly urge that potential for expansion be a key criterion for the ultimate technology decision* since a regionwide zero-emission system may be the only way to achieve long-term pollution, energy, congestion and climate needs. Consistent with these needs, the Regional Transportation Plan proposes a regional transport system that would be electrified.

  Alameda Corridor Electrification. One configuration that should be evaluated, at least as a partial solution, is electrification of the Alameda Corridor. The Corridor was constructed so as to accommodate electrification. We recognize that the Corridor is used by trains bound to and from points outside of the region, and that much of the I-710 traffic serves points within the region. But such additional use for the Corridor should at least be evaluated since this would be an obvious (and

possibly less expensive) means of electrifying a significant portion of cargo transport.

Zero Emission Technologies Are Available Today. Finally we wish to note that, while some zero emission technologies have yet to be commercialized (e.g. electric trucks), technological advances are occurring quickly. In addition, some zero-emission technologies, notably electrified rail, have been widely deployed for decades. To illustrate the point, we have attached photos of electrified freight transport systems in England, France, Russia, Italy, Slovakia, Russia, Australia and Japan (there are examples in many more countries). These systems carry many types of freight, including cargo containers, and in some cases cross mountainous terrain. We found examples of electrified freight rail systems that were constructed as long ago as 1922. Electric locomotives have similar or lower cost and are easier to maintain than diesel locomotives. We have also attached photos of "dual mode" locomotives in operation in U.S. passenger service that operate solely on electricity in New York City stations and tunnels due to restrictions on diesel exhaust in those facilities. New Jersey has ordered similar equipment. Such locomotives "seamlessly" transfer to diesel power when operated elsewhere. This technology can be used to phase-in electrification of current infrastructure since electrified track can be shared by diesel locomotives. The attachment also includes an image of the passenger maglev system currently in operation in Shanghai. *Clearly, electric transport technologies are available today and should be thoroughly evaluated in the I-710 EIR.*

- ***Electric trucks should be one alternative evaluated in the EIR.*** The AQMD supports development and deployment of electric trucks. We currently are engaged in projects, co-funded by the ports and AQMD, to develop electric drayage trucks and yard hostlers. Such technology has the potential to move cargo where fixed rails cannot and would avoid local and regional emissions impacts. The category of heavy-duty trucks is currently the largest source of NOx emissions in the Basin. Unless cleaner technologies such as electrification are employed, trucks will still be among the top three source categories for NOx in 2024 (the federal ozone attainment deadline) despite years of implementation of stringent new-vehicle emissions standards and truck replacement/retrofit rules. Zero-emissions technologies thus should be deployed to the extent feasible for this large emissions category.

  While we support deployment of electric trucks, we view electric truck technology as a supplement to, not a replacement for, fixed-guideway systems. Our reasons are threefold:

  - First, there will always be a need to move substantial cargo from the ports to locations beyond the economic range of trucks.

- Second, the region should remove as many trucks as possible from the roads, both to reduce traffic congestion, and to cut energy use and associated emissions; *this should be a key design goal of the project*.

- Third, maximizing transport of cargo (and, if possible, passengers) by fixed guideway could reduce the need to construct additional highway lanes; this, in turn could free up space and funds to construct zero-emissions fixed guideway transport systems

- ***The EIR Should Fully and Concurrently Evaluate all Alternatives Described Above.*** Finally, we wish to caution against any unnecessary "phasing" of the evaluation of zero-emission alternatives which could result in other portions of the I-710 project (i.e. lane expansion) proceeding to project-level analysis, possible approval, and construction, prior to full evaluation and potential decision regarding the zero-emission alternative. Highway lanes and alternative transport systems are highly interrelated. The capacity of one could affect the usage of the other, and environmental impacts from expansion of the highway capacity could be mitigated or otherwise altered by deployment of alternative technology systems.

Thank you for your consideration of these comments. We look forward to working with the Committee to fashion an environmental document, and a project decision, which successfully meets the needs of this region.

Please contact Susan Nakamura, Planning and Rules Manager, at (909) 396-3105 or Peter Greenwald, Sr. Policy Advisor, at (909) 396-2100 if you have any questions or comments.

Sincerely,

Barry R. Wallerstein, D.Env.
Executive Officer

BRW/PG

Attachment

ATTACHMENT

Electrified Freight Rail Examples

Italy

http://www.interportopd.it/scripts/interportopd.asp?cat=intermodalita&tipo=Ferroviario&tab=intermodalita&sezione=Traffico_Ferroviario

Channel Tunnel - Britain/France

http://www.skyscrapercity.com/showthread.php?t=576900&page=2

Japan

http://picasaweb.google.com/lh/photo/Y_edNCkULEYQwyv3-FzyFw

Germany

http://en.wikipedia.org/wiki/File:Db-152073-00.jpg
http://creativecommons.org/licenses/by-sa/2.5/
http://commons.wikimedia.org/wiki/Commons:GNU_Free_Documentation_License

Switzerland

(constructed in 1922)

http://en.wikipedia.org/wiki/File:Biaschina_Intermodal.jpg

Russia

http://www.skyscrapercity.com/showthread.php?t=576900&page=2

Slovakia

http://www.skyscrapercity.com/showthread.php?p=31901680

Austria
(Note trucks being carried)

http://www.skyscrapercity.com/showthread.php?t=576900&page=2

Britain

http://en.wikipedia.org/wiki/British_Rail_Class_92

France

http://www.rail-be.net/Accessoires/Webs_Files/Alan.htm

Australia

Siemens press release:

Electric locomotives

Feb 10, 2006

Siemens makes the transport of coal more efficient by modernized electric locomotives. A new traction technology offers more power, more effort and more profitability to the fifth continent. In the past five locomotives hauled a train with a length of five kilometers and a weight of more than 13.000 tons. In the future three modernized locomotives will do the work of five former locomotives. The new locomotives which will have an economic lifetime of 20 additional years will do their work at Goonyella in eastern Australia where coal is conveyed by surface mining.

Reference Number: sots200603-02

http://w1.siemens.com/press/en/pp_ts/2006/sots200603_02_(innovationnews)_1352530.htm

Note: Siemens states the locomotives pull five-kilometer long coal trains to the coast where cargo is loaded onto ships, a trip of 200 to 300 kilometers.

Dual - Mode Locomotives: Third Rail Power

(Full-electric operation only when in New York City
tunnels & stations *due to diesel exhaust restrictions*)

General Electric P32AC-DM operated by Amtrak. In New York City, where diesel emissions in tunnels approaching Penn Station and Grand Central Terminal are not permitted, operates on "third rail" electric power. Elsewhere, operates as a diesel-electric locomotive. Seamlessly transitions while underway. Rated at 3,200 hp (2,390 kW) and can obtain a maximum speed of 110 mph.

http://tripatlas.com/GE_Genesis#P32AC-DM

Dual - Mode Locomotives: Overhead Catenary Power

http://en.wikipedia.org/wiki/SNCF_Class_B_82500

Bombardier B 81500: dual-mode variant, capable of running on both diesel (by means of a diesel-electric engine) and 1.5 kV DC (by means of a pantograph). It has been in operation since

2005 on passenger lines in France. In July 2008, New Jersey Transit approved the purchase of 26 Bombardier dual-mode locomotives to replace its aging diesel fleet.

Shanghai Passenger Maglev System

http://www.drives.co.uk/news/worldnews/news_worldnews208.htm

Additional Support Documents for Declarative Statements (Links)

710 tunnel is about Goods Movement, Freight Trucks

SCAG memo February 17, 2005 To: Plans & Programs Technical Advisory Committee, From: Nancy Pfeffer, Senior Regional Planner, RE: Goods Movement White Paper for Secretary of Business, Transportation & Housing
In 2004, Governor Schwarzenegger was "criticized by government and business leaders in Asia for allowing congestion at the San Pedro Bay Ports to impede the flow of goods from Asia to U.S. markets. On his return he tasked BT&H Secretary, Sunne Wright McPeak with developing a strategy on this issue."

http://articles.latimes.com/2007/feb/13/local/me-roads13
State's future may be paved with fees
Evan Halper, February 13, 2007, LA Times
Under pressure from Gov. Arnold Schwarzenegger, who has been pushing for the state to start shifting the cost -- and some control -- of road building to the private sector, lawmakers last May authorized government agencies to build four demonstration projects in partnership with investment banks, shipping companies and other businesses….The Legislature has yet to sign off on what roads would be built under the arrangement, but has stipulated that they must serve the movement of goods…The California Department of Transportation is already suggesting a toll road for trucks that would go from the Port of Long Beach to the Inland Empire, and a toll road for cars and trucks at the Mexican border near San Diego that would have its own border crossing…State and local transportation planners have joined with the governor's office to lobby lawmakers for authority to broker more deals with private companies

http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/reports/fFinance_AppF_02_SR710.pdf
SR-710 Tunnel Financial Feasibility Assessment SCAG RTP 2008
PDF pg 5 please see section 2.7, especially the second paragraph: "Due to the importance of truck traffic on the SR-710 and to provide another east-bound connection for freight, it is critical to allow truck traffic in the tunnel."

http://www.scag.ca.gov/rtp2004/pdfs/techappendix/appendix_E.pdf
Appendix E Goods Movement 2001 RTP Technical Appendix, Southern California Association of Governments May 2001
Freight Issues, Implications and Options in the Moving Forward Document Starts on PDF pg 28-31 (doc E-26 E-29)
A potential solution is to modify the Interstate 710 gap closure project with the construction of four bored tunnels under South Pasadena… Trucks would be allowed to use the I-710 project thus modified, so that direct 710-210 truck movements are possible, permitting trucks to bypass downtown Los Angeles… A toll on cars and trucks would be used to pay for the additional cost of the bored tunnels above and beyond the expenditures for the cut-and-cover underground roadway through South Pasadena… If truck lanes are implemented on the 710 Freeway from the San Pedro Bay Ports to downtown Los Angeles, such truck lanes would logically be extended northward to use any such bored tunnels as might be incorporated into the gap closure project--allowing easy access from the 710 Freeway to the 210 Freeway.

http://www.metro.net/images/lrtp_techappendix.pdf
2001 Long Range Transportation Plan For Los Angeles County
Technical Document, Los Angeles County Metropolitan Transportation Authority
6-6 2001 Long Range Transportation Plan For Los Angeles County
(PDF pg 132) Of the goods coming through the ports of Long Beach and Los Angeles, approximately 80% of those goods pass through the Gateway Cities either by train or truck. Port-related truck traffic is the leading cause of congestion on all of the major freeways within the sub-region but especially the I-5, I-710 & I-605 corridors regardless of time of day. Currently, trucks account for 45 to 60 percent of freeway capacity, and this traffic is expected to grow substantially due to expansion of the Ports, interstate freight movement, weekday commute traffic and weekend recreational traffic.

http://www.scag.ca.gov/goodsmove/pdf/2008/gmtf052108fullagn.pdf
Goods Movement Task Force Of The Southern California Association Of Governments, Wednesday, May 21, 2008 *9:30 a.m. – 11:30 a.m.*, February 20, 2008 Minutes

Pg 9PDF (Pg 6 of the Doc)
Missing Link Truck Study
Mr. Viggen Davidian, Iteris, Inc., began by giving an update on the progress of the project, noting it was 50% complete and on-schedule to be finished by the June 30, 2008. Mr. Davidian began by describing the I-710 gap and the potential for the construction of a tunnel to close the gap between the I-710 freeway and the I-210 freeway based on previous study. He emphasized that the purpose of the study was to evaluate the full effects of the connection and its various options, specifically in relation to truck impacts.

http://www.usc.edu/schools/sppd/keston/research/documents/710FinancingCharretteFinalReport_1-28-07_.pdf
Financial Planning Charrette 710/210 Tunnel Connection
USC Keston Institute for Public Finance and Infrastructure Policy, Louise Nelson Dyble, Ph.D., December 5, 2007 The University Club University of Southern California, Meeting Summary, The Keston Institute for Public Finance and Infrastructure Policy, University of Southern California
PG 2-5 PDF (Pg 1-4 doc) The tunnel would serve to connect two major interstate freeways, closing a critical 4.5-mile gap in the regional highway system. Interstate 710 or the "Long Beach Freeway" is a major goods-movement corridor and an important north-south route extending from the City of Long Beach area in the South, through Los Angeles… The tunnel would continue the route… descend in Alhambra, continue underground beneath the city of South Pasadena, and emerge in Pasadena to connect to Interstate 210,… The historical overview presented by Mr. Huddy (SCAG) was followed with data on current traffic estimates and cost estimates… Traffic estimates indicate that the tunnel would immediately attract significant traffic between the port area and Los Angeles heading toward major national distribution centers in San Bernardino County… and also eliminate the current bottleneck where I-710 currently ends in South Pasadena. The MTA was represented at the meeting by Linda Hui, Transportation Planning Manager of the San Gabriel Valley Area Team, and Caltrans District 7 was represented by senior engineer Abdi Saghafi, route 710 corridor manager, both of whom contributed informal assessments of current prospects and progress.

http://www.lacanadaflintridge.com/docfiles/city/cc_na_mis_090721_092848.pdf
I-710 Missing Link Truck Study Traffic Analysis for the Arroyo Verdugo Subregion With and Without the I-710 Gap Closure Preliminary Draft Final Report
Submitted by Iteris In Association with the KOA Corporation, May 2009, Submitted to Southern California Association of Governments
Note - Study was done to look at the effect the I-710 "gap closure" would have on the roadway system of the communities surrounding the project.
In it, it states that the "gap closure" Truck lanes would allow trucks to bypass the downtown area for trips "to and from the Central Valley and Northern California areas" and increase traffic to the area.

http://www.everythinglongbeach.com/metro-transportation-projects-2011/
Metro's Freeway Projects Mean Better Transportation For Everyone
By Editor 2011-03-24
"Transportation from The Ports -…710 north gap closure between the I-10 and the I-210 would complete the natural goods corridor that was begun several decades ago"…. 'designed primarily to address the demands of commerce' "specifically goods movement from the twin ports of L.A. and Long Beach"
"While this year's 18 projects and the I-405 are designed primarily to give people a better commute, three other high-profile projects in various planning stages but not yet scheduled, address the demands of commerce — specifically goods movement from the twin ports of L.A. and Long Beach, the two busiest ports in the country…
The I-710 south from the Pomona Freeway (SR-60) to the Ports of Los Angeles and Long Beach will involve a freeway widening and possibly a separate freight corridor that could be tolled.
The 710-north gap closure between the I-10 and the I-210 would complete the natural goods corridor that was begun several decades ago. Metro has been holding a series of conversations and outreach with the community, in an effort to collect ideas on best options.
A third, the High Desert Corridor, will be a brand new 63-mile east-west freeway between SR-14 in Los Angeles County and SR-18 in San Bernardino County. It would create a shortcut for goods movement from the Central Valley to the rest of the United States and trim back goods congestion through the L.A. basin."
Note - IN FACT here they state it is not about the "commute", which this year's highway projects are designed to address, but that the 710 is about "commerce"

http://narc.org/uploads/Annie Nam_Financing.pdf
Freight Planning and Investment Strategies in Southern California
Annie Nam, Manager of Transportation Finance & Goods Movement, 2008, SCAG
Pg 4 - Over 70% of imports pass through to other markets. Ports handle one third of all container traffic in U.S. and nearly two-thirds of containers from Asia. Pg 5 - Dramatic Increase in U.S. Maritime Trade. Pg 6 - Projected Container Growth Expected to Triple for LA/Long Beach - 42.5 In Million TEUs by 2030 - Source: POLA, POLB. Pg 7-8 - Goods Movement Congestion - Daily Truck Traffic to/from LA/LB Ports Will Grow Dramatically 92,000 by year 2020 Source: Gill V. Hicks Associates. Pg 9 - Truck Travel on Southern California Highways - 115% Increase 2000 to 2030. Pg 13 - Moving Freight Faster via East-West Corridor and I-15 Strategic RTP. Pg 22 - Potential Funding Sources - User Fees: Tolls, TEU Fees, Railroad Contribution. Public Funding & Financing: Existing Sources (Federal and State Contributions, County Transportation Commissions), Financing Provisions in SAFETEA-LU (Private Activity Bonds). Pg 23 - LA/LB (Ports) At what point would fees used to finance infrastructure divert business elsewhere?

http://www.metro.net/projects_studies/710_final_report/images/appendix_p.pdf
APPENDIX P I-710 Major Corridor Study "Hybrid" Alternative (Locally Preferred Strategy) Technical Report
Gateway Cities Council of Governments, Metro, April 2004, Final Report, March 2005
PDF Page 7 Doc pg 1 Section A Introduction, Background And History Introduction
The I-710 Freeway is a vital transportation artery, linking the Ports of Long Beach and Los Angeles to the Los Angeles region and beyond.

http://www.wsdot.wa.gov/NR/rdonlyres/5A019EA4-50EF-4286-96F9-05398B52608A/0/_DR1_WCCC_TradeandTransportationStudy_COMPLETEweb.pdf
http://www.scag.ca.gov/goodsmove/pdf/Summary_GM_Priorities.pdf
West Coast Corridor Coalition Trade and Transportation Study final report
prepared for West Coast Corridor Coalition, *prepared by* Cambridge Systematics, Inc, April **2008**
Southern California Consensus Priority Goods Movement Projects (May 2005)
Southern California Association of Governments
Lists 5 rail projects ($2.425 Billion), 5 highway projects ($1.321 Billion) and ITS Enhancements (Cost TBD) total cost: (w/o ITS) + $3.75 B. This one-page summary document also notes that the Multi-County Goods Movement Action Plan will study an east-west truck way linking proposed I-710 truck lanes with potential truck lanes on I-15.

http://www.longshoreshippingnews.com/2010/04/battle-looms-over-tunnel-to-finish-la-area-freeway/
Longshore & Shipping News Covered the article from the From the Associated Press, April 21, 2010 titled http://www.businessweek.com/ap/financialnews/D9F8678O0.htm "Battle looms over tunnel to finish LA-area freeway" Advocates and opponents are gearing up for battle over a plan to dig a tunnel to complete a Southern California freeway…what we need are smart solutions and sustainable modes of transit."
Note - Article is the Longshore & Shipping News because they know it would be a shipping route

Goods Movement Facts

http://ops.fhwa.dot.gov/freight/freight_analysis/nat_freight_stats/docs/05factsfigures/pdf/fff2005.pdf
Freight Facts and Figures 2005
U.S. Department of Transportation, Federal Highway Administration, Office of Freight Management and Operations
Snapshot of the volume and value of freight flows in the United States, the physical network over which freight moves, the economic conditions that generate freight movements, the industry that carries freight, and the safety, energy, and environmental consequences of freight transportation.

Route Neutral Assessment is a Sham

Zone 3, the original Meridian Route, has already been chosen as the preferred route for completion of "the gap", as stated by Gloria Molina at the December 9, 2009 Metro Board meeting. Metro tapes of the meeting, when later requested, were reported to have been "lost" – but a recording of the comment was made.

http://www.710gap.com/
Well-paid pro-Freeway tunnel lobbyist Nat Read has given the visuals for the predetermined route on his website. Nat Read's "Gap Map" screen shot recorded 2011-3-20 at 8.45.58 PM.png

http://www.metro.net/projects_studies/route_710/feasibility_assessment.htm
Google Cache Feb 2, 2010 12:24:35 GMT – saved PDF
Route 710 Tunnel Technical Feasibility Assessment
Metro has completed the feasibility assessment of a tunnel alternative to extend the 710 Freeway from its current terminus at Valley Boulevard in the City of Los Angeles to 1-210 in the City of Pasadena. *(Note - Location not neutral in this statement; they were claiming one of the Zone 2 connections would be to the 2 freeway!)* Over the past year, Metro staff, In coordination with its consultant team, has been conducting a preliminary feasibility assessment of a bored or mined tunnel to extend the Route 710…. The technical feasibility assessment considered a myriad of tunnel alternatives with construction costs ranging from approximately $1.3 billion to $3.6 billion (2006 dollars).

Impact of Trucks

http://www.dot.ca.gov/hq/tpp/offices/ogm/products_files/GGDP_Final_Report.pdf
Global Gateways Development Program State of California Business, Transportation & Housing Agency California Department of Transportation Division of Transportation Planning Office of Goods Movement January 2002 As requested by Resolution Chapter 158, Statutes of 2000 (SCR 96, Karnette)
PDF pg 6 (doc pg 2) Goods Movement Challenge
Port container traffic and air cargo volumes are expected to triple by 2020, while overall goods movement volume is projected to jump 56 percent, between 1996 and 2016.
PDF pg 20 (doc pg 16)
The San Pedro Bay Ports (Los Angeles and Long Beach) rely heavily on the Long Beach Freeway (I-710) for truck access. Half of all trucks serving the San Pedro Bay Ports use I-710 which contributes to the 710 corridor having the highest truck accident rate in the State and second highest in truck volumes. These two ports combined generate about 34,000 truck trips per day.
This number of daily truck trips could exceed 50,000 by 2010 and reach almost 92,000 by 2020.

http://www.sfmx.org/support/mts/webdocs/Needs%20Report.pdf
California Marine Transportation System Infrastructure Needs
March 11, 2003 Prepared By: California Marine and Intermodal Transportation System Advisory Council, Northern California Marine Transportation System Advisory Council, Southern California Marine, Transportation System Advisory Council
PDF pg 18 (doc pg 10) Currently, approximately 34,000 truck trips/day move to/from the Ports via the I-710 Corridor (which includes the I-710 freeway and adjacent arterial streets and freeways). The total number of daily truck trips is forecast to increase to about 92,000 by 2020.
PDF pg 19-20 (doc pg 11-12) 2002 Ports Lockout Impact - For ten days, beginning at the end of September 2002 and extending through the first week of October, a waterfront labor dispute shut down West Coast ports …Roadways around west coast ports, such as the I-710 serving the Ports of Long Beach/Los Angeles, experienced severe congestion after the ports reopened.
Note - This is written by the Port's "Advisory" councils - it states that the ports rely on the 710 as a cargo route. It is a lobbying effort on behalf of the Ports to get the Federal Government to invest tax dollars towards improving their (710) freeway cargo route. When cargo trucks are taken off of our local freeway systems - commuter issues become obsolete for the 710-freeway area. (See pictures I-710 Under Normal Conditions & I-710 During Ports Shutdown)

I-710 Under Normal Conditions

I-710 During Ports Shutdown

ROAD TUNNELS AROUND THE WORLD ARE PROVEN TO HAVE INHERENT DANGER FROM FIRE, FLOOD, EARTHQUAKE & TERRORISM

Caltrans and Metro have assured the public during the Geotechnical Study outreach meetings that modern road tunnels are safe from hazards and that all contingencies will be planned for. Confidence is not high on this count as a recent release of the Cost Estimate for the proposed tunnel does not even include escape exits.

Therefore, the No 710 Action Committee **demands** that Caltrans and Metro:

Conduct comparative safety studies of a minimum of 10 similarly sized road tunnels, constructed in the same manner as the proposed SR-710 tunnel

Compile a comprehensive emergency plan outlining roles for first responders from the private operations/maintenance company and on-site fire station plus all other affected jurisdictional fire, police, and public works departments. The plan must include all actions that will be taken in emergencies due to fire, flood, earthquake, terror, or any other tragedy. The plan must also factor in costs for handling such emergencies and the amount that will be reimbursed back to the cities for manpower and equipment. Additional preventative costs include screening vehicles for flammable liquids and monitoring suspicious activity at the tunnel portals. Systems must also be in place for clearing vehicular traffic when the tunnel is shut down for maintenance or other issues

TUNNEL DANGERS

From 1947 through the 1990s, communities opposing the extension of the 710 freeway were focused on preserving the character of their neighborhoods and solving their transportation issues through other projects. Carving up the beautiful historic homes and small town businesses to send more vehicles through the area just doesn't make sense. These communities already have more than one freeway. Why add more?

In 2002, after years of litigation with the City of South Pasadena and others, Caltrans and Metro shifted their plans and began to explore the feasibility of using a bored tunnel to extend the freeway. This concept raised new concerns for the communities: huge costs, concentrated pollution emissions, but more importantly, safety. Los Angeles is well known for its high incidence of earthquakes and other natural disasters. The public now had to consider the danger of being inside a 5-mile long tunnel during a substantial earthquake, rising flood waters, or a natural or man-made fire.

Modern tunnels are built with safety features incorporated into their design. Some earth movement is expected and planned for so that the passageway is able to "flex" with a shifting environment. The amount of "flexing" that a tunnel is able to do without damage, depends on many factors. An earthquake will not collapse a well-built tunnel. The greatest risk comes from cars, trucks, and busses filled with passengers and gasoline, shaking inside the tunnel.

Every large tunnel has 24 hour monitoring of events inside, typically two, stationed control rooms, one at either end of the tunnel that are responsible for systems maintenance, observation of problems, and collection of tolls. Emergency escape exits and phones are located at intervals along the route. Most of these require a person to be “able bodied” to use. Emergency response time can vary greatly depending on the severity of the problem and level of communication and training of first responders.

Los Angeles does not currently have any long road tunnels. There are some short tunnels intermittently on area freeways where the freeway meets a rise in elevation, such as the SR-110 freeway near Dodgers Stadium or through long underpasses. The closest modern road tunnel, the Caldecott Tunnel near Oakland California, consists of three tunnels, just about 4,000 feet long. If the 710 Extension was built underground, it would have two 60-foot diameter tunnels between 4.4 and 5.4 miles, the longest road tunnel in the United States. Even the Central Artery Tunnel in Boston, also known as the Big Dig, is only 3.5 miles long. Ours will be an even Bigger Dig.

Locally, in 2007, an accident involving five big rigs in a small 550-foot long underpass tunnel on the I-5 freeway, just north of the SR-14 connector, resulted in a fireball so hot that the vehicles burned down to their cores and concrete exploded off the walls. The Los Angeles Times reported, that “fire, police and Caltrans officials spent the day trying to assess damage to the concrete but were hampered by a continuing blaze in the tunnel's center, and heavy smoke and high concentrations of carbon dioxide, particularly on the tunnel's north, or uphill, end. They could not get very far past the mouths of the tunnel.” Sadly, 3 people lost their lives and 10 others were treated at area hospitals. It was estimated that 10 to 20 people were able to flee the short tunnel on foot. This accident is a very small example of the type of emergency that can happen in a road tunnel. A longer tunnel with a higher number of trucks carrying cargo, would increase the potential for fire and death exponentially.

The Mont Blanc Tunnel between France and Italy became the focus of an investigation in 1999, when a truck carrying margarine and flour caught fire midway through the 7-mile tunnel. Apparently the driver did not notice the smoke coming from his vehicle for about a mile as opposing cars waved at him. When he finally stopped to inspect, the truck ignited, sending smoke and dangerous levels of carbon monoxide throughout the area. The drivers in the vehicles behind the truck became trapped, unable to turn around, as the smoke was drawn uphill from the grade and overcame them. The truck’s cargo of margarine volatized and fed the fire that burned at about 1800°F for 53 hours. A total of 38 people died within 15 minutes of the incident, although it was believed prior to that day that food cargo posed no transport risk; it was considered combustible but not flammable under normal conditions. However, investigators who examined this accident began to consider that even innocuous food goods and road pavement materials could become flammable when heated by fuels and other flammables, causing them to emit dangerous chemicals when burned in a contained space.

Road tunnels all around the world have inherent danger and a disturbing history of fatalities. A tunnel full of vehicles contains an average of 15 gallons of gas per vehicle. Add to that, some trucks and busses have larger 150-gallon tanks with potentially flammable cargo and plastic that becomes flammable when heated. One accident can cause a chain reaction of explosions to all of those tanks. In 2001, the 10-mile St. Gotthard Tunnel in Göschenen Switzerland had a blazing inferno that killed 11 people. The accident was a collision between a truck and an empty minibus that caused gasoline to pour onto the floor of the tunnel. The result was a blaze so hot that it melted the vehicles causing them to be fused together. It was determined that the fatalities were caused by smoke and gas inhalation and that the ventilation system had not been working properly or was not adequate for such conditions. This tunnel suffered three major accidents in three years.

The Caldecott Tunnel as previously mentioned, had a fire in 1982 that caused 7 deaths. A gasoline tanker crashed into a stopped car and gas spilled into the gutter and ignited. Smoke travelled uphill, choking the victims who didn’t have a chance to get out the emergency exits. The ventilation system

was not even on at the time although it would have been totally inadequate under these circumstances. The same tunnel in 2010 had to close during an intense rainstorm due to flooding. A drainage pipe had filled with debris from runoff and storm water backed up in the tunnel.

This type of situation is a concern for Los Angeles area residents as flooding is common throughout the rainy season. At a public outreach meeting conducted by Caltrans during the Geotechnical Study, a question was asked about how flood waters would be managed in heavy downpours in and around the tunnel. Earlier in the week, television news coverage showed that the southern end of the 710 was evacuated due to rising waters. The response by Doug Failing, Executive Director of Highway Programs at Metro, was that the 710 freeway is supposed to flood to keep water out of the area neighborhoods. He stated that it was designed that way. However, one might argue that building a tunnel at the end of a freeway that is designed to flood, could create an inescapable hazard. There are no exits in a tunnel. In addition, unlike the average freeway, when an entire tunnel section does close down for weather, maintenance or accidents, the resulting overspill of heavy cargo trucks into the local communities is devastating.

Sometimes the danger in a tunnel comes from an unexpected cause. The Central Artery Tunnel in Boston, the Big Dig, was damaged when ceiling tiles cascaded to the ground below because an inadequate glue was used to secure the 4,600-pound panels. One woman lost her life when a tile fell directly on her while riding as a passenger in a vehicle and also injuring the driver, her husband. The project manager, Bechtel/Parsons Brinckerhoff as well as others, were accused of cutting corners and doing shoddy work. There was also a great deal of discussion on whether the glue manufacturer or the glue installer were to blame for the tiles falling. The tunnel fully reopened 11 months later.

As we look to Los Angeles in the future, we must consider that a large tunnel could become the ultimate soft target for terrorists, as was the case in London in 2005. In a road tunnel, since tolls are collected electronically and there are no stops for inspection, it would be easy to trigger an explosion with just a flare and a can of gasoline. An act such as this would yield catastrophic loss of life and property. Let's be sure that the supposed benefits of this project far surpass the tremendous risks.

See Appendix C – Tunnel Dangers

Appendix C
Tunnel Dangers

References for Narrative (Links)

http://en.wikipedia.org/wiki/Big_Dig
http://en.wikipedia.org/wiki/Caldecott_Tunnel_fire
http://en.wikipedia.org/wiki/Salang_tunnel
http://www.guardian.co.uk/world/2001/oct/26/jonhenley1
http://www.landroverclub.net/Club/HTML/MontBlanc.htm
http://www.youtube.com/watch?v=VeZjMTzqNQ8
http://www.worldshipny.com/walking.shtml under “Hudson River Park”
http://www.flickr.com/photos/bencouldrey/1016957975/in/photostream/
http://www.ourbrisbane.com/transport/2370803.clem7-tunnel-ventilation-outlet-2-woolloongabba
http://www.hbi.ch/fileadmin/media/pdf/publikationen/Paper_Ilg_HBI_Gijon_2005_english.pdf

Support Documents for Declarative Statements (Links)

Tunnel Disasters

http://www.nytimes.com/1994/04/25/news/25iht-safe.html?pagewanted=1
Terrorist Attacks and Fires Present the Greatest Risks : Taking the Time To Ensure Safety
Barry James, Published: April 25, 1994
The Channel Tunnel, one of Europe's biggest construction projects, is also its biggest security headache… Because the tunnel has a single entry and exit, Mr. Clutterbuck said, there is more incentive for terrorists to "to grab the headlines by blocking it, by a terrorist act, by sabotage or by a hoax call." As in any complex underground system, the biggest danger is from fire and toxic fumes… Some chemicals, nuclear material and other potentially dangerous materials will be banned from the tunnel… If an explosion occurs, the blast would follow the path of least resistance - the tunnel itself… Every coal miner knows that the likeliest cause of death underground is not flame but toxic fumes, such as odorless carbon monoxide, which can race through a tunnel faster than a man can run. Other risks being considered include: Flooding Earthquakes.

http://en.wikipedia.org/wiki/Channel_Tunnel
Channel Tunnel
From Wikipedia, the free encyclopedia page was last modified on 8 May 2010 at 07:37
There have been three fires in the Channel Tunnel that were significant enough to close the tunnel—all on the heavy goods vehicle (HGV) shuttles—and other more minor incidents.
During an "invitation only" testing phase on 9 December 1994 a fire broke out in a Ford Escort car whilst its owner had been loading it on to the upper deck of a tourist shuttle. The fire started at approximately 10:00 with the shuttle train stationary in the Folkestone terminal and was extinguished around 40 minutes later with no passenger injuries. On 18 November 1996 a fire broke out on a heavy goods vehicle shuttle wagon in the tunnel but nobody was seriously hurt. The exact cause is unknown… although it was not a Eurotunnel equipment or rolling stock problem; it may have been due to arson of a heavy goods vehicle. It is estimated that the heart of the fire reached 1,000 °C (1,800 °F), with the tunnel severely damaged over 46 metres (151 ft), with some 500 metres (1,640 ft) affected to some extent. Full operation recommenced six months after the fire…11 September 2008 a fire occurred in the Channel Tunnel at 13:57 GMT. The incident started on a freight-carrying vehicle train traveling towards France… The event occurred 11 kilometres (6.8 mi) from the French entrance to the tunnel. No one was killed but several people were taken to hospitals suffering from smoke inhalation, and minor cuts and bruises. The tunnel was closed to all traffic, with the undamaged South Tunnel reopening for limited services two days later. Full service resumed on 9 February 2009… after repairs costing €60 million… Home Office statistics indicating that car fires had doubled in ten years… Eurotunnel has banned a wide range of hazardous goods from travelling in the tunnel. Two STTS vehicles with firefighting pods are on duty at all times, with a maximum delay of 10 minutes before they reach a burning train.

http://en.wikipedia.org/wiki/Gotthard_Road_Tunnel#History
Gotthard Road Tunnel

From Wikipedia, the free encyclopedia page was last modified on 14 April 2010 at 13:51
Owing to the enclosed space of a tunnel, fires can have very serious effects on users. The main dangers are gas and smoke production, with low concentrations of carbon monoxide being highly toxic. Fires killed 11 people in the Gotthard tunnel fire of 2001 for example, all of the victims succumbing to smoke and gas inhalation.

http://www.guardian.co.uk/world/2001/oct/26/jonhenley1
Vehicles found fused together in molten mass after tunnel inferno
European transport network left paralyzed after Swiss disaster, and key questions are raised on future policy
Jon Henley in Paris, The Guardian, Friday 26 October 2001 12.36 BST
Up to 128 people were reported to be still missing yesterday more than 24 hours after a fierce fire broke out in Switzerland's Gotthard tunnel, throwing road freight traffic in the heart of Europe into chaos. The blaze, which followed the collision of two trucks about a mile from the tunnel's southern entrance, prompted renewed demands from transporters, environmentalists and safety campaigners for an EU-wide shift from road to rail transport… Mounting fears about tunnel safety were fanned by a second crash yesterday morning just outside the 6km-long St Bernhard tunnel, the closest alternative to the Gotthard, although it is not used by heavy goods vehicles. A lorry crashed into a car and a minibus after it left the tunnel, killing the minibus driver and prompting authorities to close the St Bernhard for several hours. This effectively cut off all Italy's main road links to the north, adding to the misery of thousands of stranded lorry drivers and tourists…. The Gotthard tunnel disaster, Switzerland's worst ever, will hit European freight traffic - and Italy's entire economy - hard. The third major accident in a transalpine tunnel in as many years, it leaves two of the four main road freight routes linking Germany, Switzerland, France and Italy out of operation. Italian Transport Federation (Confetra) chief Piero Luzzati told Reuters: "This is the nightmare scenario."… France's Mont Blanc tunnel, shut since a fire in March 1999 that killed 39 people, was due to reopen before the end of the year. But it is now likely to remain closed for longer, pending stricter safety regulations in the wake of the Swiss blaze. Unmanageable. The Gotthard tunnel, used by 1.2m lorries a year and millions more motorists, is likely to be closed for weeks if not months. Swiss railways yesterday increased capacity to ease the congestion, but road freight organisations warned the situation could quickly become unmanageable. The tunnel is also fitted with a state-of-the-art fire detection system and a ventilation system that allows air in the tunnel to be refreshed, and fumes evacuated, within 15 minutes of an accident. None of that was enough to prevent the tragedy. "This accident shows us, sadly, that it is simply impossible to guarantee anyone's safety in a two-directional, mono-bore tunnel," said Louis Verdier, deputy mayor of Chamonix, at one end of the Mont Blanc tunnel. "This disaster must pose major questions about the reopening of Mont Blanc."… Survivors and rescue workers described how litres of petrol from the crumpled trucks then washed over the tunnel floor, causing a huge explosion to rip through the structure and starting a fire which blazed throughout the night…."Knowing the layout of the tunnel I quickly walked towards an emergency exit. Of course, I couldn't see anything. It was like someone had turned the lights out. But even with loudspeakers giving directions some people simply became distraught and several cars were trying to reverse. It was chaotic."… Another rescue worker Benno Beuhlmann, in charge of Uri canton's chemical accident unit, described how workers found four corpses in cars and six people who had suffocated in the emergency tunnel, tantalisingly close to exits which would have saved their lives.

http://www.google.com/images?hl=en&q=Mont+Blanc+tunnel+fire&um=1&ie=UTF-8&source=univ&ei=SbfpS7LeJo6qsgP9pInMBw&sa=X&oi=image_result_group&ct=title&resnum=4&ved=0CDUQsAQwAw
Images of Mont Blanc tunnel fire Memorials

http://www.thefreelibrary.com/Threat+of+terrorism,+accidents+turns+attention+to+tunnel+safety....-a091203782
http://goliath.ecnext.com/coms2/gi_0199-2157363/Threat-of-terrorism-accidents-turns.html
Threat of terrorism, accidents turns attention to tunnel safety. Property/Casualty: Loss/Risk Management Notes. Fire more likely in roadway tunnels than in railroad tunnels; Mont Blanc tunnel fire examined; Interview with Bill Kennedy, Brief Article
Loss/Risk Management Notes is compiled by Senior Associate Editor Lynna Goch.
Best's Review, Publication Date: 01-SEP-02
The Mont Blanc tunnel fire of 1999, which occurred on the border of France and Italy, burned for two days and killed 39 people…. The tunnels in New York--including the Lincoln and the Holland--have about one or

two car fires a year, and they are considered routine incidents… The thing that's a horse of a different color is either if you have a deliberately caused incident or, in the interest of saving time and money, a driver tries to sneak illegal cargo through the tunnel…. The 1999 Mont Blanc tunnel fire was caused by foodstuffs… a tanker full of margarine … It was not looked at as a risky cargo at all prior to that incident. Between the time of the Mont Blanc fire and the Channel Tunnel fire, I don't think the French and Italians had caught on to the fact that they had a serious risk…. The attitude of complacency, in my opinion, raises the likelihood that an event will occur.

http://www.landroverclub.net/Club/HTML/MontBlanc.htm
The Mont Blanc Disaster
41 deaths (correction 39), 52 hours burning and reached temperatures of 1000 °C (1830 °F)
Of the 41 people who died after fire swept through the Mont Blanc tunnel on 24 March, all but 7 had stayed in their cars. They were poisoned by fumes from the fire. To understand what happened you must know that there are independent control rooms, ventilation and safety systems on both sides as half of the tunnel is French and the other half Italian territory. Only every second refuge area (unpair numbers) has a sheltered gastight room with fresh air supply giving protection for 2 hours.
This is a minute-by-minute report of the incident – it is a MUST READ, but have a box of Kleenex handy – devastating.

http://www.boston.com/news/traffic/bigdig/articles/2006/07/28/bostons_emergency_routes_to_be_reviewed_after_death/
Boston's emergency routes to be reviewed after death
By Raja Mishra, Globe Staff, July 28, 2006

http://en.wikipedia.org/wiki/Salang_tunnel_fire
Salang tunnel fire
From Wikipedia, the free encyclopedia page as it appeared on 5/11/10 12:28 PM
The Salang tunnel fire occurred on 3 November 1982 in one of Afghanistan's road tunnels - the Salang tunnel - during the Soviet occupation of Afghanistan. Details are unclear, but the incident may have been one of the deadliest fires of modern times…. Initial reports detailed fuel and ordnance explosions, and the death toll was speculated as high as 2,700. The death toll was subsequently revised downwards many times…FROM SOVIET MILITARY DATABASE: On 3 November 1982 two military convoys (2211 and 2212) collided in the Salang tunnel causing a traffic jam. There were no fire or explosions. 64 Soviet soldiers and 112 Afghan people were killed by carbon monoxide emitted by idling engines.

http://en.wikipedia.org/wiki/Big_Dig
Fatal ceiling collapse
From Wikipedia, the free encyclopedia page as it appeared on 5/11/10 12:54 PM
A fatal accident raised safety questions and closed part of the project for most of the summer of 2006.On July 10, 2006, a concrete ceiling panel weighing 3 tons (2722 kg) and measuring 20 by 40 ft (6.1 by 12.2 m) fell on a car traveling on the two-lane ramp connecting northbound I-93 to eastbound I-90 in South Boston, killing Milena Del Valle, who was a passenger, and injuring her husband, Angel Del Valle, who was driving...On September 1, 2006, one eastbound lane of the connector tunnel was re-opened to traffic…The project has incurred criminal arrests, escalating costs, death, leaks, and charges of poor execution and use of substandard materials…

http://www.boston.com/news/traffic/bigdig/articles/2008/03/14/no_big_dig_copycats/
No Big Dig copycats By Noah Bierman, Globe Staff / March 14, 2008
By Noah Bierman, Globe Staff / March 14, 2008
As other cities consider removing elevated highways, activists cite Boston as a reason not to go underground…If all had gone as planned, the mayor of Seattle would don a hard hat next year and break ground on a multibillion-dollar project to replace the city's downtown overpass with a tunnel. (Boston Globe, 3/14/08)

http://en.wikipedia.org/wiki/Caldecott_Tunnel_fire
Caldecott Tunnel fire
From Wikipedia, the free encyclopedia last modified on 15 February 2011 at 22:07.
The Caldecott Tunnel fire killed seven people in the north tube of the Caldecott Tunnel, on State Route 24 between Oakland and Orinda in the US state of California just after midnight on 7 April 1982. It is one of

the few major tunnel fires involving a cargo normally considered to be highly flammable, namely gasoline….- overcome by smoke - ventilation system was not switched on at the time of the accident

http://abclocal.go.com/kgo/story?section=resources/traffic&id=7227809
Crews hope to reopen Caldecott Tunnel
Alan Wang, 1/19/10, ABC Local KGO-TV/DT
Crews dealt with major flooding issues in the Caldecott Tunnel on Tuesday and it is a problem they are hoping to resolve before Wednesday morning's commute and the next big storm.

http://www.allbusiness.com/operations/disaster-preparedness-disaster-insurance/518361-1.html
MTA failed to test before tunnel realignment.
By Rackham, Anne, Date: Monday, July 3 1995
Despite the sinkage along Hollywood Boulevard in the summer of 1994, which the Metropolitan Transportation Authority blamed on soil conditions brought on by the Northridge earthquake, the MTA did no soil tests before it set about realigning the subway tunnel in the Vermont Avenue area - now the site of a house-size sinkhole….A few hours later, a 70-foot-wide chunk of Hollywood Boulevard collapsed into a huge hole in the street…The MTA has blamed a broken city water pipe for the problem, but an engineer with the Department of Water & Power said the water main broke because of the sinkhole collapse. Any earlier water in the soil was likely groundwater that fell into the tunnel because of the construction work, said Bob Simmons of the DWP..."The fact that the water went down, instead of shooting up, proves that the cavern was already there," said Simmons. "Yes, there have been changes in the soil since the earthquake. But even the smallest leak (in a DWP main) would have shown on the surface. ... It clearly wasn't our hole. They (the MTA) may have just misestimated something."… "The (MTA) geologist said that, in hindsight, testing would have been a good idea," admitted Chesser…"The DWP has been doing business in this town the same way for years. It just doesn't make sense that all of a sudden, and only around MTA sites, their pipes would start popping," said Schneiderman. "The MTA's whole approach is they want to speed things up. They had already decided not to take precautionary measures."

http://www.allbusiness.com/north-america/united-states-california-metro-areas/481388-1.html
Hollywood business people find damage growing; subway work is suspended but cracking, sinkage go on.
By Rackham, Anne, Los Angeles Business Journal Date: Monday, December 12 1994
Hollywood Boulevard business people have been astonished to find that their buildings have continued to shift, crack and break away from the sidewalk in recent weeks, even though Metro Rail subway tunneling has been on hold for the past four months. Business and property owners say that, especially since it rained over Thanksgiving weekend, the ground under Hollywood Boulevard has been shifting, causing their buildings to move, sink and crack. Business traffic along the boulevard is dismal, and some business owners are concerned that if tunneling resumes this month on schedule, irreparable damage will follow. "Hollywood community activist Robert Nudelman speculated …that underground rivers, fueled by the recent rain, have shifted additional soil under the boulevard. He blames unstable soil conditions and "bogus" soil studies for the problems caused by tunneling -- rather than inadequate construction materials. "Nobody in his right mind would build a subway there," said Nudelman…. The owners of the 64-unit Hillview Apartments, at the corner of Hollywood Boulevard and Hudson Avenue, claim that subway tunneling-caused damage has rendered the building a total loss, and that the structure must be demolished... The MTA last August paid to house displaced tenants of the apartment building at the nearby Holiday Inn after Metro Rail crews ruptured utility lines. MTA spokesman Steve Chesser said the MTA spent $200,000 to upgrade gas lines so the apartment residents could re-enter the property… However, the MTA has denied responsibility for what the building owners claim is permanent, irreparable structural damage… Subway tunneling in August caused "cracking, pulling apart, separation, subsidence, settling, loss of use, loss of value, and other damage to the subject property," the suit alleges.
The contractors named in the suit are Shea-Kiewit-Kenny, which has the contract to dig and build the Hollywood tunnel section, and construction management firm Parsons-Dillingham.

http://www.scientific.net/AMR.150-151.719
Research on Earthquake Resistant Materials in Mountain Tunnels Crossing Fault
Jinglong Bu, Zhengyi Jiang and Sihai Jiao, October, 2010, Advanced Materials Research (Volumes 150 - 151)

http://www.springerlink.com/content/y523412634024424/
Seismic response of deep tunnels in near-fault conditions

Mirko Corigliano, April 2007, Research Doctorate in Geotechnical Engineering XIX Cycle, Politecnico di Torino
2.4. Damage Due To Fault Displacement 22, 2.5. Miscellaneous Aspects Related To Dynamic Motion 23
Even a low level of damage may affect the serviceability of a wide network. Seismic analysis of tunnels close to seismogenic faults is a complex problem, which is often neglected at the design stage for the lack of specific codes or guidelines for the design of underground structures in seismic conditions

http://www.fhwa.dot.gov/bridge/tunnel/pubs/nhi09010/13.cfm
United States Department of Transportation - Federal Highway Administration, Updated: 4/05/2011
The greatest incidence of severe damage has been associated with large ground displacements due to ground failure, i.e., fault rupture through a tunnel, landsliding (especially at tunnel portals), and soil liquefaction. Ground shaking in the absence of ground failure has produced a lower incidence and degree of damage in general, but has resulted in moderate to major damage to some tunnels in recent earthquakes… Near-surface rectangular cut-and-cover tunnels and immersed tube tunnels in soil have also been vulnerable to transient seismic lateral ground displacements, which tend to cause racking of a tunnel over its height and increased lateral pressures on the tunnel walls. Their seismic performance could be vital, particularly when they comprise important components of a critical transportation system (e.g., a transit system) to which little redundancy exists.
Adequate design and construction of seismic resistant tunnel structures, however, should never be overlooked, as moderate to major damage has been experienced by many tunnels during earthquakes, as summarized by Dowding and Rozen (1978), Owen and Scholl (1981), Sharma and Judd (1991), and Power et al. (1998), among others. The greatest incidence of severe damage has been associated with large ground displacements due to ground failure, i.e., fault rupture through a tunnel, landsliding (especially at tunnel portals), and soil liquefaction. Ground shaking in the absence of ground failure has produced a lower incidence and degree of damage in general, but has resulted in moderate to major damage to some tunnels in recent earthquakes. The most recent reminder of seismic risk to underground structures under the ground shaking effect is the damage and near collapse at the Daikai and Nagata subway stations (Kobe Rapid Transit Railway) during the 1995 Kobe Earthquake in Japan . Near-surface rectangular cut-and-cover tunnels and immersed tube tunnels in soil have also been vulnerable to transient seismic lateral ground displacements, which tend to cause racking of a tunnel over its height and increased lateral pressures on the tunnel walls. Their seismic performance could be vital, particularly when they comprise important components of a critical transportation system (e.g., a transit system) to which little redundancy exists.

http://naosite.lb.nagasaki-u.ac.jp/dspace/bitstream/10069/22249/1/NatHaz_Jiang.pdf3.2.1 Cracking of lining
Damage assessment of tunnels caused by the 2004 Mid Niigata Prefecture Earthquake using Hayashi's quantification theory
Jiang, Yujing; Wang, Chunxiang; Zhao, Xiaodong, Natural Hazards, 53(3), pp.425-441; 2010
From Table 1, we can see that almost all of the damaged tunnels suffered cracking of the concrete lining. The types of the lining cracks are longitudinal cracks, transverse cracks and inclined cracks in the arch, sidewall and roadbed. The extent of cracks is various. Slight cracks have little influence on the function of the concrete lining. But opening of cracks and buckling of the lining, inflicted spalling or collapse of the lining and consequently water leakage happened.
3.2.2 Spalling of lining
Spalling of concrete lining is the severe damage pattern in this disaster. There are three causes for spalling: space over the arch crown; imperfection of the contact between the concrete material and the rock surrounding of the tunnel; and
the aged concrete lining. The seismic shaking force is the initiation factor.

http://books.google.com/books?id=CPJC9K9unvMC&pg=PA413&lpg=PA413&dq=frequency+of+tunnel+accidents&source=bl&ots=4rt5e8Ustv&sig=Tm7mN1XgZKV-2VaPkOsOYYh3Kg8&hl=en&ei=lXFtTc-qK4OksQOg2tHGBQ&sa=X&oi=book_result&ct=result&resnum=2&ved=0CB8Q6AEwATgK#v=onepage&q=frequency%20of%20tunnel%20accidents&f=false
The handbook of tunnel fire safety, Thomas Telford, 2005 - _Technology & Engineering - 514 pages
By Alan Beard, Richard Carvel
PG 90 ...the public becomes sensitized to tunnel fires due to repeated major accidents....

http://books.google.com/books?id=JuTAZmIseeAC&pg=PA282&lpg=PA282&dq=frequency+of+tunnel+accidents&source=bl&ots=RvcNNwoV2V&sig=XW-P8qzuAsX91ieWlUiz700pa5M&hl=en&ei=s2RtTamHE5LQsAOG_NytBQ&sa=X&oi=book_result&ct=result&resnum=10&ved=0CFIQ6AEwCQ#v=onepage&q=frequency%20of%20tunnel%20accidents&f=false
The Handbook of Road Safety Measures
By Rune Elvik, Alena Hoye, Truls Vaa, Michael Sorensen, Emerald Group Publishing, 2009 -Health & Fitness,1124 pages
Factors which can make tunnels less safe than roads above-ground include: Traffic space is limited, opportunities for evasive maneuvers are small; there is no daylight, and light conditions often change dramatically when driving in and out of a tunnel; access to fresh air is reduced and steam, mist or exhaust gases can reduce visibility; in the event of accidents or fires, the escape route may be blocked and rescue work may be more difficult than on roads above ground.

http://www.nytimes.com/gwire/2011/01/20/20greenwire-200-year-flood-in-calif-more-devastating-than-80143.html
200-Year Flood in Calif. More Devastating Than Major Quake, USGS Says
By COLIN SULLIVAN of Greenwire, Published: January 20, 2011
A massive California rain event -- one expected to occur once every 200 years -- would far surpass destruction caused by a "Big One" earthquake, causing more than $700 billion in damage and hobbling the state's economy for decades, federal scientists are warning....U.S. Geological Survey scientists ran an extreme hypothetical, called "ARkStorm," through simulation models and determined that a deluge not seen in California since 1862 could potentially cause three times more damage than a large earthquake on the San Andreas Fault.

http://bpa.odu.edu/forecasting/sor/2009/2009_sor_ch7.pdf
The Tunnels that Connect Hampton Roads, bpa.odu.edu, 2009
Tunnel accident stats, Final Reflection: Accidents and Terrorism

Videos

Truck and Car Accidents in Tunnels

Envision cars and trucks stuck inside a long tunnel after an accident and the impending ventilation issues and fire possibilities with smoke traveling up the grade (acting like a chimney) in the proposed 710 tunnel. Also imagine the detours necessary through the surrounding neighborhood for those who have not yet entered the tunnel. Makes you wonder how often accidents will happen in such a tunnel. Take a look.

http://www.youtube.com/watch?v=VeZjMTzqNQ8
Seconds From Disaster - S01E02 - Tunnel Inferno _46:24 minutes
On 24 March 1999, 39 people died when a Belgian transport truck carrying flour and margarine caught fire in the tunnel. After several km, the driver realized something was wrong as cars coming in the opposite direction flashed their headlights at him; a glance in his mirrors showed white smoke coming out from under his cab. This was not yet a fire emergency; there had been 16 other truck fires in the tunnel over the previous 35 years, always extinguished on the spot by the drivers.

http://www.youtube.com/watch?v=99vKkFo_IKI
Need to be able-bodied for this: Qingdao Undersea Tunnel Evacuation (EXODUS) 1:30 min
Simulation of the undersea tunnel in Qingdao, China, visualizing an accident in the tunnel and showing how evacuees can escape the tunnel. Simulation by UC-win/Road, a FORUM8 software program, Analysis by FSEG's EXODUS.

http://www.youtube.com/watch?v=w3DA36sXT3A
CityLink Collision - Tunnel Nightmare 3:31 min
News footage, CityLink collision, Melbourne 23/03/2007

http://www.youtube.com/watch?v=AxVxGMQYeN0
http://jaimejepartage.blogspot.com/20... En Corée du Sud, un bus arrive à vive allure dans un tunnel et s'encastre dans des voitures à l'arrêt.
Accident De Bus Dans Un Tunnel!!!! : 31 min

The same tunnel In South Korea, a bus arrives at high speed in a tunnel and smashes into stopped cars.

http://www.youtube.com/watch?v=42C-Pw2HXg8
Tunnel on fire, 1:55 min, 20/1/2010, Predor Trojane, Slovenia.
3 trucks were involved in the accident, which caused fire, 5 people were taken to the hospital.
I had to take the camera off, because I had 200 grams of marijuana in the back seat and was scared of Mr. Police.

http://www.youtube.com/watch?v=weBwRewEYa4&feature=fvsr
euronews: www.euronews.net/nocomment/
Slovenia tunnel fire_:53 min

http://www.youtube.com/watch?v=58VoduuPWFk
Huge Multi-Car Pileup in French tunnel_:39 min
Dozens of cars pile up in a tunnel in France.

http://www.youtube.com/watch?v=8yJSh2B5-YU
BIKE ACCIDENT IN TUNEL_2:53 min

http://www.youtube.com/watch?v=uVZ4RxYznp4
Accident in a tunnel: Sanyo expressway, Okayama prefecture, 3:31 min
on Feb. 15, 2010, a truck slammed into the back of a patrol car near the exit of Musa tunnel on a part of the Sanyo expressway in Okayama prefecture. the accident caused the tunnel to be blocked and inaccessible. at first, there were a couple explosions rocking the tunnel, which then made everyone abandon their vehicles and escape towards the entrance of the tunnel due to smoke rapidly filling the tunnel. about an hour and a half later, everyone was taken to a highway patrol office and waited there until we could go back and retrieve their vehicles. about 4 hours later after the accident, we went back to the tunnel, reeking of burned chemicals and plastic, also leaving a dark layer of soot on everyone's car. breathing became difficult, but everyone drove out of the tunnel the same way we all came in.

http://www.youtube.com/watch?v=RvpupKheJr0&NR=1
Truck fire on PA Turnpike 6-20-08_1:01 min
4 cell phone video of truck fire at the entrance of the Allegheny Mountain Tunnel Westbound. Taken by Thatcher

http://www.youtube.com/watch?v=0FBMWE9BfqE&NR=1
[Accident] Crash in a tunnel .._:54 min
Caused by over-speed…unfortunately the driver died

http://www.youtube.com/watch?v=_yWQTbN945I&NR=1
Tunnel car truck crash_:46 min

http://www.youtube.com/watch?v=V1LM8TtSLZ0&feature=related
Melbourne Domain Tunnel truck and car crash_:50 min
This was a story on A Current Affair which was about dangerous driving. By coincidence the car that was fitted with cameras to demonstrate this was directly in front of an accident inside the Domain tunnel, so it was captured on video.
Watch the Mercedes move into the centre lane, out of view of the truck's mirrors as he indicates to change into the same lane. Once the truck moves left a collision is inevitable.
Higher quality capture available here: http://media.sensationcontent.com/row...

http://www.youtube.com/watch?v=21kBlaAvWz0&NR=1
Dubai Tunnel Accidents Video_2:03 min
Get to know the what driving in Dubai is like. Scenes inside the Rashidiya tunnel captured on video.

http://www.youtube.com/watch?v=KQkb8uMQPIY
Truck accident in tunnel_:53 min
Truck driver fall a sleep in tunnel

http://www.youtube.com/watch?v=9KUUeF8_AzQ&NR=1
Inversioni di marcia ed altro in galleria highway tunnel accident 1:39 min
Italian, the unthinkable at the end when a truck crushes three cars still in the tunnel taken from the watchful eye of big brother

http://www.youtube.com/watch?v=5wO2sApvTXc&NR=1
Russian Tunnel. Crash(es). 1:24 min
This tunnel in Russia is the longest in-city tunnel of Europe. (3,150m long Lefortovo tunnel in Russia is the longest in-city tunnel in the world. It is nicknamed 'The Tunnel of Death)'. There is a river running over it and water leaks at some points. When the temperature reaches -38 degrees outside the tunnel like it did this winter, the water on the tunnel road freezes and the result is the attached video taken during a single day with the tunnel camera.

http://www.scatnow.com/index_files/Page679.htm (Explanation)
http://www.youtube.com/watch?v=GW-8g40oLbc&NR=1
Ledenik tunnel crash, 1:10 min
The accident took place on July 28, 2006.
Miljenko Striak (age 26, the one who caused the accident) said that he was sending a text message when he was entering the Ledenik Tunnel. He also said that the sunlight was blinding him and he couldn't see the traffic signs.
Additionally, he violated the speed limit (60kph / 35mph) by driving at 100kph / 60mph. And? he didn't even touch the brake pedal when he was approaching the traffic jam. In September 2008, he was sentenced to 8.5 years in prison.

The Telegraph

Minsk metro blast leaves several dead

A blast tore through a metro station near Belarus President Alexander Lukashenko's main office in the capital Minsk on Monday, killing at least five and wounding several commuters, according to reports.

People help a commuter injured in the blast Photo: REUTERS

5:25PM BST 11 Apr 2011

It was not immediately clear what caused the explosion, which hit the Oktyabrskaya metro station in the city centre.

The exit to the metro leads directly to both Mr Lukashenko's main working office and his residence. Ambulances and fire engines were seen racing to the scene.

Witnesses told AFP that dark plumes of smoke rose from the station tunnel, with dozens of people walking out in a daze, covered in pieces plaster and their clothing tattered.

At least one person had both legs maimed by the blast, a witness said.

Belarus (http://www.telegraph.co.uk/news/worldnews/europe/belarus/) ' state news agency Belta said several people had been killed in the blast, without giving further details.

Belarus strongman brutally suppresses post-election uprising (http://www.telegraph.co.uk/news/worldnews/europe/belarus/8214670/Belarus-strongman-brutally-suppresses-post-election-uprising.html)

Lukashenko: "Europe's last dictator" (http://www.telegraph.co.uk/news/worldnews/europe/belarus/8214397/Alexander-Lukashenko-Europes-last-dictator.html)

The Interfax news agency separately said that at least 30 people were carried out on stretchers from the station.

The RIA Novosti news agency reported that at least 10 people were hurt in the blast, adding that the ceiling of the underground station may be in danger of collapse.

The explosion comes amid growing political tensions inside Belarus linked to the trials of opposition members who rallied against Mr Lukashenko's controversial re-election on December 19.

Tens of thousands of people demonstrated through central Minsk on election night after Mr Lukashenko's overwhelming victory was announced, with police wielding truncheons moving in against the protesters and arresting hundreds.

Several presidential candidates remain in KGB jails, facing prison terms of up to 15 years for organising riots and mass disorders.

Dozens of other opposition leaders face shorter jail terms in trials that began this year.

The arrests have added to the Lukashenko regime's growing international isolation, with both the European Union and the United States announcing travel bans and economic sanctions against some Belarussian state companies.

However despite the political unrest, Belarus is normally considered a safe country and has never been touched by large-scale militant attacks such as those carried out by Islamist militants in Moscow.

On March 29, 2010, 40 people were killed and dozens wounded by two female suicide bombers during the morning rush hour on the Moscow metro.

In January this year, 37 people were killed in a suicide blast at Moscow's Domodedovo airport.

The man who claimed those attacks, Russia's most wanted Islamist rebel Doku Umarov, whom the Russian authorities hoped to have killed in an air strike last month, is alive and preparing reprisals, according to an audiotape.

A man purporting to be Umarov telephoned the North Caucasus service of Radio Free Europe, saying that he was "absolutely healthy" in a message in the Chechen language, the radio said on its website last week.

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LARGE TRANSPORTATION PROJECTS ARE PLAGUED WITH PROBLEMS

Due to difficulty in acquiring funding for transportation projects, state and local governments have had to get creative in order to get their projects completed. Many have turned to the Public Private Partnership (PPP) in order to do this. However, these toll road experiments have not achieved the high profits as promised. Far too often, the result is bankruptcy for the private company and the financial burden is pushed back to the taxpayers.

In addition, due to the multi-jurisdictional nature of large projects and poor coordination between the parties, many are plagued with cost overruns, shoddy workmanship, and widespread corruption.

Therefore, the No 710 Action Committee **expects** that Caltrans and Metro **must**:

Do a full Cost Benefit Analysis of the SR-710 North Gap Closure tunnel project immediately during the initial EIR/EIS stage. If the PPP option is chosen, all contractual and financial considerations must be outlined in detail. Required figures to include the estimated daily toll ranges based on the number of expected vehicles during peak and non-peak hours and how adjustments will be made if usage is lower or higher than expected. Include a specific financial backup plan indicating the source of money to be used, other than public funds, if the PPP should fail. DO NOT allow 99-year agreements and/or “non-compete” clauses.

Conduct a thorough examination of current traffic patterns on the I-710 from the I-405 connector to its terminus at Valley Blvd and both the I-210 from the SR-118 connector and the I-210 from the SR-57 connector to the terminus at California Blvd and the SR-134. Calculate accurate projections of the number of vehicles and trucks that will choose to use the tunnel and those that will choose to use an alternate route to avoid paying tolls. State the freeways and local streets that will likely be used as alternative routes in all nearby jurisdictions and the expected impact on them. List the actions that will be taken to mitigate the damage due to increased traffic.

Conduct thorough investigations of all companies who submit Request For Proposal documents and eliminate any and all that have a history of fraudulent behavior, criminal misconduct, irresponsible business practices, or work that results in injury or death

See Appendix D – Construction Problems

Appendix D
Construction Problems

Support Documents for Declarative Statements

Taxpayers Fund "Private" Cargo Industry

http://www.boston.com/news/traffic/bigdig/articles/2008/07/17/big_digs_red_ink_engulfs_state/
By Sean P. Murphy, Globe Staff / July 17, 2008
Big Dig's red ink engulfs state
Contrary to the belief that the project was heavily subsidized by the federal government, 73 percent of costs were paid by Mass. drivers and taxpayers. (Boston Globe, 7/17/08)

http://www.dot.ca.gov/hq/tpp/offices/ogm/products_files/GGDP_Final_Report.pdf
Global Gateways Development Program State of California Business, Transportation & Housing Agency California Department of Transportation Division of Transportation Planning Office of Goods Movement January 2002 As requested by Resolution Chapter 158, Statutes of 2000 (SCR 96, Karnette)
PDF pg 6 (doc pg 2) Goods Movement Challenge
The State, RTPAs and other local agencies should take an aggressive role in planning, funding, developing, operating and maintaining critical public portions of the goods movement transportation system. In the proposed 2002 STIP, the Governor has nominated 23 projects totaling over $225 million to improve goods movement in the State. RTPAs and other local agencies should also financially support needed freight projects with regional and local funds.

http://www.sfmx.org/support/mts/webdocs/Needs%20Report.pdf
California Marine Transportation System Infrastructure Needs
March 11, 2003 Prepared By: California Marine and Intermodal Transportation System Advisory Council, Northern California Marine Transportation System Advisory Council, Southern California Marine, Transportation System Advisory Council
Lobbying effort on behalf of the ports to get Federal Government country to invest tax dollars towards improving their (710) freeway cargo route.
PDF pg 22 (doc Pg14) - National Assets, National Recognition - 4th paragraph= "For 150 years, projects that promote or enhance rail freight have routinely been ruled ineligible to receive federal funds, primarily because federal policies that date back to the land grant programs DO NOT acknowledge that private rail carriers serve the public good. "
The Port's "Advisory" councils wrote this White paper - it states that the ports rely on the 710 as a cargo route. Essentially, in this document they stress the need to lobby the Federal Government (on the ports behalf) to convince the Govt. that it is in the best interest of the country to invest tax dollars towards improving their (710) freeway cargo route(s) (they include other freeways and train cargo routes in their discussion). They promote viewing/equating their private money making venture (shipping) as a "common good" issue (jobs/economy).
They push for the freeway route "improvements" because the train route is harder to achieve. Apparently there is a rule that keeps the Govt. from subsidizing freight rails (!) Apparently there is no such rule that keeps the Govt. from subsidizing a freeway built for Cargo! This "white paper" is corporate "spin" so the taxpayer's money and freeway systems can be used to help their shipping businesses.

http://www.mxsocal.org/Authors/13/Manny-Aschemeyer.aspx
California MTS Infrastructure Needs Report
by Manny Aschemeyer, Published 08/09/2005, Marine exchange of Southern California
In 2003, Congress will establish successor legislation to the Transportation Equity Act for the 21st Century (TEA-21). More than a simple reauthorization of existing funding programs, the new legislation (herein referred to as "TEA-3") is intended to be the federal government's definitive statement of national transportation policies, programs and projects that address the transportation needs of the United States… investments in transportation infrastructure that enhance freight movement have taken a back seat to commuter-oriented alternatives. An old adage in the freight industry notes that goods movement suffers from lack of attention because "Cargo doesn't vote". … This year, advocates of goods movement are organizing to become actively engaged in the discussions about TEA-3… California State Senator Betty Karnette is working to establish the California Freight Advisory Commission (CALFAC), a group of ports,

shippers, transportation providers, and other interest groups as well as state agencies dedicated to improving freight transportation in the state… In January 2002, the California Business, Transportation and Housing Agency, and the California Department of Transportation (Caltrans) published the Global Gateways Development Program (GGDP), a reflection of stakeholder perspectives on the urgency and options to facilitate the movement of goods in California. (See Appendix 3.) Many of the recommendations outlined in the GGDP provide a foundation for MTS improvement efforts in California. Building upon the GGDP, the MTS program focuses on the ports and supporting inland transport systems in California. This white paper, entitled California Marine Transportation System Infrastructure Needs, is a collaborative effort of the Northern California Marine Transportation System Advisory Council (NORCAL-MTSAC), the Southern California Marine Transportation System Advisory Council (SOCAL-MTSAC), and the California Marine and Intermodal Transportation System Advisory Council (CALMITSAC). This report presents recommended policies, programs and projects for reinvesting in needed infrastructure to support the MTS system. Together with the GGDP, this report will serve as a framework for dialogue with state and federal agencies, the state Legislature and Congress, with the objective of establishing project funding for transportation infrastructure and security upon which we all so heavily depend… From a strategic viewpoint, California is ideally situated in the global trading network. It is blessed with a premier location for ports and international gateways to the entire American market.

Cost Under-Estimations

http://en.wikipedia.org/wiki/Channel_Tunnel
Channel Tunnel
From Wikipedia, the free encyclopedia page was last modified on 8 May 2010 at 07:37.
Private funding for such a complex infrastructure project was of unprecedented scale… an 80% cost overrun. The cost overrun was partly due to enhanced safety, security, and environmental demands. Financing costs were 140% higher than forecast…. Delays and cost overruns led to the share price dropping…. Eurotunnel suspended payment on its debt in September 1995 to avoid bankruptcy. In December 1997 the British and French governments extended Eurotunnel's operating concession by 34 years to 2086. Financial restructuring of Eurotunnel occurred in mid-1998, reducing debt and financial charges. Despite the restructuring The Economist reported in 1998 that to break even Eurotunnel would have to increase fares, traffic and market share for sustainability. A cost benefit analysis of the Channel Tunnel indicated that there were few impacts on the wider economy and few developments associated with the project, and that the British economy would have been better off if the tunnel had not been constructed… The overall environmental impact is almost certainly negative…

http://www.metro.net/board/Items/2011/02_February/20110224RBMItem2.pdf
Planning And Programming Committee February 16,2011, Measure R Project Delivery Committee February 17,2011 Public-Private Partnership Program, Arthur T Leahy Chief Executive Officer
Page 7 PDF "estimate" for the SR-710 cargo tunnel of 2.81 billion from the METRO staff 2/11

http://en.wikipedia.org/wiki/Big_Dig
Big Dig, From Wikipedia page as it appeared on 10 May 2010 at 15:18. GMT
Project…estimated… at $2.8 Billion (1982 dollars) … federal and state tax dollars … the total a staggering $22 billion… It will not be paid off until 2038… Bechtel/Parsons Brinckerhoff, the consortium that oversaw the project ….The project has incurred criminal arrests escalating costs, death, leaks, and charges of poor execution and use of substandard materials.

http://www.infrastructurist.com/2009/12/16/the-4-highway-projects-that-would-be-the-biggest-waste-of-money/
The 4 Highway Projects that Would Be the Biggest Waste of Money
by Yonah Freemark, Wednesday December 16th, The Infrastructurist
Some big infrastructure projects, it seems, will simply never be abandoned. One example is Los Angeles County's I-710 extension between Alhambra and Pasadena: In the works since 1947, it's still just a line on the state highway plans map… A study completed in 2006 pegged the cost of the road at $2.3 to $3.6 billion, but that number would likely be higher today… The huge cost is the biggest obstacle — though Caltrans still has a motivation to push forward because it would lose billions of potential federal dollars if it didn't, and it claims it could line up foreign investors to help pay for the road… But other arguments for the project hardly hold up. The Ports have invested billions of dollars in an improved Alameda Corridor to

allow the shipment of goods via rail. If more products were moved via train instead of truck, congestion would decrease significantly.

http://la.streetsblog.org/2010/10/26/former-metro-board-chair-how-much-will-710-tunnel-cost/
Former Metro Board Chair: How Much Will 710 Tunnel Cost?
by Damien Newton on October 26, 2010
given the potentially huge cost of the project, and the wildly different estimates given for the project over the years (see chart below); Najarian is arguing that Metro should have some hard fiscal figures before committing to spending nearly $60 million on an environmental study.

http://sierramadretattler.blogspot.com/2009/07/710-tunnel-is-feeling-california.html
The 710 Tunnel Is Feeling Some California Legislative Love
Posted By The Moderator At 7:00 AM Thursday, JULY 9, 2009, Sierra Madre Tattler
if we were dealing with a real government here, perhaps the cost - which apparently is staggering - would be at least considered. The problem is that tunneling underground is so expensive that one wonders if the action by the Assembly's Transportation Committee was a serious gesture or, even, a maneuver intended to kill the project by making it too expensive to undertake". ."… Knowing that these figures were prepared by SCAG makes me wonder if perhaps the real consequences (noise levels, air pollution, environmental impacts, traffic congestion) won't be far worse….
The California State Legislature looks to be in the process of making the 710 Tunnel a reality. People don't want it, we can't afford it, environmentalists shudder, and some engineers think it will shatter with the first decent earthquake to come along…
if we were dealing with a real government here, perhaps the cost - which apparently is staggering - would be at least considered. Particularly in the face of California's ballooning debt. But we are talking about Sacramento, so any consideration of the rational is probably inappropriate….
The problem is that tunneling underground is so expensive that one wonders if the action by the Assembly's Transportation Committee was a serious gesture or, even, a maneuver intended to kill the project by making it too expensive to undertake."… Knowing that these figures were prepared by SCAG makes me wonder if perhaps the real consequences (noise levels, air pollution, environmental impacts, traffic congestion) won't be far worse…. With CEQA review having been removed from redevelopment considerations in SB 375, and SB 1350 informing us that as far as the 710 Tunnel goes we can just butt out, it is becoming quite obvious that Sacramento has gotten a little tired of the democracy thing getting in the way of business… Bill Weisman also goes on to note that this bill is opposed by the Consulting Engineers and Land Surveyors of California (they think it might be unconstitutional), the cities of La Canada Flintridge, and South Pasadena, and the Planning and Conservation League. The only registered supporter? A paid lobbyist named Nat Read and his 710 Freeway Coalition. In case you are blissfully unaware, Nat is a former cop who became known for writing poetry about the rigors of life in law enforcement.

http://www.lacanadaonline.com/news/tn-gnp-tunnel-20101022,0,2103822.story
Najarian wants to know what tunnel would cost
By Bill Kisliuk, *October 22, 2010, La Canada Valley Sun*
Najarian, who serves on the MTA board of directors, said there is no credible figure for a project with an estimated price tag of $3 billion to $11.8 billion…."The ultimate question is whether we can ever afford that tunnel," he said.

http://en.wikipedia.org/wiki/Channel_Tunnel
Channel Tunnel, Wikipedia, 5/11/10 3:15 PM
Private funding for such a complex infrastructure project was of unprecedented scale. An initial equity of £45 million was raised by CTG/F-M, increased by £206 million private institutional placement, £770 million was raised in a public share offer that included press and television advertisements, a syndicated bank loan and letter of credit arranged £5 billion...Privately financed, the total investment costs at 1985 prices were £2600 million. At the 1994 completion actual costs were, in 1985 prices, £4650 million: an 80% cost overrun… The cost overrun was partly due to enhanced safety, security, and environmental demands… Financing costs were 140% higher than forecast… Tunneling commenced in 1988, and the tunnel began operating in 1994… In 1985 prices, the total construction cost was £4650 million (equivalent to £10501 million today), an 80% cost overrun. At the peak of construction 15,000 people were employed with daily expenditure over £3 million… Ten workers, eight of them British, were killed during construction between 1987 and 1993, most in the first few months of boring.

Economic performance
Shares in Eurotunnel were issued at £3.50 per share on 9 December 1987. By mid-1989 the price had risen to £11.00. Delays and cost overruns led to the share price dropping; during demonstration runs in October 1994 the share price reached an all-time low value. Eurotunnel suspended payment on its debt in September 1995 to avoid bankruptcy… In December 1997 the British and French governments extended Eurotunnel's operating concession by 34 years to 2086. Financial restructuring of Eurotunnel occurred in mid-1998, reducing debt and financial charges. Despite the restructuring The Economist reported in 1998 that to break even Eurotunnel would have to increase fares, traffic and market share for sustainability… A cost benefit analysis of the Channel Tunnel indicated that there were few impacts on the wider economy and few developments associated with the project, and that the British economy would have been better off if the tunnel had not been constructed

Toll Tunnels Not Viable

http://sunroomdesk.com/2011/01/25/najarian-raises-710-tunnel-cost-question-atone-community-forum-in-pasadena/
Posted By: Editor, Tuesday, January 25, 2011
The big problem I have is that there is a 'tipping point' for the tunnel. If it gets to be greater than $3 billion (I've heard inside the MTA), it will fail. The PPP report says if this cost is higher than $5 billion, it will fail. It doesn't make sense as a community to spend the millions of dollars on consultants, on the finance people, on the engineers, on the outreach people, who are eating their way through that money by the tens of millions of dollars as we speak, only to find years down the road that this is too expensive a project and isn't feasible."

http://ops.fhwa.dot.gov/freight/freight_analysis/reg_ind_studies/so_cal_study.htm
Southern California Regional Freight Study - Executive Summary
United States Department of Transportation - Federal Highway Administration, Last modified: May 27, 2010
Funding/Financing - But not all freight projects in Southern California will be able to rely on user fee financing. Initial evaluations of tolling options for truck lanes in Southern California show that they may not produce sufficient revenues to support project financing… In addition, user fees may reduce the competitive position of regional freight facilities as compared to ports and intermodal facilities elsewhere in the U.S.

http://www.scag.ca.gov/goodsmove/pdf/white_paper.pdf
The Southern California Association of Governments (SCAG) Goods Movement Program:
A survey of regional initiatives and a discussion of program objectives
A White Paper produced by the Southern California Association of Governments January 2002appendices
Pg 33 Of PDF (Pg 1 Appendix 1). Framework For Understanding Regional Goods Movement
Pg 41 Of PDF (Pg 9 Appendix 4): Summary Of Outstanding Goods Movement Issues And Research Needs
Pg 53 Of PDF (Pg 21 Appendix 4): Issue 9: The propensity of trucks to use toll roads needs to be documented in preparation for SR-60 and other truck lane implementation.
It is uncertain whether truckers will be willing to pay tolls sufficient to pay for 30% or 40% of the costs of a new truck lane system which would include I-710, SR-60, I-15, eventually I-5, and perhaps others. Ability to generate user fees to fund construction will be crucial to actually implementing these truck lanes.

http://www.ycat.org.au/?page_id=62
Finances Cost-Benefit of the Road Tunnel
Yarra Campaign for Action on Transport
Community campaign against unsustainable road developments in Melbourne's inner northern suburbs and parks. Even Eddington's report showed that cost of the road tunnel exceeded its benefits, even when "wider economic benefits" are included. These wider benefits, like those used to justify the heavily subsidised Melbourne Grand Prix are never defined. Eddington's consultants used very low predictions for the price of oil, and carbon. A realistic assessment of these prices would lead to a reduction in revenue, as is occurring on toll ways around the world, including the newly opened EastLink.

http://www.ycat.org.au/?p=66
A Current Affair's Toll Challenge

On September 15th, 2008 ,
Current Affair tested out toll roads versus main roads to see which is quicker and how much money you'll actually save - one expert saying nearly $1,000 a year.
ACA concluded toll roads were "a scam".

http://www.road-scholar.org/peak-traffic.html
Transportation triage at the end of the age of oil
by Mark Robinowitz, originally published May 10, 2006, From the Wilderness
An engaging discussion of the effects of Peak Oil on automobile traffic, Mark Robinowitz examines the ridiculousness of implementing "superhighway" plans while the nation faces an inevitable oil drop-off.

http://www3.wsws.org/articles/2005/oct2005/tunn-o21.shtml
The Road to Hypocrisy
November 15th, 2010

http://www3.wsws.org/articles/2005/oct2005/tunn-o21.shtml
Australia: Privatised road tunnel creates havoc in Sydney, By Rick Kelly, 21 October 2005
Wholesale privatisation by stealth
Under the guise of making Australia more internationally competitive, governments at both the federal and state levels have worked to introduce so-called free market and user-pays models throughout virtually every aspect of society…. Independent research conducted by Sydney University's Dr. John Goldberg has demonstrated that without the ongoing support of massive levels of government funding, the toll road companies would be unviable.
So-called Public Private Partnerships (also variously known as Private Finance Initiatives or Privately Financed Projects) have spearheaded the privatisation drive over the past decade. First developed in Britain by the Tory government in the early 1990s, and then further promoted by Labour's Tony Blair as part of his right-wing "third way" program, Public Private Partnerships (PPPs) have been particularly utilised throughout Australia to sell off and contract out those sectors for which there is the most deep rooted hostility towards privatisation. In NSW, PPPs have been used to introduce the profit principle into areas such as school and hospital development, construction of public housing, prison upgrades, and waste disposal and recycling. Across Australia, the PPP market is expected to soon be worth $20 billion to private companies. None of the arguments used by governments and supporters of PPPs hold water. Proponents variously claim that private contractors are more efficient, deliver higher quality service, and help governments avoid going into debt to fund expensive new infrastructure developments. The latter claim is especially bogus with regard to the operation of privately run roads and tunnels in Australia. Independent research conducted by Sydney University's Dr. John Goldberg has demonstrated that without the ongoing support of massive levels of government funding, the toll road companies would be unviable… Through an obscure and highly complex scheme known as the infrastructure offset borrowings tax offset scheme (IBTOS), the federal government effectively underwrites private loans to road infrastructure companies through tax concessions worth billions of dollars to the lenders. This ensures that the infrastructure companies have a guaranteed flow of government-backed money through their books—which is then paid to the companies' shareholders in the form of dividends, ensuring that these companies maintain their high rating on the stock market… The flow of money through private investors, the federal government, and the infrastructure companies increasingly resembles that of a pyramid scheme. As ABC Radio explained: "Toll roads cost a lot to build and generally don't make a profit for many years. So to make their stock attractive to investors, toll road companies borrow against future earnings, and pay that yet to be earned money out to shareholders in dividends today, often refinancing and upping the debt again and again. Of course those debts eventually have to be repaid. So to keep investors fed with dividends, toll road companies have to buy new assets and start the process all over again."

http://www.pe.com/localnews/stories/PE_News_Local_D_tunnel12.1def12e.html
Cost could shelve Corona-Irvine tunnel
By DUG BEGLEY, 10:10 PM PDT on Sunday, July 11, 2010 , The Press-Enterprise
A commuter tunnel below the Cleveland National Forest between Corona and Irvine might never see the light of day, officials and transportation planners say. At a cost of $8.6 billion, it's simply too expensive, they said, especially since officials can't start collecting tolls until after they spend 10 years building it. Critics also have chided the tunnel's ever-rising price. Cost estimates have climbed from $3 billion in 2003, to $6 billion five years ago, to $8.6 billion earlier this year. On average, the toll to use the tunnel would be $14, according to a financial analysis of the project… To pay for the construction, the counties

and their private partner would need to borrow $17.9 billion to guarantee payment of the debt, then wait 10 years for the tunnel to be built. But it appears that also is too costly to make good business sense, according a recent report prepared for the two-county commission. To pay for the construction, the counties and their private partner would need to borrow $17.9 billion to guarantee payment of the debt, then wait 10 years for the tunnel to be built before they made a dime collecting tolls when commuters could finally use the tunnel. Rather than spend $100,000 on a more detailed analysis of how much money tolls could raise and continue field studies in the forest, staff at both county transportation agencies recommend shelving the project.

http://corridornews.blogspot.com/2006_01_22_archive.html
Fork in road on toll plans? By TONY HARTZEL, January 24, 2006, The Dallas Morning News
Some discuss pullout if agency uses local funds for FW highway
Toll shortfall -The tollway authority's most recent estimates show that the approved policy would collect only enough tolls to initially pay about 45 percent of Southwest Parkway's construction, operating and debt costs. Although the policy calls for higher tolls on Southwest Parkway than on most other roads, the Fort Worth toll road is not expected to raise enough money to pay its costs, even after 30 years.

http://en.wikipedia.org/wiki/Channel_Tunnel
Channel Tunnel
From Wikipedia, the free encyclopedia page was last modified on 8 May 2010 at 07:37.
It has been postulated that the British economy would have actually been better off without the costs from the construction project, both Eurotunnel and Eurostar, companies heavily involved in the Channel Tunnel's construction and operation, have had to resort to large amounts of government aid to deal with debts amounted. Eurotunnel has been described as being in a serious situation.

Failed Toll Roads and Tunnels (PPP's)
Socializing the Losses

http://cdn.publicinterestnetwork.org/assets/H5Ql0NcoPVeVJwymwlURRw/Private-Roads-Public-Costs.pdf
Private Roads, Public Costs, U.S. PIRG Education Fund
Written by: Phineas Baxandall, Ph.D. U.S. PIRG Education Fund Kari Wohlschlegel and Tony Dutzik, Frontier Group Spring 2009
The Facts About Toll Road Privatization and How to Protect the Public
A listing of toll roads and how many of them failed and their troubles.

http://corridornews.blogspot.com/2006_01_22_archive.html
Pitfalls abound on private roads BY SYLVIA SMITH, January 24, 2006, Ft. Wayne Journal Gazette
Recent projects that faltered include:
Camino Colombia highway, a 22-mile stretch from Texas to Mexico's border that went bankrupt after three years. Projections that heavy truck traffic would pay $16 per toll never materialized. The state bought the private toll road in 2004 for $20 million, a fraction of its $90 million cost, and Texas got a new road for 22 cents on the dollar, according to Texas officials.

http://www.theage.com.au/business/drivers-desert-eastlink-as-rail-network-overflows-20080807-3rsn.html
Drivers desert EastLink as rail network overflows
Mathew Murphy and Jason Dowling, August 8, 2008
THE future of private toll roads in Australia has been called into question after traffic on EastLink slumped dramatically in the first week of tolling…On the same day that EastLink's lacklustre traffic figures were released, a new report detailed massive overcrowding on Melbourne trains, with some carrying more than 1000 passengers - way over their official capacity of just under 800…The trends were seized on by a prominent tollway critic, who declared more people were choosing to use public transport…- Investors yesterday dumped shares in the tollway owner, ConnectEast…

http://en.wikipedia.org/wiki/EastLink_(Melbourne)
EastLink (Melbourne)
From Wikipedia, the free encyclopedia page as it appeared on Apr 9, 2011 04:10:21 GMT

In its first six months of operation, Eastlink made a loss of almost $93 million. In 2010 the road had to be refinanced with its traffic forecasts rewritten due to lower than expected traffic volumes.

http://www.youtube.com/watch?v=yDyE6o8iKhM
This video from YouTube – it is a glimpse into "future" for the neighborhoods that border the planned 710 toll-tunnel. This video is just one of many reports about the killing effects of cargo transport pollution in Melbourne and Sydney Australia (also Brisbane and Victoria). The results of the toll tunnel are:
1. Trucks exit the tollway to avoid the tolls and use residential street as a bypass…
2. The pollution emitted from an "emission stack" from a 4 Km (2.4 miles) tunnel, which handles 90,000-100,000 cars daily makes the residents sick. "Polluted air is a contributing factor in the deaths of 1,400 people each year in Sydney alone".

http://satollparty.com/post/?p=1466
San Diego privatized toll road goes bankrupt using taxpayer money, San Antonio Toll Party, By David Tanner, associate editor, Monday, April 5th, 2010
The South Bay Expressway foreign-owned toll road is the new poster child for the failed policy of road privatization…government sanctioned monopolies…the flaw in raising toll rates when traffic drops, which is the exact opposite of a free market response to fewer customers….taxpayer subsidized toll roads, often co-mingled with private money) find themselves consistently upside down on their debt despite the taxpayer bailouts that help front the construction costs. We're creating an infrastructure bubble that will be deemed too big to fail that will require even greater taxpayer bailouts if we allow this tax raid to continue. I have yet to see any data that shows increasing the cost of transportation (toll taxes on top of high gas prices) helps the economy either.

http://www.i69tour.org/failedtollrds.html
examples of Failed Toll Roads
Count Us! County Under New Terrian I-69

http://www.corridorwatch.org/ttc/cw-caminocolombia.htm
Will History Repeat Itself? Corridor Watch.org
The Camino Colombia Toll Road failed and the bondholders foreclosed on their $75 million note. On April 29, 2004 the Texas Transportation Commission issued a Minute Order authorizing the Executive Director or his designee to enter into necessary agreements to acquire the Camino Colombia toll road at a cost not to exceed $20 million dollars.

http://www.dailytelegraph.com.au/business/news/tunnel-broke-by-next-year/story-e6frez80-1111116289848
Lane Cove Tunnel set to be second toll road failure
By Simon Benson and Rhys Haynes From:_The Daily Telegraph May 09, 2008 12:00AM
THE Lane Cove Tunnel could be broke by next year in a second spectacular billion-dollar toll road failure for the State Government in 18 months.

http://www.visordown.com/motorcycle-news--general-news/m6-toll-road-branded-an-expensive-failure/13708.html
M6 Toll Road branded "an expensive failure", Posted: 1 September 2010
by Visordown News, motorcycle news : general news
"Toll roads are not, and will never be, a solution to congestion on Britain's roads"…congestion around Birmingham is as bad, if not worse, than when the 27-mile stretch of toll-charge motorway was opened in 2003…Initially, drivers were charged just £2 to use the road; this figure has risen to £5 for cars and £9 for vans, with motorcyclists incurring a hefty £2.70 one-way weekday charge…In a bid to make the M6 flow more freely, proposals had been made to allow cars to use the hard shoulder - a move that would cost a claimed £300 to £500 million to undertake…"Toll roads are not, and will never be, a solution to congestion on Britain's roads, no matter how attractive they may appear to cash-strapped politicians desperate to deliver otherwise unaffordable road schemes," the report concludes.

Investors Back Away from Risky PPP's

http://www.smh.com.au/business/shortterm-thinking-puts-brakes-on-infrastructure-20110304-1bi5y.html
Short-term thinking puts brakes on infrastructure

Matt O'Sullivan and Philip Wen, March 5, 2011, The Sydney Morning Herald
The recent failures mean governments are under greater pressure to meet the huge shortfall in funding as investors run scared from piling equity into so-called ''greenfield'' infrastructure projects. Leighton has made clear its appetite for investing in such projects has been ''very much reduced''… ''The government does need to bear a big chunk of the responsibility for those failures,'' says Andrew Chambers, an infrastructure analyst at Austock. ''After all, it was their tenders which created a model that attracted a lot of hot money.
''If the government was going to tender something like that today, the hot money wouldn't be there and sensible money was never there… the level of debt to equity has to be at more appropriate levels of 40-50 per cent - not the 80-90 per cent gearing that toll-road owners such as RiverCity Motorway and Connector Motorways (failed owner of the Lane Cove Tunnel) were saddled with.

Reasons for Failed Tollways

http://www.washingtontimes.com/news/2010/mar/30/the-trouble-with-tolls/
Editorial: The Trouble With Tolls, By THE WASHINGTON TIMES, Tuesday, March 30, 2010
A toll-road project in San Diego, once held up as a model of the "innovative" public-private partnerships, collapsed last week… The South Bay Expressway filed for Chapter 11 bankruptcy protection…
this article mentions a study TxDOT did that admits toll roads are based on FLAWED traffic projections (that are kept secret until after the contracts are signed)

http://www.tollroadsnews.com/node/2366
Hungarian toll road fails
Posted on Wed, 1999-09-15 12:42, toll roads news
High tolls and exaggerated notions of traffic appear to lie behind the recent failure of the first toll road concession in Hungary…. Cars were charged $6.50 for the trip on the 42km $320m M1 toll road from Gyor to Austria, a rate of 16c/km. Heavy trucks were tolled at a rate of 55c/km.

http://www.theaustralian.com.au/news/nation/clem7-tunnel-losses-endanger-public-private-infrastructure/story-e6frg6nf-1225912550578
Clem7 tunnel losses endanger public-private infrastructure
Annabel Hepworth and Jared Owens From The Australian September 01, 2010 12:00AM
..traffic volumes were still much lower than expected…The tunnel company's woes bring to eight the toll-road PPPs that have caused losses to investors, lenders and taxpayers in the past five years…."It's the kind of engineering madness among those who think that if you build something, people will come. "
Governments face pressure to radically overhaul the way they structure public-private partnerships for critical infrastructure following the shock of Brisbane's first major road tunnel being written down by a massive $1.56 billion.
The operator of the Clem7 tunnel revealed yesterday that traffic volumes were still much lower than expected, despite tolls being slashed by 50 per cent on July 1 in a desperate bid to convince motorists to use the link.
The tunnel company's woes bring to eight the toll-road PPPs that have caused losses to investors, lenders and taxpayers in the past five years. The tunnel projects have lost at least $5.5bn, according to an analysis by The Australian, and there are fears the figure could rise. Australian Super head Ian Silk warned that if the private sector was to shoulder the risk that traffic volumes would fall short, this would "warrant a much higher return than is currently available in many infrastructure investments".
Industry Funds Management chairman Garry Weaven said "somebody is going to lose money" if the private sector "bid too aggressively on the basis of inflated traffic forecasts". "It's the kind of engineering madness among those who think that if you build something, people will come. "

http://www.theage.com.au/articles/2003/04/15/1050172596490.html\
Lies, damned lies and the Bracks tollway
Kenneth Davidson April 16 2003
If a toll is put on the road, the traffic will be even less than shown in the EES, and the tolls would have to be astronomical to make it a paying proposition
But will a private toll or PPP road be attractive to private investors without massive subsidies from the taxpayer? A study commissioned by Peter Batchelor from the Department of Infrastructure in 1999 concluded motorists would have to pay $8 per trip for the road to be economically viable. How many cars

are likely to use the proposed freeway? According to the environmental effects statement on the proposed freeway, providing it was toll free, there would be only 100,000 trips a day on parts of the freeway and virtually no trips covering the full distance between Frankston and Ringwood.
According to the panel report, "the EES has based all traffic modelling and evaluation on the assumption that a Scoresby freeway will be a 'free road' and will not be subject to tolls. The panel considers if consideration is given to making the freeway subject to tolls . . . the conclusions drawn in the modelling and economic evaluation sections in this report to be void and this and any other analysis undertaken in the EES would need to be repeated." If a toll is put on the road, the traffic will be even less than shown in the EES, and the tolls would have to be astronomical to make it a paying proposition. How to overcome this? There are three options. 1. Close off alternative routes such as Stud and Springvale Roads to through traffic, to force traffic on to the toll road. But as there isn't much through traffic in the first place, this won't help much. A cheaper way to relieve pressure on Stud and Springvale Roads would be to introduce a decent bus service, to get some cars off the roads. 2. Build the road as a public-private partnership in which the private partners put up all the initial capital in return for revenue guarantees down the track in the form of "shadow tolls", toll subsidies, or a subsidy like that given to the public transport franchisees. 3. Do what has been intended all along, irrespective of how the Scoresby freeway is to be financed: namely, extend the tollway to include the VicRoads long-term plan to complete the ring road by joining up the Mitcham end of the Scoresby freeway to the eastern end of the Metropolitan Ring Road. A private toll road along the Scoresby corridor doesn't even begin to make commercial sense unless it forms part of a larger ring road. But even then it doesn't make economic or environmental sense, when the cheaper and environmentally superior alternatives are taken into account.

http://corridornews.blogspot.com/2006_01_22_archive.html
Privately built roads often fail to keep promises
By Sylvia A. Smith, Jan. 23, 2006, Washington editor FortWayne.com
But in the first 10 years of its 40-year franchise, the Greenway never turned a profit, in part because traffic was much lower than projected. The toll road defaulted on its loans in 1996, refinanced, and last year sold a majority interest in it for $533 million to an Australian investment firm that was part of the conglomerate that leased the Chicago Skyway….Elsewhere, overly rosy projections for how much traffic private toll roads would attract have limited their financial success. For instance, toll roads in Virginia and South Carolina have not lived up to their expected usage, so the income from tolls is below projections.

http://www.thomaswhite.com/explore-the-world/BRIC-spotlight/2010/china-toll-roads-expressways.aspx
Toll Roads in China: Speeding Up Growth
Thomas White International August 2010
Risks involved in road projects - *Operation risks:* These are the significant risks that arise once the road is operational and the tolls are collected in the form of incorrectly estimated traffic demand, toll levels and the toll collection technology.

http://www.signonsandiego.com/news/2010/mar/23/south-bay-expressway-builders-file-chapter-11/
Toll road operator files for Chapter 11
By Steve Schmidt Originally Published March 23, 2010 At 12:24 A.M., Updated March 24, 2010 At 12:05 A.M.
South Bay Expressway use below forecasts
the company is falling about $16 million short each year in what it owes its direct lenders, according to court filings. When the deal was crafted in 1991, it was lauded as a novel way to finance public roads."The idea was to see if the private sector could succeed in building highways,"… Motorists pay $2.50 to $4.50 per trip, depending on length…. But once the higher tolls kicked in, they stopped completely.

http://opinion.latimes.com/opinionla/2008/10/road-toll-footh.html?cid=135353695
For whom the road tolls, Observations And Provocations
From The Times' Opinion Staff October 17, 2008, 2:21 pm
Opinion L.A.The Transportation Corridor Agencies-- that would be the same group trying to build a toll road to nowhere through a favored state park -- is asking the government for a loan of more than $1 billion. But what the federal government really needs to take into account is the reason for the request: The existing toll roads aren't doing well. Contrary to what toll-road officials love to predict, higher gas prices do not make commuters switch to (less crowded) toll roads, where they pay an extra $4 to $5 or so each way.The worst performer by far is the San Joaquin Hills Transportation Corridor, or Route 73, which has never met expectations. Ridership last year was half the predicted level, and the numbers are sliding

downward.

http://bicycleaustin.info/rogerbaker/tollroad-failure.html
The Failure of Toll Roads
By Roger Baker * June 20, 2003, Bicycle Austin.info
The major factors that are going to cause the toll road bonds to default are: 1. Declining regional growth in the suburbs of affluent folks… 2. The scale of the toll road network built with borrowed money… 3. The sudden realization that there is not enough gas has taken the marketplace by surprise,

http://www.chart.state.md.us/video/video.asp?feed=2a012b0800ae0059004d06363d235daa
No free ride: Traffic dips as ICC tolls start
ICC Maryland Transportation Authority tolls
By: Kytja Weir 03/08/11 1:19 Pm
Only about 8,500 vehicles traveled on the first 5.6-mile leg of the new highway that runs from Interstate 370 in Shady Grove to Georgia Avenue in Olney on Monday, according to Maryland Transportation Authority spokeswoman Kelly Melhem… well below the 21,000 car per day total that officials estimated for the leg. Empty Toll way in the State of Maryland – streaming video

99-Year Lease Agreement, Tolls Doubled, Non-Compete Clauses

http://en.wikipedia.org/wiki/Ontario_Highway_407
Ontario Highway 407, From Wikipedia page as it appeared on Apr 9, 2011 08:36:36 GMT
Highway 407 in Toronto, Ontario was leased to a consortium of investors under a 99-year lease in 1999. Bad contracts: "About Highway 407 in Canada" "99-year lease agreement, unlimited control of the highway and its tolls, as well as a clause protecting the corporation from any competition, not the least of which includes a ban on construction of any nearby provincial highways that may reduce toll revenue."

http://corridornews.blogspot.com/2006_01_22_archive.html
When good toll-road ideas turn bad
By GORDON DICKSON, January 23, 2006, Fort Worth Star-Telegram
407 ETR, Toronto -- Residents and government officials have gone to court to try to stop Madrid-based operator Cintra and its partners from raising toll rates

http://corridornews.blogspot.com/2006_01_22_archive.html
Frisco drivers may face $700 toll rise
By STEVE STOLER / WFAA-TV, Thursday, January 26, 2006 Dallas/Fort Worth

http://corridornews.blogspot.com/2006_01_22_archive.html
Privately built roads often fail to keep promises
By Sylvia A. Smith, Jan. 23, 2006, Washington editor FortWayne.com
Within a few years of the toll lanes' opening, the non-compete clause became a political nightmare because it blocked upgrades to the adjacent public highway. In 2003, the state purchased the toll lanes for $207.5 million in bonds, which it expects to pay off with toll revenue.

http://en.wikipedia.org/wiki/91_Express_Lanes
91 Express Lanes, From Wikipedia page as it appeared on 13 September 2010 at 07:10 GMT
The deal included an 99-year lease agreement, unlimited control of the highway and its tolls. The government also may not build any nearby freeway which might potentially compete with 407.
The toll on the busiest hour on the tollway, 4:00 pm to 5:00 pm eastbound on Thursdays, is $9.90, or approximately $1.00 per mile, the highest toll for any toll road in the country…
The express lanes have been controversial because of a "non-compete" agreement that the state made with CPTC. The clause, which was negotiated by Caltrans… to ensure profit for the express lanes. This includes restricting the state from widening the free lanes or building mass transit near the freeway. CPTC filed a lawsuit against Caltrans over freeway widening related to the interchange with the Eastern Transportation Corridor interchange, which was dismissed once the purchase with OCTA was finalized.

http://www.unbossed.com/index.php?itemid=276
Toll Roads, Privatization, and Taxes – Connect the DOTs - Part II
by shirah at 01:43:00 Wednesday, July 20, 2005
The pro-private roads lobby has said that they cannot make a profit on roads unless they are given noncompete agreements… The poster child for noncompete agreements is California SR 91. The private contractor and the state agreed that public highways near SR 91 would not be maintained or improved until the year 2030. In other words, the state was to allow the state highway to crumble for decades, forcing the public onto the private toll road. But California found it could not leave the roads to deteriorate and endanger drivers' lives. When the state fixed the nearby roads, the private owner sued for breach of contract, and the public learned the true cost of the private road. The public was furious and turned against the project and the government that had agreed to it…. California Attorney General Bill Lockyer described the Hwy. 91 as a "polite form of highway robbery."
The problem is that when there is no "noncompete" provision, the private sector is not interested in funding toll roads.
The GAO found that 4 of the 5 tollways examined included noncompete clauses in their contracts "under which the public sector agrees to varying degrees not to build any new roads or improve any of the existing roads that may result in additional capacity within a predetermined distance of the newly constructed road for a certain period of time." Where these did not exist, there were "understandings" the state would not build a competing road… The SR 91 experience has forced privatization proponents to find creative ways to achieve the same end. One is to require the state to compensate the private owner for any revenues lost when improvements are made to nearby roads. California's State Route 125 includes a provision that allows the state to build a competing road but only if the state reimburses the private company for revenues lost to the new road. Calculating those lost revenues is, again, an enterprise filled with uncertainty and opportunities for overreaching…. The private sector takes the position that "eliminating or limiting noncompete provisions is not a solution, because the private sector would be unwilling to invest in highway projects without adequate protection against future competition." Robert Poole said, in January 2005, "Nearly all new toll road projects, in order to sell bonds to investors, must offer some degree of protection from unlimited taxfunded competition from competing free highways."

http://www.unbossed.com/index.php?itemid=274
Part I - Toll Roads, Privatization, and Taxes – Connect the DOTs
by shirah, Tuesday, July 19, 2005
While the Bush DOT favors privatization, the General Accountability Office has carefully examined the history of private highway projects and found serious problems. In *Highways and Transit: Private Sector Sponsorship of and Investment in Major Projects Has Been Limited, GAO-04-419,* March 25, 2004, the GAO found that the "private sector encounters many challenges to becoming more actively involved in highway and transit projects because of limited opportunities and barriers to financial success." In plain English, the problem is that it is hard to make money in private roads . . . if you rely on the "magic" of the market.

http://pwm.sagepub.com/content/5/4/259.abstract
An Odyssey of Privatizing Highways
The Evolving Case of SR 91, Willard T. Price Public Works Management & Policy, April 2001; vol. 5, 4: pp. 259-269. University of the Pacific
California Private Transportation Corporation) soon filed suit against the public partner (the California State Transportation Department, or Caltrans) for violation of the "noncompete clause" of the original agreement… following questions are discussed: Can toll and free lanes compete for traffic or "business"? Is the public interest served by a profit-making private tollway? Would a public or nonprofit agency be a better steward of tollway assets?

http://articles.latimes.com/2002/jul/07/local/me-toll7
Dan Weikel July 07, 2002 Los Angeles Times - Los Angeles, Calif.
Pay-as-you-go highways have become a political nightmare. Orange County transportation authorities hope to buy the lanes, but still operate the tollway…. Political and financial problems have led many state leaders to conclude that California's nearly two-decade experiment with toll roads has failed, despite fervent hopes and vast investments… Largely because of noncompete clauses, members of the Assembly and Senate Transportation Committees say it is unlikely the Legislature will support more toll roads.

http://www.smh.com.au/business/the-toll-roads-that-turn-into-money-pits-20100831-14flh.html

The toll roads that turn into money pits, By Matt O'Sullivan, September 1, 2010
Rosy traffic forecasts have turned into red faces and red ink, writes Matt O'Sullivan…. As it has turned out, fewer than 28,000 vehicles are now using the Clem7 - less than a third of the original predictions - even after RiverCity Motorway, the operator and builder of the tunnel, halved tolls and introduced other incentives in a desperate bid to entice motorists… With those ambitious traffic forecasts now seemingly impossible to meet, the tunnel named after former Brisbane lord mayor Clem Jones is on the verge of following the lead of Sydney's failed Cross City and Lane Cove tunnels… Yesterday RiverCity revealed the extent of its predicament when it posted a $1.67 billion annual loss. So how did traffic forecasters, charging millions for their expert opinions, conclude that thousands more motorists would use the $2.8 billion Clem7 than the Midtown Tunnel? Put simply, the traffic forecasts here were made to fit the financial models… John Goldberg, an honorary associate of the University of Sydney and a leading critic of the toll-road model, says the predictions for the Clem7 and other projects such as BrisConnections' Airport Link are the result of a ''work-back from the financial outcome promised to equity investors''. 'They worked out what the investor was going to be happy with in terms of rates of return, and they worked back to a set of numbers which would produce that return for investors. Such forecasts do not properly relate to the interaction of land use and transport, and it is not surprising that they are not fulfilled. Moreover, the forecasts usually correspond to congested conditions during the peak periods.'' Goldberg has brought his concerns to the attention of investors and politicians for nigh on a decade yet they largely fell on deaf ears - as RiverCity's latest woes show.
In the case of the Clem7, RiverCity's then boss, Peter Hicks, said in 2006 that the company had adopted a more conservative approach to traffic forecasting after the Cross City Tunnel debacle. ''We have always had a very careful approach to traffic forecasting,'' Hicks told *The Australian* at the time. ''If anything, the example in Sydney has led us to put more emphasis on traffic forecasts.''

Fraud Scandals and Corruption

http://www.freerepublic.com/focus/f-news/1189316/posts
Highway tiff threatens Canada-EU trade deal Free Republic
JOHN IBBITSON Posted on August 11, 2004 5:21:24 AM PDT
OTTAWA -- The government of Spain has warned that it will veto a proposed trade agreement between Canada and the unless the Ontario government allows a Spanish company to raise tolls on the province's Highway 407.

http://www.thenewspaper.com/news/09/936.asp
2/3/2006 the News Paper.com
"Australia: Traffic Lights Modified to Funnel Traffic Into Toll Tunnel" Traffic lights in Sydney, Australia were modified to create gridlock forcing frustrated motorists into a controversial toll tunnel.

http://www.youtube.com/watch?v=VeZjMTzqNQ8
Seconds From Disaster - S01E02 - Tunnel Inferno _46:24 minutes
On 24 March 1999, 39 people died when a Belgian transport truck carrying flour and margarine caught fire in the tunnel. After several km, the driver realized something was wrong as cars coming in the opposite direction flashed their headlights at him; a glance in his mirrors showed white smoke coming out from under his cab. This was not yet a fire emergency; there had been 16 other truck fires in the tunnel over the previous 35 years, always extinguished on the spot by the drivers.

http://www.ycat.org.au/?p=156 - more-156
The Road to Hypocrisy, November 15th, 2010
http://www3.wsws.org/articles/2005/oct2005/tunn-o21.shtml
Australia: Privatised road tunnel creates havoc in Sydney, By Rick Kelly, 21 October 2005
The Cross City Tunnel.. under the control of an international syndicate headed by Li Ka-Shing, Asia's wealthiest individual… based on the forecast that 90,000 vehicles would make daily use of the two-kilometre tunnel… Less than 25,000 cars presently use the tunnel each day, with other drivers taking alternative routes to avoid the exorbitant $3.56 minimum toll… the government… has tried to dragoon motorists into the tunnel by shutting down and restricting a number of public roads in the area… the government admitted that the 30-year contract negotiated with the tunnel's owners compelled it to take such measures to ensure an adequate traffic flow on the road. Under the terms of the deal, within a five-kilometre radius of the tunnel, up to 500 roads in a dozen suburbs can be closed or restricted. (The contract euphemistically refers to such measures as "road calming")… The result has been traffic chaos

throughout many parts of eastern Sydney…. The government also promised to compensate the company if any improvements were made to the public transport system which affected the number of vehicles traveling through the tunnel. If the contract is broken—by any government in the next three decades—the company is entitled to an $850 million payout…
The Cross City Tunnel, running under the centre of Sydney, opened last month under the control of an international syndicate headed by Li Ka-Shing, Asia's wealthiest individual. The group won the bid to operate the tunnel and collect the toll revenue for the next 30 years after paying the New South Wales (NSW) government $105 million. This payment was based on the forecast that 90,000 vehicles would make daily use of the two-kilometre tunnel… Less than 25,000 cars presently use the tunnel each day, with other drivers taking alternative routes to avoid the exorbitant $3.56 minimum toll for each trip on the private road… In an extraordinary measure befitting that of a police state, the government of Premier Morris Iemma has tried to dragoon motorists into the tunnel by shutting down and restricting a number of public roads in the area. When this predictably provoked public outrage, the government admitted that the 30-year contract negotiated with the tunnel's owners compelled it to take such measures to ensure an adequate traffic flow on the road. Under the terms of the deal, within a five-kilometre radius of the tunnel, up to 500 roads in a dozen suburbs can be closed or restricted. (The contract euphemistically refers to such measures as "road calming")… The result has been traffic chaos throughout many parts of eastern Sydney…. The government also promised to compensate the company if any improvements were made to the public transport system which affected the number of vehicles travelling through the tunnel. If the contract is broken—by any government in the next three decades—the company is entitled to an $850 million payout…The Cross City Tunnel scandal largely overshadowed an announcement by the NSW government that it has agreed to pay more than $100 million to the receivers of the private company that formerly operated the Sydney airport rail link. The company collapsed five years ago after lower than expected usage of the route.

http://www.boston.com/news/traffic/bigdig/articles/2008/06/24/accused_big_dig_firm_files_for_ch_11/
Accused Big Dig firm files for Ch. 11
By Sean P. Murphy and Jonathan Saltzman, Globe Staff / June 24, 2008
Modern Continental Corp., which earned $3.2 billion as the largest contractor on the Big Dig and was charged criminally with hiding shoddy workmanship, sought the shelter of US Bankruptcy Court, claiming up to $1 billion in debts. (Boston Globe, 6/24/08)

http://www.boston.com/news/traffic/bigdig/articles/2008/06/20/firms_ex_managers_agree_to_plead_guilty_in_big_dig_scandal/
By John M. Guilfoil, Globe Correspondent / June 20, 2008
Firm's ex-managers agree to plead guilty in Big Dig scandal
Two defendants agreed to plead guilty to highway project fraud in scheming the state out of more than $300,000 for work done on the Interstate 93 tunnel. (Boston Globe, 6/20/08)

http://www.boston.com/news/traffic/bigdig/articles/2008/05/21/contractor_pleads_guilty_in_big_dig_overbilling_case/
By Jef Feeley and Beverly Ford, Bloomberg News / May 21, 2008
Contractor pleads guilty in Big Dig overbilling case
A major contractor for the $15 billion Big Dig project has pleaded guilty to defrauding the US government. (Boston Globe, 5/21/08)

http://www.boston.com/news/traffic/bigdig/articles/2008/04/05/big_dig_officials_firing_led_to_windfall/
Big Dig official's firing led to windfall
By Sean P. Murphy, Globe Staff / April 5, 2008
Michael P. Lewis didn't retire from his post as the head of the Big Dig, but was actually fired last year. The move allowed him to more than triple his state pension. (Boston Globe, 4/5/08)

http://www.boston.com/news/traffic/bigdig/articles/2008/03/01/big_dig_firm_manager_charged_with_conspiracy/
Big Dig firm, manager charged with conspiracy
By Jonathan Saltzman, Globe Staff / March 1, 2008
Federal prosecutors charged a major Big Dig contractor and one of its managers with scheming to overcharge the government more than $300,000 for work done on the Interstate 93 tunnel. (Boston Globe, 3/1/08)

http://www.boston.com/news/local/breaking_news/2008/01/458m_big_dig_se.html
$458m Big Dig settlement reached
By Globe Staff, January 23, 2008 02:47 PM
State and federal authorities announced a settlement of $458.2 million with the firms that designed and managed the Big Dig. (Boston Globe, 1/23/08)

http://www.boston.com/news/traffic/bigdig/articles/2008/01/17/settlement_reportedly_near_in_i_90_tunnel_ceiling_collapse/
Settlement reportedly near in I-90 tunnel ceiling collapse
By Andrea Estes, Globe Staff / January 17, 2008
The attorney general's office is close to reaching a settlement with Bechtel/Parsons Brinckerhoff in exchange for not seeking criminal charges. (Boston Globe, 1/17/08)

http://www.boston.com/news/local/massachusetts/articles/2007/11/26/cost_of_probe_on_big_dig_nearly_1m/
By Andrea Estes
Globe Staff / November 26, 2007
Cost of probe on Big Dig nearly $1m
The special prosecutor spearheading the investigation into the Big Dig tunnel ceiling collapse is billing the state almost $30,000 a week. (Boston Globe, 11/27/07)

http://www.boston.com/news/traffic/bigdig/articles/2007/07/14/big_dig_deal_could_hit_1b/
Big Dig deal could hit $1b
By Andrea Estes and Sean P. Murphy, Globe Staff / July 14, 2007
State and federal officials are demanding that Bechtel/Parsons Brinckerhoff pay as much as $1 billion to settle claims for shoddy work on the Big Dig, in exchange for a guarantee that the consortium will not face criminal charges in last year's tunnel collapse. (Boston Globe, 7/14/07)

http://www.boston.com/news/local/massachusetts/articles/2007/07/11/wide_risk_wide_blame/
Wide risk, wide blame
By Sean P. Murphy and Andrea Estes, Globe Staff / July 11, 2007
Federal investigators blamed multiple Big Dig contractors and the Massachusetts Turnpike Authority yesterday for last summer's fatal tunnel collapse, concluding that the wrong kind of glue was used to hold up part of the concrete ceiling and that project oversight was inadequate to detect the problem. (Boston Globe, 7/11/07)

http://www.boston.com/news/traffic/bigdig/articles/2006/08/20/big_dig_officials_chose_not_to_retest/
Big Dig officials chose not to retest
By Scott Allen and Sean P. Murphy
Globe Staff / August 20, 2006
Several ceiling bolts came loose in the Interstate 90 connector tunnel while it was under construction in 1999, even after they passed a safety inspection. But project documents show that officials overseeing the Big Dig chose not to retest most of the bolts. (Boston Globe, 8/20/06)

http://www.boston.com/news/traffic/bigdig/articles/2006/07/24/probes_may_test_bechtels_clout/
Big Dig's design firm deflects blame
By Christopher Rowland, Globe Staff / July 24, 2006
Bechtel Corp., one of the world's largest construction and engineering firms, has few equals when it comes to wielding political power and fending off enemies. (Boston Globe, 7/24/06)

Parsons Brinckerhoff

http://www.publicpurpose.com/ut-pblie.htm
Taken for a Ride: Parsons Brinckerhoff Expose
By Tara Servatius, *The Public Purpose: One of National Journal's Top 4 Transport Internet Sites* (c) 2002 www.publicpurpose.com --- Wendell Cox Consultancy

http://www.nashtu.us/download/HR 2104 - Disaster Examples.pdf

HR 2104 "Safety, Efficiency and Accountability in Transportation Projects through Public Inspection Act" (Filner) - Disaster Examples- Boston's Big Dig – Deadly Failures

http://en.wikipedia.org/wiki/Big_Dig
Big Dig From Wikipedia
The project has incurred criminal arrests escalating costs, death, leaks, and charges of poor execution and use of substandard materials. Former Massachusetts Attorney General Thomas Reilly demanded that contractors refund taxpayers $108 million for "shoddy work". … Bechtel/Parsons Brinckerhoff, the consortium that oversaw the project, would pay $407 million in restitution for its poor oversight of subcontractors (some of whom committed outright fraud), as well as primary responsibility in the death of a motorist. However, despite admitting to poor oversight and negligence as part of the settlement, the firm is not barred from bidding for future government contracts. Several smaller companies agreed to pay a combined sum of approximately $51 million.

http://www.thestar.com/Business/article/296783
Contractors to settle Boston Big Dig suit for $450M
Denise Lavoie, Published On Wed Jan 23 2008,THE ASSOCIATED PRESS
"The citizens of Massachusetts entrusted Bechtel/Parsons Brinckerhoff to act as their eyes and ears on the Central Artery Project," Sullivan said. "They grossly failed to meet their obligations and responsibilities to the citizens of Massachusetts and the United States".. Under the settlement, Bechtel/Parsons Brinckerhoff will not face criminal charges in the deadly Interstate 90 tunnel ceiling collapse in July 2006. Milena Del Valle, 39, of Boston, was crushed by about 23 tonnes of concrete as she and her husband drove to Logan International Airport.The deal also does not bar the consortium from receiving future government contracts. Bechtel/Parsons Brinckerhoff was paid more than $2 billion to manage the project. State officials will be able to seek additional damages from Bechtel/Parsons Brinckerhoff only if there is a catastrophic event, defined as causing more than $50 million in damages. Its liability will be capped at $100 million.

Toll Roads Increase Commute Times

http://www.boston.com/news/traffic/bigdig/articles/2006/07/18/headaches_return_in_north_end_s_boston/
Residents, businesses feel effects of Big Dig reroutes
Headaches return in North End, S. Boston
By Donovan Slack and Emma G. Fitzsimmons
Globe Staff and Globe Correspondent / July 18, 2006

http://www.boston.com/news/local/articles/2008/11/16/big_dig_pushes_bottlenecks_outward/
Big Dig pushes bottlenecks outward
By Sean P. Murphy, Globe Staff / November 16, 2008
Longer on several major routes
"A Globe analysis of state highway data documents what many motorists have come to realize since the new Central Artery tunnels were completed: … the bottlenecks were only pushed outward, as more drivers jockey for the limited space on the major commuting routes…Ultimately, many motorists going to and from the suburbs at peak rush hours are spending more time stuck in traffic, not less. The phenomenon is a result of a surge in drivers crowding onto highways – an ironic byproduct of the Big Dig's success in clearing away downtown traffic jams."

Spokker -*"Never mind how much the Big Dig cost. The biggest problem with it is that it didn't even work".*
It diverted traffic elsewhere.

THE SR-710 NORTH GAP CLOSURE
USE OF THIS DESCRIPTION

Caltrans & Metro continue to use the term “SR-710 North Gap Closure” when referring to this project. This can only indicate to the people of Los Angeles and surrounding communities, that a specific project has been chosen and the specific route that it will take. This term further illustrates the unwillingness to seriously consider alternative solutions for improving traffic problems in the region.

Therefore, the No 710 Action Committee **stipulates** that Caltrans & Metro **must**:

Give equal weight to all alternatives and study them thoroughly. This includes **ALL** alternatives to improve traffic congestion, not just options to “close the gap.” Conduct Cost Benefit Analyses, Health Impact Assessments, and Traffic Pattern studies on each alternative.

Study all alternatives with the same robust enthusiasm as the Tunnel Alternative.

Utilize an unbiased, independent research team of professionals to do required studies, who will use scientific methodology and statistical analysis to obtain results. Do not work backward from the desired outcome.

Eliminate the surface freeway as a viable option in the earliest possible phase of scoping to reduce waste of taxpayer monies

Release the 500 houses that have been held captive by Caltrans for five decades. Vow not to claim any additional properties in El Sereno, Alhambra, South Pasadena, and Pasadena.

Ultimately choose the most fiscally and environmentally responsible alternative to solve our regional transportation problems in Los Angeles County

ALTERNATIVE SOLUTIONS

No new freeways shall be built to accommodate freight traffic. Zero emission alternative options must be used to move cargo containers at the Ports and to their destinations. Examples of this:

_ Repurpose the lower 710 freeway and reconfigure the center section to accommodate electric freight and transit train lines that run down the middle

_ Utilize short haul electric trains with an intermodal logistics complex or distribution port to remove freight trucks from the inner cities’ freeways

_ Electrified train transportation of freight with dockside loading like in the Grid System envisioned by SkyStorage systems onto railcars or CargoWay trams as envisioned by

MegaRail Corporation that load directly at the ports and are transported directly to an intermodal destination for redistribution

Smaller, less invasive transportation projects must be considered first to alleviate regional traffic problems. This plan will provide more local jobs at a fraction of the cost with much shorter timelines. Examples of these:

_ Complete the Multi-mode, Low Build projects as defined by the City of South Pasadena and other cities

_ Consider other multi-modal and intermodal projects to move people and goods including but not limited to signal synchronization, grade separation at rail crossings, upgrades and reconfigurations to surface roads and freeway ramps, increased or expanded bus and rail service, add bike paths and bike lanes, and promote walk-ability through complete street enhancements

See Appendix E – Alternative Solutions

MULTI-MODE LOW BUILD ALTERNATIVE

Residents within the cities of South Pasadena, Pasadena, Alhambra, and El Sereno in Los Angeles claim the Multi-Mode Low Build Alternative is a better strategy to move people and goods in the L.A. Basin than the proposed 710 Freeway North Extension. This preferred plan will create locals jobs, keep neighborhoods intact, and cost considerably less..

What is the Multi-Mode Low Build Alternative?
It is a system of transportation improvements that upgrades city surface streets, enhances existing freeways, and encourages coordinated linkage between different travel modes: automobiles, light railway, buses, shuttles, and bicycles. It is designed to improve mobility within South Pasadena, Pasadena, Alhambra, and El Sereno by targeting the areas that are of the most concern..

Projects within the Corridor

- Extend 710 freeway to Mission Road (Connector Road), reducing East-West (E-W) traffic on Valley Boulevard and Fremont Avenue congestion. Design would be such that it would provide additional E-W diffusion, but not additional North-South (N-S) diffusion through neighborhoods.
- Add a 710 off-ramp at Cal State L.A.; add a right-hook on ramp to the 110 freeway in South Pasadena at Fair Oaks Avenue and State Street; widen Fair Oaks off-ramp.
- Build bridges over depressed rail road tracks in Alhambra, reconnecting N-S streets to relieve congestion on Fremont Avenue.
- Upgrade Figueroa Street to create a parallel corridor to the 110 between downtown L.A. and Pasadena.
- Create on-ramp to the 110 freeway at Glenarm Street and Raymond Avenue in Pasadena. (*Completed)*
- Synchronize traffic signals on Arroyo Drive, Fair Oaks Avenue, and Fremont Avenue for smoother traffic flow.
- Improve intersections by providing more left-hand turn lanes and medians.
- Implement traffic “calming” techniques to protect residential neighborhoods from traffic intrusion.
- Reconfigure North Orange Grove Avenue in South Pasadena and signalize the 110 freeway intersection. (*Completed)*
- Coordinate light railway, bus and shuttle schedules.
- Complete the Gold Line from L.A. to Pasadena. (*Completed)*

Projects outside the Corridor

- Complete the Gold Line into eastern San Gabriel Valley. (In-process)
- Complete Alameda Corridor East (ACE) projects, allowing N-S arterials to cross the railroad unimpeded. (*In-process)*
- Create overpass at Valley Boulevard, Marianna Avenue, and Alhambra Drive. (*Completed)*
- Launch METRO transit projects imbedded in Measure R funding. (e.g., L.A.’s 30/10 Plan)
- Convert port loading and unloading to rail technology.
- Establish modal centers outside the City to streamline cargo distribution by rail.

Multi-Mode Low Build will

- Save taxpayers an enormous amount of money
- Prevent increases in air and noise pollution
- Create jobs now
- Address the region's transportation problems now rather than later.

Written by Harry Knapp, South Pasadena Resident

Appendix E
Alternative Solutions

References for Narrative

Multi-Mode, Low Build Alternative (Printed)

Support Documents for Declarative Statements (Links)

Trucking is Toxic
No Such Thing as Clean Diesel Trucks

http://articles.latimes.com/2010/jul/08/opinion/la-oe-polakovic-20100708
Breathing the filth
Hydrocarbons in the air are more toxic than oil in the gulf.
By Gary Polakovic, July 08, 2010, LA Times

http://www.examiner.com/environmental-policy-in-national/correction-to-story-clean-diesel-arrives-and-exceeds-the-grade
Correction to Story Clean Diesel Arrives and Exceeds the Grade
Jon Anderson, Environmental Policy Examiner, December 19th, 2010 11:17 am ET
… correction to the story Clean Diesel Arrives and Exceeds the Grade because nitrogen oxide has always been a problem for diesel in warm climates…NOx is a major problem from all diesel engines. … especially if you have lung or heart function problems, work outdoors, or have children or elderly parents….A very deep divide over carbon control and traditional pollutants control exists at every level of government in the United States…Clean diesel is not clean (re☺ the same to pollutants it has always been a problem with, nitrogen oxides and particulate matter. Diesel may work in Europe where ground level ozone is not a major problem. But in the United States and the tropical cities of the world where most of the population of the planet lives, diesel must be banned.

http://news.sciencemag.org/sciencenow/2010/03/clean-diesel-not-so-precious-aft.html
Clean Diesel: Not So Precious After All, Tim Wogan on 26 March 2010, 11:27 AM, Science Now
Now scientists have produced a new type of catalytic converter…Chemical engineer Jan Stepanek of the Institute of Chemical Technology in Prague foresees another potential problem. "It is well known that, due to automotive catalyst decay, there are appreciable concentrations of precious metals near roads," he says….But the team's new design contains strontium, which is thought to stunt the growth of children. If this were released from an aging catalytic converter, says Stepanek, it might be more dangerous.

http://buildaroo.com/news/article/new-catalytic-converters-diesel-engines-environmentally-friendly/
New Catalytic Converters Can Make Diesel Engines Environmentally Friendly (Not)
BY TALI AARON : APRIL 1
A new catalytic converter…There are concerns about the environmental impact of this converter, however, and a chemical engineer at the Institute of Chemical Technology in Prague, Jan Stepanek, commented that "due to automotive catalyst decay, there are appreciable concentrations of precious metals near roads."…But the introduction of strontium to the design has raised concerns that aging catalytic converters could leak this potentially hazardous material into the water table. Also, the perovskite reacts to the sulfur content in the diesel, and can be deactivated if the converter reaches temperatures over 700 degrees Centigrade.

Roads Create Congestion, Not Solve It

http://aca.ninemsn.com.au/article.aspx?id=631599
[Aired Ch 9, 15th September, 2008]
Demonstrating that building major roads creates rather than solves congestion.

http://www.fhwa.dot.gov/publications/publicroads/07july/06.cfm
Perspective on Freight Congestion by Crystal Jones July/August 2007 · Vol. 71 · No. 1
"We have $125,000 trucks and drivers going 4 miles [6 kilometers] an hour on congested highways."…. Freight bottlenecks are found on highways serving major international gateways such as the San Pedro Bay port complex, which includes the Los Angeles/Long Beach Port
Congestion reduction is a critical and national priority for the U.S. Department of Transportation (USDOT). USDOT's *National Strategy to Reduce Congestion on America's Transportation Network*, also known as the Congestion Initiative, includes a six-point plan to reduce congestion in the short term and build the foundation for success in the longer term. The Congestion Initiative's activities that relate most directly to freight movement include targeting major freight bottlenecks, expanding freight policy outreach, incorporating private sector investment resources, and establishing USDOT's Corridors of the Future program. In 2006, USDOT proposed the Framework for a National Freight Policy, which works hand-in-glove with the Congestion Initiative to improve freight movement and decrease congestion. The Framework for a National Freight Policy focuses on the first objective of the Congestion Initiative — reducing major freight bottlenecks and building an outreach component to bring together the public and private sectors to address seven key goals:

- *Maximize safety and security* of the freight transportation system — "job one" every day for USDOT
- *Improve the operation* of the existing freight transportation system, including changing how the public and private sectors use the freight system to improve throughput or capacity
- ***Add physical capacity*** to the freight transportation system wherever investment improves system throughput
- *Use pricing* to improve alignment of costs and benefits between freight system users and owners and to encourage deployment of productivity-enhancing technologies
- ***Reduce or remove statutory, regulatory****, and institutional barriers* to improved performance in freight transportation
- *Proactively identify and address emerging transportation needs*, including conducting research into freight movement, data, and modeling to improve investment choices and understanding of freight movement
- *Mitigate and better manage environmental, health, and community impacts* of freight transportation

…Allen Lund, a transportation third-party logistics provider based in La Cañada, CA, commented in a 2003 interview with *Logistics Today,* "We have $125,000 trucks and drivers going 4 miles [6 kilometers] an hour on congested highways."…. Freight bottlenecks are found on highways serving major international gateways such as the San Pedro Bay port complex, which includes the Los Angeles/Long Beach Port,…
…Jack Kyser, chief economist for the Los Angeles County Economic Development Corporation, wrote in his white paper "Goods Movement in Southern California: How Can We Solve Problems and Generate New State Sales and Income Tax Revenues?": "As one of the Nation's premier global gateways, southern

California connects the region, the State, and the rest of the country with the dynamic economies of Asia. The volume of trade flowing through our ports has surged in recent years and is expected to at least triple over the next 20 years." Recognizing the importance of the California region and the necessity to ensure that transportation capacity is adequate to meet future demand, the Congestion Initiative will transform USDOT's existing Gateway Team in southern California into a larger "Southern California freight congestion team." The initiative charges the team to "convene the region's diverse freight stakeholder community to forge consensus on immediate and longer term transportation solutions." This partnership approach to addressing bottlenecks at or near international gateways then could be replicated at other locations throughout the Nation.
Unlocking key freight bottlenecks, such as in southern California, is a vital strategy to improve freight movement, but it is just one piece of the puzzle. Solving the full spectrum of freight movement constraints in the long and short terms will require coordinated collaborative action from public and private parties.

Roads are a Dead End

http://www.road-scholar.org/peak-traffic.html
Transportation triage at the end of the age of oil
by Mark Robinowitz, originally published May 10, 2006, From the Wilderness
An engaging discussion of the effects of Peak Oil on automobile traffic, Mark Robinowitz examines the ridiculousness of implementing "superhighway" plans while the nation faces an inevitable oil drop-off.

http://www.energyandcapital.com/articles/wikileaks-saudi-oil-lies-exposed/1423
WikiLeaks: Saudi Oil Lies Exposed, Turning Our Back on OPEC
By Keith Kohl, *Wednesday, February 9th, 2011*
The EIA projects U.S. crude production to fall by 50,000 bbls/d in 2011 and another 190,000 bbls/d in 2012...

Better Solutions to the Tunnel

http://labusinessjournal.com/news/2010/aug/09/end-road-710/
End of the Road for the 710?
OP-ED: Razing the freeway would be the best path to easing traffic between Long Beach and San Gabriel Valley. By Richard Risemberg, Monday, August 9, 2010
If we really want to improve traffic flow between Long Beach and the San Gabriel Valley, we should tear down the entire 710, because it is inherently inadequate to the task.
"The basic problem with urban/suburban freeways is that they take up so much space for the capacity they deliver. At 1,500 cars per lane per hour, a six-lane freeway's maximum capacity is about 11,000 people per hour ... within a 300 foot right-of-way. Urban rail systems can deliver as much or more capacity in 100 foot or less of (right-of-way). ... Heavy-rail systems like the Washington Metrorail have five times the capacity of a six-lane freeway in about one-third the space and cost about the same per mile as the Century Freeway in Los Angeles."… But what about freight, the real reason for the 710 (despite some proponents' bland assertions that trucks would be banned from the extension)? The solution is simple: heavy rail for freight to complement light rail for people. Build another Alameda Corridor trench along the 710's route, run light rail on spans above the trench for passengers, add a bicycle freeway alongside and throw in a two-lane road for local travel. You could even electrify the freight route, lessening its impact even further, and run shuttle trains (operated by the city or a contractor) between the harbors and the big main freight yards in Colton. Instead of crushing neighborhoods with noise, pollution and induced traffic on feeder roads, or walling them off with highways a quarter-mile wide, you would increase the freight and passenger capacity of the corridor, reduce pollution and noise, lessen congestion, and free up precious land for tax-paying homes and businesses, schools and civic facilities, and parks, and even urban farms.. Radical? Maybe. Sensible, responsible and profitable? You bet!

http://la.streetsblog.org/2011/04/13/editorial-don't-extend-the-710shrink-it-and-expand-alternatives/
Editorial: Don't extend the 710;Shrink It and Expand Alternatives
by Mark Vallianatos on April 13, 2011
Others interested in this project are submitting comments focused on the proper scope of environmental review of a mega tunnel. So I'm focusing on how the agencies should study and fund alternative mobility projects in the project area and remove, rather than expand, a portion of SR-710.

1. Remove the SR-710 freeway between the 10 freeway and Valley blvd by transforming it into a boulevard and/ or a linear park.
2. Expand transit to reduce car traffic and pollution and spur transit-oriented development
3. Create complete, living and green streets that promote safe walking and cycling and create vibrant public spaces.
4. Reduce freight truck traffic and pollution by expanding on dock rail at the Ports of Los Angeles and Long Beach.
5. Conduct a health impact assessment of all alternatives.
I believe that investing in these alternatives would better meet the goals "to relieve congestion and improve mobility within the project area" than would a freeway tunnel.

http://gcaptain.com/secretary-lahood-argues-case-transportation?23721
http://www.marad.dot.gov/documents/MTSNAC_Kickoff_(July_23_2009)_-_S1_Remarks.pdf
By gCaptain Staff, gCaptain, April 6th 2011
Secretary LaHood Argues Case of Better Transportation Use of America's Coasts, Waterways
U.S. Department of Transportation Secretary LaHood Remarks to: MTS Marine Transportation System National Advisory Council (MTSNAC) Meeting July 23, 2009
First, the administration is seeking advice on how to better integrate our waterways into our existing intermodal freight transportation system. We should take advantage of inherent environmental and energy benefits of marine transportation wherever possible – while reducing congestion on highways and rail lines.
Second, we're looking for advice on how to address the Congressional mandates of the Marine Highway Program. We must find ways to take better advantage of our existing waterways. This will help reduce land-based congestion and emissions, decrease our dependence on oil, and offer an alternative to building and maintaining costly new highway and rail systems…. As Congress and the Administration begin to debate the future of reauthorization for surface transportation, we will want advice on how the maritime industry can help us achieve integrated and environmentally sensitive transportation solutions.

http://www.thestranger.com/seattle/stop-the-insanity/Content?oid=7200124
Stop the Insanity, By DOMINIC HOLDEN March 15, 2011
The deep-bore tunnel is insane. Now is the time to stop it. There is a better option.

Freight by Rail is Better than Trucks
Cheaper, Safer, Cleaner, Faster, Tunnel not High a Performing Project

http://capntransit.blogspot.com/2011/04/moving-things-from-city-to-city.html
Moving things from city to city, Cap'n Transit Sunday, April 3, 2011
if we can shift a freight load from truck to rail or boat at no extra cost, it will be cheaper and use less energy, and most likely pollute less. If there is an added cost to shifting the load from truck to rail, that cost should be compared with the cost of keeping it on trucks. Reducing highway and fuel subsidies is one way to make the cost of trucking more apparent.Rail infrastructure costs about the same as roads, and once it's built, some combination of rail and boat (by sea, lake, river or canal) costs less to maintain and operate than trucks on roads…The freight question reduces to chemistry and physics: steel on steel has less rolling resistance than rubber on asphalt….Beyond energy efficiency, steel rails are also more durable than asphalt and rubber…Trains are also more efficient in terms of operating labor: the tracks and signals make it easier to predict what will be in the train's path, and where the train cars will go, which allows huge amounts of cargo to be moved by a handful of people…Ships and lake boats are more efficient than cars…the Department of Energy estimated that airplanes use 32,000 BTU of energy to move a ton of freight one mile, while trucks consume 3,100, boats 418 and trains 305 BTU per ton-mile (PDF, table 2.16).

http://www.eia.doe.gov/emeu/efficiency/ee_ch5.htm
Transportation Sector
Stephanie Battles, October 17, 1999,Independent Statistics & Analysis U.S. Energy Information Administration
http://cta.ornl.gov/data/tedb29/Edition29_Chapter02.pdf
Chapter 2 Energy
Summary Statistics from Tables in this Chapter

Airplanes use 32,000 BTU of energy to move a ton of freight one mile, while trucks consume 3,100, boats 418 and trains 305 BTU per ton-mile (PDF, table 2.16).

http://www.fra.dot.gov/Downloads/Comparative_Evaluation_Rail_Truck_Fuel_Efficiency.pdf
Comparative Evaluation of Rail and Truck Fuel Efficiency on Competitive Corridors Final Report
Federal Railroad Administration, November 19, 2009

http://www.gao.gov/new.items/d11134.pdf
SURFACE FREIGHT TRANSPORTATION
GAO United States Government Accountability Office, January 2011, Report to the Subcommittee on Select Revenue Measures, Committee on Ways and Means, House of Representatives
A Comparison of the Costs of Road, Rail, and Waterways Freight Shipments That Are Not Passed on to Consumers - If government policy gives one mode a cost advantage over another, by, for example, not recouping all the costs of that mode's use of infrastructure, then shipping prices and customers' use of freight modes can be distorted, reducing the overall efficiency of the nation's economy.
GAO's analysis shows that on average, additional freight service provided by trucks generated significantly more costs that are not passed on to consumers of that service than the same amount of freight service provided by either rail or water. GAO estimates that freight trucking costs that were not passed on to consumers were at least 6 times greater than rail costs and at least 9 times greater than waterways costs per million ton miles of freight transport. Most of these costs were external costs imposed on society. Marginal public infrastructure costs were significant only for trucking. Given limitations in the highway, rail, and waterway economic, financial, technical, and environmental data available for the analysis, GAO presents conservative estimates.

http://www.joc.com/government-regulation/mica-eyes-rail-get-more-trucks-cars-roadways
Mica Eyes Rail to Get More Trucks, Cars Off Roadways
John D. Boyd | Jan 13, 2011 3:57PM GMT, The Journal of Commerce Online - News Story
Goal would be to reduce roadway damage, trust fund spending on pavement repair….The new chairman of the House Transportation and Infrastructure Committee, signaling domestic transport goals similar to those of the Obama administration, says he wants to advance several initiatives that shift commercial truck loads and automobiles off the nation's stressed highways.

http://dc.streetsblog.org/2011/03/01/gao-trucking-the-least-efficient-mode-of-freight-shipping/
GAO: Trucking the Least Efficient Mode of Freight Shipping
by Tanya Snyder on March 1, 2011
Freight transportation, which accounts for nearly a quarter of transportation-related greenhouse gas emissions, doesn't get as much attention as passenger transportation because most people don't feel it affects them as much. But more than 15 million trucks deliver 70 percent of the goods this country consumes – and the GAO says that's a mistake.
The Government Accountability Office published a study finding that the costs of freight trucking that are not passed on to the consumer are at least six times greater than the equivalent rail costs and at least nine times greater than the equivalent waterways costs. Many of those are externalized costs passed on to society – like congestion, pollution, and crashes – as well as public costs, like infrastructure maintenance.

The Grid
Efficiency in Cargo Handling and Distribution

http://www.labusinessjournal.com/news/2010/aug/23/expanded-chinese-business-buoy-long-beach/
Expanded Chinese Business to Buoy Long Beach
By David Haldane
Monday, August 23, 2010
TRADE & TRANSPORT: Oakland-based Matson could add 234,000 more container units.
"The problem was that the cargo wasn't being handled efficiently."
As a result, he said, many importers – reacting to what they perceived as insurmountable problems causing congestion and delays – began turning away from Southern California amid the boom in international trade in favor of ports such as Norfolk, Va.; Charleston, N.C.; and Savannah, Ga.
"The congestion was the poster child, but what was happening was that the importers were deciding, based on their experiences, not to put all their eggs in one basket," Bingham said.

http://www.glendalenewspress.com/news/tn-gnp-tunnel-20110117,0,2928212.story
A new wave against 710 tunnel
Former port worker presents plan to scrap the idea in favor of a high-tech cargo rail.
By Bill Kisliuk January 17, 2011 | 11:14 am LA Times
an alternative plan for improving traffic flow… Alba proposed a cargo rail pipeline running alongside the San Gabriel River and then out to the warehouses in Ontario, saving an estimated 2.5 million truck trips a year from the harbor along the 710 Freeway to the Inland Empire.

http://aiapf.org/calendardisplayevent.cfm?event=335800&date=11-Feb-2011
February First Friday Forum Grid: The (San) Gabriel River Infrastructure Development
The American Institute of Architects Pasadena & Foothill, 11 Feb 2011
The movement of cargo containers out of the Ports of Los Angeles and Long Beach is a major rationale for the completion of the 710 Freeway….The tunnel alternative lies in accordance with Caltrans' modus operandi, but there are other solutions unaffiliated with Caltrans that are more radical and potentially superior regarding environmental concerns. NEPA does require consideration in an EIR of all such alternatives. There are at least three outside alternatives, the Multi Mode Low Build Alternative, the Cargo Way, and The Pipeline, also known as the GRID, or (San) Gabriel River Infrastructure Development. Of these, the Cargo Way and the GRID focus on rapidly moving containers out of the ports, past the densely populated areas nearer the water, to the proposed "Inland Port" in Ontario. Both systems use non-polluting propulsion on dedicated transit ways, environmentally superior to trucks on freeways burning fossil fuels….The GRID …"container conveyors" run in an underground pipeline, a large portion of which will be in the embankment of the San Gabriel River. Parallel pipelines for other purposes, such as power transmission and light rail can be installed as well. To facilitate the container conveyor movement, the proposal redirects pending investment for the ports into a computerized "Empty/Loaded Container Storage and Transfer Center," or ECSTC. This "feeds" the container conveyor in a highly efficient way, sending containers in an organized way to the Inland Port.

http://sunroomdesk.com/2011/01/19/futuristic-realistic-alternative-to-the-710-tunnel-the-grid-project/
Futuristic, Realistic Alternative to the 710 Tunnel: The GRID Project, Posted By: Editor
Development, Transportation Wednesday, January 19, 2011
Transforming the port of Long Beach into a fully electrified green facility, constructing a freight rail system underneath river channel levies to Inland Empire distribution centers, and reducing truck traffic through the densest parts of Southern California, are some of the great features of the Gabriel River Infrastructure Development (GRID) Project.

http://content.yudu.com/Library/A1cbbe/WorldCargoNewsJune09/resources/20.htm
Counting the cost of zero emissions
Cargo Handling, June 2009, World Cargo News
SkvStorage Systems vision is to create a "single stop" on-dock termlnal that would eliminate the need for railroads to build inland hubs. The concept is for a longer, thinner terminal with much greater crane density, able to handle a 10,000ft train in under 30 min.

http://www.newcolonist.com/vox/archive/GRID_project_ovr_2pg.pdf
GRID – Gabriel River Infrastructure Development
David Alba, Project Systems Designer
The Panama Canal is being widened to allow passage of large container ships. Once the wider canal is open, container ships from the Far East will have passage to US ports on the east coast…Ports have planned $1.5B upgrades, but these efficiency improvements are limited and the upgrades will not result in lower pollution levels…*Living Conditions Will Dramatically Decline for Citizens Living Along I-710…*Caltrans has proposed to widen the southern part of I-710.. also proposed to build a toll tunnel in the San Gabriel Valley to extend I-710 to I-210…Both of these projects will increase local pollution levels and are strongly opposed by environmental groups…GRID is a solution that merges economic imperatives with environmental concerns…*Streamline Ship-to-Rail Operations at the Ports* It's called the "Empty/Loaded Container Storage and Transfer Center", or ECSTC. This facility converts the space under shipping cranes into a computerized storage facility for empty and loaded containers. Containers are moved to and from ships directly into the ECSTC. Full-length trains drive under or adjacent to the ECSTC to be loaded or unloaded within the Port, so there is no intermediate shuffling of containers to off-site container transfer facilities to assemble trains for transport beyond Southern California. Use of the ECSTC could reduce

unloading…*Use Underground Pipeline for Electric Cargo Trains.. Embed Power and Water Transmission in the Freight Pipeline…Create Urban Parkways Interspersed with Environmentally Sustainable Neighborhood Clusters…Together, These Projects are the "Gabriel River Infrastructure Development", or GRID.*

CargoWay

Inexpensive, Quick to Implement, Near Zero Emission Congestion Relief

http://aiapf.org/calendardisplayevent.cfm?print=true&date=01%20Apr%202011&event=335786
April First Friday Forum - MMLB (Multi-Mode Low Build Alternative) & Cargoway
The American Institute of Architects Pasadena & Foothill, 01 Apr 2011
Overlooked by the Ports and Metro because the commissioned studies by URS/Cambridge Systematics were flawed. *Studies: Alternative Goods Movement Technology Analysis Initial Feasibility Study Report and Alternative Container Transportation Technology Evaluation and Comparison.*
The CargoWay is an integrated, dual-mode, near-zero-emissions system consisting of electric and CNG-hybrid-powered cargo trams operating on a rail system that connects the Port of Los Angeles to the Inland corridor. It will augment and extend the existing Alameda rail transportation system already in place. The system and its components are developed by engineers affiliated with MegaRail, who have contributed considerable thought to the dilemmas common to all major trade centers—such as the Port of Los Angles and its surrounding economic region—posed by cargo transfer from port to distribution centers. The focus is on efficient, non-polluting, rapid, and cost-effective transfer of cargo and containers from the shipping source, where the volume and congestion are the greatest, to the diversified outlying hubs of distribution and transfer from which conventional truck and/or rail assume the most efficient means of further distribution to the end destinations.

http://www.megarail.com/CargoRail_Heavy_Cargo/

http://www.megarail.com/pdf/CRPTOP-U.pdf

http://www.megarail.com/pdf/CRLBLA-7a.pdf

http://www.megarail.com/pdf/HCGEN5-1.pdf

Multi-Mode, Low Build

http://aiapf.org/calendardisplayevent.cfm?print=true&date=01%20Apr%202011&event=335786
April First Friday Forum - MMLB (Multi-Mode Low Build Alternative) & CargoWay
The American Institute of Architects Pasadena & Foothill , 01 Apr 2011

- The MMLB proposes a series of lighter touches at various choke points along the corridor as it filters through the El Sereno, Alhambra, South Pasadena, and Pasadena communities. Some of these solutions are already in process, such as the ACE corridor extension and the Gold Line eastern extension, while others are already completed, such as the Glenarm/Raymond on-ramp to the 110 and the North Orange Grove reconfiguration with signalization at the 110 crossing. In conjunction a further series of improvements, such as extending the 710 to Mission Road and adding an off-ramp at Cal State LA, will relieve congestion at critical bottlenecks… provide a separate, efficient, high-capacity cargo transport system that will alleviate air pollution imposed on all communities along the 710 from the port to the interior.
- …provide a series of sensible improvements and upgrades to existing surface roads, entrance ramps, and bridges over rail tracks that will re-link severed arteries in the existing road systems.
- …enhance or complete existing and new transportation systems including light rail, Alameda Corridor East (ACE), buses, shuttles, and bicycle paths.
- …provide a more fully-integrated solution to the regional cargo transport and passenger vehicle transportation systems at an equal or likely lesser cost than other proposals.
- …decrease pollution and increase mobility on a system already choked to capacity with truck and passenger vehicles.
- …restore and preserve the urban fabric and livability of all communities along this transportation system, which is vital to the region.

http://www.acta.org/
http://www.theaceproject.org/
Alameda Corridor Transportation Authority
ACE Trade Corridor/ ACE Project San Gabriel Valley
Capacity could be greatly increased if combined with CargoWay system

http://www.thetransitcoalition.us/newspdf/wdn20100907a.pdf
Trench Project for San Gabriel railroad crossings moves forward
By James Figueroa Staff Writer

http://articles.latimes.com/2006/nov/28/local/me-maglev28
Ports considering maglev trains to cut smog
Officials see magnetic levitation technology as a clean, high-speed way to move goods inland, ease traffic congestion and reduce pollution.
November 28, 2006|Dan Weikel | Times Staff Writer
Searching for ways to reduce air pollution and highway congestion, local harbor officials might resort to so-called maglev trains to haul cargo containers to and from the Los Angeles and Long Beach ports -- the first freight application of the technology anywhere in the world. Now under study at Cal State Long Beach are three maglev proposals to shuttle cargo to rail yards in Los Angeles and to inland distribution centers in Victorville and Beaumont. Maglev, or magnetic levitation, trains produce no air pollution along their routes and are powered by magnetic fields in guideways that pull them along at speeds up to 300 mph. So far, two systems have been built for commercial passenger service in China and Japan. Adapted for freight, researchers say, maglev trains could do the work of thousands of trucks and conventional locomotives, cutting harmful emissions in the port area and alleviating congestion on rail and highway corridors that serve the nation's largest harbor complex.
This would work if integrated into "the Grid" system

http://www.healthimpactproject.org/resources/document/State-Route-520-Bridge.pdf
SR 520 Health Impact Assessment Recommendations
A bridge to a healthier community
Tim Whelan, September 2008 Transit, Bicycling and Walking
PDF pg 11 (doc page 19) Increasing and improving transit service and providing bicycling and walking facilities in the corridor will provide multiple health benefits by reducing
greenhouse gas emissions and other air pollutants through the use of alternatives
to single-occupant vehicles, increased opportunities for physical activity, and
improved social connections.

http://articles.latimes.com/2010/may/13/business/la-fi-lazarus-20100514
Fixes needed for L.A. public transit system
Among them: Adopt a regional approach, make transit more convenient and create more online resources.
David Lazarus, May 13, 2010, LA Times

http://www.calpirg.org/issues/transit/la-public-transit
Build L.A. Public Transit Now
California Public Interest Research Group

Environmental Justice

http://www.newgeography.com/content/00467-city-planning-and-the-politics-pollution
City Planning And The Politics Of Pollution
By Greg Critser, New Geography 12/11/2008

http://egpnews.com/?p=16949
Commerce Freeway Plan Could Displace Neighborhood
By Elizabeth Hsing-Huei Chou, EGP Staff Writer March 25, 2010

http://juh.sagepub.com/content/30/5/729.abstract
Matthew W. Roth

Whittier Boulevard, Sixth Street Bridge, and the Origins of Transportation Exploitation in East Los Angeles Journal of Urban History July 2004 30: 729-748, doi:10.1177/0096144204265187

http://www.techtransfer.berkeley.edu/newsletter/03-1/ej.php
Environmental Justice Handbook Debuts
By Linda Howe-Steiger From Tech Transfer Newsletter, Winter 2003
"Environmental Justice" -- or EJ -- is actually a long-standing principle of American governance combining civil rights with environmental protection.
The concept embraces environmental health, equity, and conservation issues and has been defined by US DOT as a way of identifying and addressing any "disproportionately high or adverse effects [of projects] on minority or low income populations."… and those interested in sustainable development and new urbanism. The phrase "environmental justice" was coined only about ten years ago as a rallying cry in opposition to what was dubbed "environmental racism." The terms refer to the intentional or unintentional creation of adverse environmental and health impacts on minority and low-income populations from a wide variety of public and private infrastructure and industry projects…. The legal basis for enforcement of environmental justice, however, derives from Title VI of the 1964 Civil Rights Act…and… the 1969 National Environmental Policy Act. NEPA… to ensure that all Americans are able to live in safe, healthy, productive, and pleasing surroundings and that public decision- makers consider and then mitigate significant adverse environmental impacts of a wide variety of public investments, including, transportation investments.

http://biodiversity.ca.gov/Meetings/archive/ej/ITS_EJhandbook.pdf
http://www.ciatrans.net/ejhandbook.pdf
Environmental Justice & Transportation
By Shannon Cairns, Jessica Greig And Martin Wachs, Published by the Institute of Transportation Studies at the, University of California Berkeley, Copyright © 2003 University of California Regents
The goals of environmental Justice - State and local transportation agencies have a legal obligation to Prevent discrimination and to protect the environment through their plans and programs.
The federal government has identified environmental justice as an important goal in transportation, and local and regional governments must incorporate environmental justice into transportation programs.
Some communities get the benefits of improved accessibility, faster trips, and congestion relief, while others experience fewer benefits…
Some communities suffer disproportionately from transportation programs' negative impacts, like air Pollution.

http://www.justice.gov/crt/grants_statutes/legalman.php
TITLE VI LEGAL MANUAL
An on-line version of Title Six (VI) Legal Manual from the Civil Rights Division of the US Department of Justice.
U.S. Department of Justice, Civil Rights Division, P.O. Box 65560, Washington, D.C. 20035-6560, September, 1998

www.epa.gov/region9/ej/ej-resource-guide.pdf
Environmental Justice
Resource Guide U.S. Environmental Protection Agency, Pacific Southwest/Region 9, EPA-909-R-09-
A Handbook for Communities and Decision-Makers Enforcement EPA's enforcement programs may use EJ-related demographic information to target its inspections in areas where EJ communities could be most heavily affected by pollution and toxics.

http://timothyblee.com/2010/07/22/the-anti-urban-20th-century/
Freeways and the Decline of St. Louis
Posted on July 22, 2010 by Timothy B Lee
Driving a freeway through the middle of a healthy urban neighborhood not only destroys thousands of homes, it rips apart tightly integrated neighborhoods. Pedestrians rarely walk across freeways, so businesses near a new freeway are immediately deprived of half their customers. Similarly, residents near a new freeway lose access to half the businesses near them. The area along the freeway becomes what Jacobs calls a "border vacuum" and goes into a kind of death spiral: because it contains little pedestrian traffic, businesses there don't succeed. And because there are no interesting businesses there, even fewer people go there, which hurts the sales of businesses further from the freeway. The harms from such a freeway extends for blocks on either side….Carving up St. Louis with freeways didn't just undermine

individual neighborhoods; it permanently changed the region's culture. By undermining walkable urban neighborhoods while simultaneously making it easier to commute in from the suburbs, planners effected a massive transfer of wealth from cities to suburbs.

http://www.layouth.com/fighting-to-save-my-home/
Fighting to save my home - A proposed freeway extension could demolish the houses in my neighborhood
By Audrey Salas The newspaper by and about teens LA youth October 2010 Issue
This wouldn't happen in a wealthier community. I overheard someone telling my mom that there were no freeways running through Beverly Hills or San Marino. That made me wonder: why is it that the poor have to deal with freeways? I think of it as an indirect form of oppression. The poor have to accept what they're given while the rich enjoy their untouched neighborhoods.

http://www.hsp.org/node/2573
Philadelphia's Chinatown: An Overview – Historical society of Pennsylvania
Activism and the "Save Chinatown" Movement Construction plans for Market East, the Vine Street Expressway, and the Convention Center literally boxed Chinatown in from all sides and entailed the demolition of many homes and institutions.

http://www.no710.com/rod/comment5.pdf
State Route 710 Freeway Extension (Route 10 To Route 210) Record Of Decision
Record Of Additional Comments Received On Environmental Justice, Historic Preservation, And Other Issues - Volume V, Prepared by: California Department of Transportation, Office of Environmental Planning, 120 South Spring Street, Los Angeles, CA 90012, April 8, 1998 - Prepared for: Federal Highway Administration, California Division, 980 Ninth Street, Suite 400, Sacramento, CA 95814-2724

http://articles.latimes.com/2011/mar/17/opinion/la-ed-carpool-20110317/2
If L.A. freeways aren't free
Los Angeles Times, March 17, 2011
Both Rep. Gary G. Miller (R-Diamond Bar) and Rep. Maxine Waters (D-Los Angeles) have said they will try to block the demonstration project even though it is in the late planning stages. Waters says it sets up "a traffic system of haves and have-nots."
Opponents of the plan see something fundamentally undemocratic and inequitable about such "congestion pricing." Freeways are a public benefit, traditionally available to all. Yet now, critics say, the roads would be operated under a two-tier system that would allow those with money to speed to their destinations while poor people would watch unhappily from the traffic-jammed sidelines. What's next? Wealthy people paying for faster ambulance service or buying their way out of jury duty? Both Rep. Gary G. Miller (R-Diamond Bar) and Rep. Maxine Waters (D-Los Angeles) have said they will try to block the demonstration project even though it is in the late planning stages. Waters says it sets up "a traffic system of haves and have-nots."

Value Capture

http://cdn.publicinterestnetwork.org/assets/24d1f7a858b544c68fcf9eadfdf8a88a/ARRA-jobs-report.pdf
The latest data on stimulus spending show that funds spent on public transportation were a more effective job creator than stimulus funds spent on highways.

http://www.vtpi.org/smith.pdf
Financing Transit Systems Through Value Capture
An Annotated Bibliography
This paper summarizes the findings of nearly 100 studies concerning the impacts of transit service on nearby property values, and the feasibility of capturing this additional value to finance transit improvements. The results indicate that proximity to transit often increases property values enough to offset some or all of transit system capital costs.

http://www.transportationequity.org/images/downloads/MoreTransit=MoreJobs-final.pdf
The Impact of Increasing Funding for Public Transit - More Transit = More Jobs
By Todd Swanstrom, Will Winter, and Laura Wiedlocher, Public Policy Research Center, University of Missouri–St. Louis, Transportation Equity Network, www.transportationequity.org

Miscellaneous

http://www.wired.com/autopia/2010/01/jobs-for-main-street-act/
To Create Jobs, Build Public Transit, Not Highways
By Keith Barry January 21, 2010, 9:20 am, Autopia
If we'd spent as much federal stimulus money on public transportation as we spent on highways, we would have created twice as much work and put a bigger dent in the unemployment rate. That's the analysis of stimulus spending by Smart Growth America, the Center for Neighborhood Technology and U.S. PIRG, the public-policy lobbying group. Smart Growth America found that every billion dollars spent on public transportation produced 16,419 job-months, while the same amount spent on highway infrastructure projects produced 8,781 job-months. Now it is warning that the Jobs for Main Street Act of 2010 (.pdf), the $154 billion jobs bill the House of Representatives passed last month, could make the same mistake in funding the wrong priorities. The legislation, which the Senate is expected to take up early this year.. allocates $27.1 billion for highways and other surface transportation and just $8.4 billion for public transportation. That's a mistake. "When the Senate takes the bill up and it goes back to the House, they ought to take a look at their own data and readjust the proportions," William Schroeer, state policy director for Smart Growth America, told Wired.com. "Since it's a jobs bill, that seems to us to be something they ought to think very seriously about." By splitting public transportation and highway funding equally, Schroeer said, the bill could provide 71,415 more job-months of work than it would by favoring highway spending. That is enough work to give 6,000 more people full-time year-round employment. According to SGA, public transportation spending leads more directly to job growth than highway spending for several reasons. First, less money is spent acquiring land, which means more money is spent actually building something. Second, all those buses, trains and subways need people to operate them and maintain the infrastructure. And third, public transit requires a workforce with more diverse skills than highway construction. Even better, Schroeer said, public transit can help *save* jobs because it allows people to get to work — and those are jobs Smart Growth America didn't include in its analysis. When transit programs are cut or don't exist to begin with, "there's a negative impact on folks' mobility to get to work, to get to education," Schroeer said. "It's part of the fabric of communities, whether you use it or not." One reason public transit got short shrift in the stimulus package and some policymakers don't see the merit of such projects is the misconception that transit projects aren't "shovel-ready," and — as a result — job growth would lag. The report proves that myth wrong. "In today's environment, there are so many public transportation needs, and as a result there are so many public transportation projects that are ready to go, there's no difference in the spend rates between roads and public transportation," Schroeer said…. The bottom line is, investing heavily in public transportation puts more people to work while creating or improving infrastructure we need more of. It's a win-win.

SR-710 NORTH GAP CLOSURE PROJECT
SCOPING SUBMISSION BY THE NO 710 ACTION COMMITTEE

RECEIVED BY _____

TITLE Senior Env Planner

DATE 4/14/11 TIME 14:15

PASADENA HERITAGE
651 South St. John Avenue
Pasadena, California 91105
626 441-6333
www.pasadenaheritage.org

April 14, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

RE: Notice of Preparation and Scoping Comments for 710 Freeway Extension

Dear Mr. Kosinski:

On behalf of Pasadena Heritage, I am writing to offer our input on the scope of the environmental study needed on the newest proposal for the 710 Freeway Extension. For all of Pasadena Heritage's 34-year history, we have been on record opposing the 710 Freeway extension because of the dire consequences it presented for historic Pasadena homes and neighborhoods. We understand that the newest option to consider a tunnel has prompted the need for renewed study of the options for extension of the 710 and their potential impacts.

First, we object to the characterization of this proposed project as the "710 Freeway Gap Closure". The implication that there is a missing piece of the 710 freeway is misleading and prejudicial to full and objective consideration of transportation alternatives. We agree that the adoption of transportation improvements to reduce and improve vehicular traffic in Southern California, and in Pasadena and adjacent communities in particular, is a worthy goal shared by virtually everyone. But, there is no "gap" in the 710 Freeway and we respectfully request that this project be officially referred to as the 710 Extension.

We respectfully request that the EIR/EIS include research, study and analysis of the following:

Study of All Proposed Tunnel Routes
We recall that Caltrans hired consultants to do geotechnical studies in five areas and that it was concluded that a tunnel could be built in any and all of them.
At that time, the Director of Caltrans, Doug Failing, and the experts stated that that in-depth "route-neutral" studies of all potential routes would be included in the EIR/EIS. We want to be sure that all five potential tunnel options are studied for their potential environmental impacts.

Study of Other Transportation Alternatives
The focus of discussion over the past few years has been the possibility and viability of deep tunneling. While this possibility has emerged as one way that might successfully move traffic

without requiring the demolition of historic buildings and mature trees, there are still known and unknown consequences which must be thoroughly analyzed in the EIR/EIR studies. However, any and all other modes of transportation, and combinations of transportation alternatives that might accomplish the same goals must be included in the study. Caltrans and the public will not be able to fully understand or compare the options and their relative risks without that information.

Historic /Resources
As the local historic preservation organization, with more than 1100 household members (the second largest preservation organization in California), the primary focus of our past and present concerns is the potential impact on historic resources. A new historic survey of all properties along all five proposed routes is essential and required under the Cultural Resource section of the EIR/EIS. Although there is information available from prior studies, much of it is outdated and now inaccurate or incomplete. New areas under consideration need comprehensive analysis as well. An experienced historic preservation professional needs to be part of the study team and can work with other involved and concerned agencies, including the State Office of Historic Preservation, the Los Angeles Conservancy, Pasadena Heritage and any other preservation organizations in the vicinity. Not only the demolition of historic resources, but other possible impacts on historic structures must be considered in this analysis.

Air Quality
The EIR/EIS must include a complete and thorough air quality impact analysis for all five routes under consideration. Air quality inside the tunnels and outside, at exits and around the cleaning towers must be studied. Air quality analysis (along with traffic and circulation impacts) should also include likely travel paths for cars leaving the tunnels when congestion or accidents make the tunnels the least desirable option. Once directed into the tunnels, where will they go if forced to leave the tunnels and how will traffic and air quality impacts change under those conditions. There are many historic resources adjacent to the proposed tunnel route in Pasadena, and a cleaning tower location has been identified close to those buildings. Even more importantly, there are more than a dozen schools, parks, medical facilities (including our major regional hospital), and families in the immediate area. This is of great concern.

Thank you for this opportunity to comment. We look forward to a well planned and comprehensive environmental document that will help us all evaluate the best options for improving and reducing traffic in our communities.

Sincerely yours

(signed)

Susan N. Mossman
Executive Director

Submitted via email on 4-14-2011; hard copy to follow by U.S. mail.

Ron Kosinski/D07/Caltrans/CAGov
04/15/2011 12:36 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: SoPas Preservation Scoping comment

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:36 PM -----

Glen Duncan <gduncan@earthlink.net>
04/14/2011 09:19 PM

To <Ron_Kosinski@dot.ca.gov>
cc
Subject SoPas Preservation Scoping comment

Dear Ron,

710scoping ltr.doc

I am including Scoping Comments from the South Pasadena Preservation Foundation herein as an attachment (on letterhead)

...and also as text only text below (if you cannot open the attachment).

April 14, 2011

Ron Kosinski, Deputy District Director

Division of Environmental Planning

Caltrans, District 7

100 Main Street, MS 16A

Los Angeles, CA 90012

As you know, the South Pasadena Preservation Foundation (SPPF) has been involved in the SR 710 Freeway Extension issue since the 1970's. Our original concerns primarily focused on the massive numbers of historic homes, mature trees and historic neighborhoods that would be destroyed by a surface (or cut-and-cover) freeway extension through El Sereno, South Pasadena, and Pasadena. As the project focus has shifted to a combination of a bored tunnel and massive

cut-and-cover sections at each end and near ventilation facilities, our concerns have likewise shifted.

Several factors have heightened this concern and mandate corrective action, First of all, neither Caltrans nor MTA appear to be seriously addressing environmental impacts, need for an independent cost-benefit analysis, or superior alternatives for moving people and goods within and beyond the project area. Second, the huge price tag for the project and the history of such projects costing many times more than promised to get political buy-in. And third, just as tunneling technology is apparently improving enough to make the actual boring technologically feasible, other technologies are providing:

- Far more detailed (and disturbing) data on the negative effects of automobile and truck exhaust emissions on health of people living near freeways…and presumably in the paths of exhaust plumes from ventilation towers, and...
- Better ways of downloading and transporting freight from the ports that could substantially reduce the number of trucks on area highways, reduce traffic congestion, and alleviate toxic emissions.

As a result of these broadened concerns, we submit that **before** any decision is made to initiate preparation of an Environmental Impact Report (EIR). the proposed 710 extension and any alternative tunnel alternative MUST include, at a minimum:

1. Thorough disclosure of project parameters, including extent and location of all-cut-and-cover construction; location, height, and projected dispersion patterns of exhaust plumes; Number and location of homes, businesses, historic homes and historic neighborhoods to be significantly impacted by the construction, including any cut-and-cover elements, ventilation towers, emergency egress facilities, etc.
2. A comprehensive plan to improve movement and mobility of people and freight through Arroyo-Verdugo and West San Gabriel Valley communities and beyond. The plan should research and analyze all transportation modes, including intermodal and co-modality solutions; journey planning; transportation network analysis, including transportation hubs and interchanges; technology; pricing; transportation programming, and capacity.
3. After the comprehensive mobility plan and multi-mode elements are developed, they should be reviewed and commented upon by affected governmental agencies and parties.
4. Subsequent to agency review and comment and after estimated costs of the tunnel and a comprehensive mobility plan with multi-mode elements are agreed to by Caltrans, MTA and primary opposition groups including SPPF, a thorough comparative cost-benefit analysis would be conducted by an independent research organization also agreed upon by the above parties.
5. The cost benefit analysis would include a preliminary assessment of the economic, environmental, and social costs and benefits of both alternatives. Part of this study should look at the public private partnership funding mechanism proposed for the tunnel in light of the economic failures of existing toll roads in Southern California.

In addition to the above measures designed to: **a**) Define the project (we are reminded by Doug Failing's repeatedly pronouncements that "[Caltrans and MTA] do not yet have a project"); and **b**) Demonstrate both financial feasibility and fiduciary responsibility BEFORE starting the

EIS/EIR process, we submit the following as mandatory elements of the EIR itself.

6. Thorough traffic analyses, including modeling, that demonstrates **a)** the effects of 710 Extension on traffic congestion on freeways and arterials in the Arroyo-Verdugo, San Gabriel Valley and adjacent areas; **b)** the increase or decrease (by location) and timing of in truck traffic; **c)** the effect of toll costs on projected use of the proposed tunnel, by personal vehicles and trucks; and **d)** where those vehicles will go if they do not choose to pay the tolls.

7. A description of how public safety will be protected and drivers and passengers will be evacuated when vehicle fires occur, filling the tunnels with smoke or when hazardous materials spill from trucks

8. Mitigation measures to reduce significant environmental impacts to the level of "insignificant." This must include, but not be limited to, impacts on air quality and health; cultural impact (loss of homes and disruption or destruction of neighborhood contexts); aesthetic impact (visual intrusion of 100 ft tall ventilation stacks, for example, cannot be adequately mitigated by screening with 30 ft tall trees); financial mitigation for loss or degradation of private properties, increased health insurance rates.

Thank you for your solicitation of public comment during the scoping process.

Glen Duncan, Board Member and 710 Liaison

South Pasadena Preservation Foundation

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CITY OF LOS ANGELES CALIFORNIA

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LAND USE & DEVELOPMENT COMMITTEE MEMBERS

VAL MARQUEZ
CO-CHAIR

JOHN CARBAJAL
CO-CHAIR

JOE MANZANO
STAKEHOLDER

received
4/12/11

April 7, 2011

Michael Miles
District 7 Director
Caltrans
100 S. Main Street,
Los Angeles, CA 90012

RE: Interstate Freeway 710 Expansion Project
Request for Caltrans Action

Dear Mr. Miles:

Thank you for the opportunity to allow the LA32 Neighborhood Council to provide you with our concern regarding the State Route 710 North Extension Project ("Gap Closure").

The LA32 NC Land Use and Development committee, residents and stakeholders were asked to participate in the Caltrans and METRO Environmental Impact discussions (SR710 Conversations) held at the Presbyterian Church on Eastern on Feb. 24, March 17, and March 29, 2011. Our committee is deeply concerned about the poor outreach, lack of information provided on meeting notices, community participation, and information offered by Caltrans and METRO representatives.

As you know, the community of El Sereno is primarily a working class and Latino neighborhood that suffers from many of the socio-economic inequalities affecting minority communities in Los Angeles. In fact, the U.S. Census data indicates that nearly 50% of adult residents suffer from limited language skills. Therefore, multi-jurisdictional public development projects, such as the SR-710 extension, need to ensure the provision of common language information in marketing and presentation material.

Meeting notices lack meaningful information as to the items that will be discussed and utilize acronyms that most stakeholders are unable to decipher, such as NEPA and CEQA. Language access is important for meaningful community participation and community planning and development decisions. Furthermore, discussion moderators were unsuccessful in providing a laymen's interpretation of each meeting's subject matter, community impact and key decision points for the above referenced project.

For example, at the February 24th meeting, someone posed the following question to the audience: What is scoping? Due to a lack of language access, no one from the audience replied with an answer. The meeting quickly spun out of control into a discussion of the intended meeting goals without addressing any actual goal.

Furthermore, discussion moderators were unable to outline the project emphasis that was undergoing Environmental Impact Statement. Are Caltrans and METRO proposing an above ground or tunnel expansion?

Lastly, Caltrans and METRO are placing an over-abundant emphasis on the San Gabriel Valley residents and nearly disregarding meaningful outreach to City of Los Angeles stakeholders. (Although participation at the March 29th meeting saw an increase in community attendance, due in part to the distribution of flyers by some concerned neighbors to affected area residents both in Los Angeles and Alhambra.) San Gabriel Valley, who would be impacted by only half of the proposed zones, and with only 20% of the county's population, has been provided with four of six meetings in each series, including two meetings that were "off-the-record," and one recorded as part of official CEQA process. As a comparison, the City of Los Angeles would be impacted also by three zones and maintains 40% of the county population, but has been extended only one meeting in each series. The fifth set of meetings was extended to stakeholders of the City of Glendale even though they are not directly impacted by any alternative of the project study area.

The leadership failings of Caltrans and METRO representatives have rekindled historic sentiments of community mistrust. The community and residents of El Sereno are grateful that you supported our effort to place the tunnel portal south of Valley Boulevard. As our elected representative on the METRO Board, we ask you to again look into these egregious errors in the community outreach process. The LA32 NC and the community of El Sereno seek your assistance again to improve stakeholder engagement in the community planning and decision making process of the SR-710 North Extension project. The goal of your action should be to:

- Increase and improve the number of official community meetings to address Environmental Impact issues per zone of impact
- Improve language accessibility for meeting notices and presentations
- Enhance Caltrans and METRO affinity relationships with community organizational trusted advisors to ensure sufficient community participation

We look forward to working with you in a productive manner to rectify the above referenced issue.

Sincerely,

Val Marquez
Co-Chair
Land Use and Development Committee
LA32 Neighborhood Council

Johnny Carbajal
Co-Chair
Land Use and Development Committee
LA32 Neighborhood Council

cc: Hon. Gilbert Cedillo, Assembly District 45
Hon. Ed Hernandez, Senate District 24
Hon. Kevin De Leon, Senate District
Hon. Judy Chu, Ph.D., Congresswoman, District 32
Hon. Eric Garcetti, LA Councilmember, CD 13
Gloria Molina, 1st District, Supervisor, LA County
Hon. Jose Huizar, LA Councilmember, CD 14
Doug Failing, Executive Director, Metro
Hon. Xavier Becerra, Congressman, District 31
Hon. Ed Reyes, LA Councilmember, CD 1
Hon. Mike Eng, Assembly District 49

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Charly Shelton, alternate

April 09, 2011

RECEIVED 4/14/11

Ronald Kosinski,
Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main St., MS 16A
Los Angeles, CA 90012

Re: 710 Gap Closure

The Crescenta Valley Town Council has previously submitted its position on the proposed 710 tunnel in letters dated June 11, 2009, March 10, 2010, and December 7, 2010. (A copy of each is enclosed.) The Council's position is the same - the Crescenta Valley Town Council remains strongly opposed to a proposal to close the gap and connect the 710 Freeway to the 210 Freeway by way of an underground tunnel. We support an alternative plan which would alleviate traffic congestion by the use of rail. The proposed tunnel connection will increase the traffic congestion on the already overburdened 210 freeway to the east and west.

On the other hand, the proposed rail alternative will be consistent with agency project goals of alleviating traffic congestion on the north and south arteries and local surface streets, improving regional travel time, reducing greenhouse gas emissions from mobile sources such as semi trucks, and will minimize the impact on local communities.

Additionally, we request that the La Crescenta/Montrose Area be provided with information regarding the scheduling of any future public meetings including scoping meetings, EIR/EIS review or public comment meetings, and other project meetings, in sufficient time so that the community's voice and response can be heard and made part of the record. We also request that the effect on the La Crescenta/Montrose area be included in the EIR/EIS study. We also request that our position and above comments be made part of the official record.

Respectfully,

Cheryl Davis
President
Enc: Letters dated 06/2009, 03/2010, 12/2010

P.O. Box 8676 La Crescenta, CA 91224-0676 p:818-248-9387 e:contact@thecvcouncil.com www.thecvcouncil.com

Crescenta Valley Town Council

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Kim Mattersteig

Charles Beatty, alternate

Silvana Casalegno, alternate

Kevin Kroeker, alternate

December 07, 2010

MTA Board of Directors
One Gateway Plaza
Los Angeles, CA 90012

Re: SR-710 Tunnel and the Crescenta Valley

Dear Sirs,

The Crescenta Valley Town Council is resubmitting an original correspondence drafted in June 2009 along with the current Council's re-approved correspondence dated May 20, 2010 with regard to the 710 tunnel project.

Please include these correspondences as part of your decision making process when the item on your December 9, 2010 agenda is voted upon.

Respectfully,

Cheryl Davis
President

cc:
Don Knabe
Antonio R. Villaraigosa, LA Mayor
Michael D. Antonovich, LA County Supervisor
Diane DuBois, City Council Member
John Fasana, City Council Member
José Huizar, City Council Member
Richard Katz
Gloria Molina, LA County Supervisor
Ara Najarian, Glendale Mayor
Pam O'Connor, City Council Member
Mark Ridley-Thomas, LA County Supervisor
Rita Robinson
Zev Yaroslavsky, LA County Supervisor

Enc: Correspondence dated June 11, 2009 2 pages
Correspondence dated May 20, 2010 2 pages

P.O. Box 8676 La Crescenta, CA 91224-0676 p:818-248-9387 e:contact@thecvcouncil.com www.thecvcouncil.com

Crescenta Valley Town Council

www.crescentavalleytowncouncil.org
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Kim Mattersteig

Charles Beatty, alternate

Silvana Casalegno, alternate

Kevin Kroeker, alternate

March 10, 2010

State of California Department of Transportation
3412 North Eastern Avenue
Los Angeles, CA 90032

Re: SR-710 Tunnel Technical Study, 2010 Community Meetings

Dear Sirs,

The Crescenta Valley Town Council is resubmitting a correspondence submitted in June 2009 with regard to 710 Tunnel project.

Please include this correspondence and the attached as part of the final geotechnical report.

Respectfully,

Cheryl Davis
President

enc: Letter dated June 11, 2009
2 pages

Crescenta Valley Town Council

www.crescentavalleytowncouncil.org
P.O. Box 8676
La Crescenta, CA 91224-0676
(818) 248-9387

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Frank Beyt
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Liz Arnold
Corresponding Secretary

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Danette Erickson

Steve Goldsworthy

Robert Thomas

Charles Beatty, alternate

Robbyn Battles, alternate

Joyce Lauterback, alternate

June 11, 2009

California Department of Transportation
District 7
100 S. Main Street
Los Angeles, CA 90012

Dear Sirs,

The Crescenta Valley Town Council is strongly opposed to the 710 Tunnel Project and the technical study which is underway.

While the first letter, sent May 17, 2007, has not had a response, let us be clear in this correspondence. As elected representatives of the unincorporated area in La Crescenta, we have recently held a public meeting in which there was strong opposition to the 710 Tunnel Project. We request that our opposition be acknowledged and filed along with other Foothill Communities.

It is estimated by experts that the 210 freeway thru the Crescenta Valley would bear the brunt of the traffic and congestion resulting from the completion of the 710 tunnel. This is not acceptable to us and we cannot see any type of mitigation that would ease this unequal burden that our community is asked to bear. Congestion, noise, and pollution from the additional traffic is unacceptable to our community.

Additionally, we are strongly opposed to the study in progress. Studying five zones, at an approximate cost of $10 million, is wasteful and irresponsible, with funds that could be better used elsewhere in our state, especially during this time of budget crisis. More consideration should be given to the way taxpayer money is spent and the way taxpayer concerns are addressed. It appears that this project has been decided upon and the "study" is merely a way to waste our money on a project not supported by a majority of municipalities.

Crescenta Valley Town Council

www.crescentavalleytowncouncil.org
P.O. Box 8676
La Crescenta, CA 91224-0676
(818) 248-9387

We support the alternate plan, proposed by Supervisor Michael Antonovich more than ten years ago, which would move containers from LA Ports to an inland site in Lancaster via rail. This would alleviate traffic congestion from many parts of Los Angeles as well as our community.

Sincerely,

Steve Pierce
President

CC:
NEIGHBORING COUNCILS:
City of Glendale
City of La Canada-Flintridge
City of Los Angeles – Neighborhood Council
-Wendy Gruel, Councilwoman

COUNTY OFFICIAL:
Michael Antonovich, Los Angeles County Supervisor

STATE OFFICIALS:
Arnold Schwarzenegger, Governor
Bob Huff, Senator
Carol Liu, Senator
George Runner, Senator
Anthony Adams, Assemblyman
Cameron Smyth, Assemblyman
Paul Krekorian, Assemblyman

FEDERAL OFFICIALS:
Barbara Boxer, Senator
Dianne Feinstein, Senator
Adam Schiff, Congressman
David Dreier, Congressman

Arlington Garden in Pasadena
295 Arlington Drive
Pasadena, CA 911105
626 441-4478
arlingtongarden@mac.com

March 21, 2011

Ron Kosinski RK
Deputy Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Re: EIR/EIS for SR710 Gap Closure

Dear Mr. Kosinski:

We are officers of Arlington Garden in Pasadena, a 501c3 corporation that has developed and now maintains Arlington Garden at 275 Arlington Drive in Pasadena, 91105. The 3 acre property is owned by Caltrans and is leased to the City of Pasadena until 2018 for the purposes of demonstrating to the public the efficiency and beauty of a waterwise garden that is in harmony with our Southern California climate.

As land for parks and open space in Pasadena dwindles, the City is considering more development of urban open space to provide its residents with a variety of public gathering places. Arlington Garden is Pasadena's only dedicated public garden and is named as a prime example of urban open space in Pasadena's Green Space, Recreation and Parks Element and Master Plan and in the proposed Open Space and Conservation Element now being considered for adoption.

Arlington Garden is nearly six years old and has 350 trees and thousands of plants, including hundreds of natives and other species that do well in our Southern California Mediterranean climate. The Garden has been recognized as a valuable part of Pasadena by the City Council, Pasadena Museum of History, West Pasadena Residents' Association, Pasadena Heritage, Pasadena Garden Club, Garden Conservancy, and in books and newspaper and magazine articles. It is visited by hundreds of people of all ages each day, including families and school children and scout troops who volunteer in the Garden and do school projects, and has become a demonstration of sustainability in that it has added leaf canopy to Pasadena and has used tons of recycled concrete, and has a series of berms and swales that keep water on the site during heavy rains.

Finally, Arlington Garden has become a place for many people to find quiet and serenity in an increasingly urbanized community. Please consider the project's impact on the Garden's ability to provide peace and quiet for people who come seeking it.

We request that the EIR/EIS examine the following factors in determining the environmental impact of the Project on Arlington Garden in Pasadena and its neighbors and visitors.

1. Aesthetics

a) Determine the impact upon the view of the Eastern part of the Garden from the Western end.

b) Determine the damage to scenic resources, particularly the Garden's trees.

c) Determine the degradation of the visual character of the Garden and the quality of the Garden.

d) Determine the light or glare that would adversely impact the views of the Garden.

II. Agriculture Resources

a) Determine the impact of the project on the 50 Washington Navel orange trees, which currently produce oranges for conversion into orange marmalade, which is a major source of revenue for the operation of the Garden.

III. Air Quality

a) Determine the impact of the project on the air quality of the Garden and its visitors, considering that the Garden is a public recreational gathering place frequented by persons of all ages during all hours of the day.

IV. Biological Resources

a) Determine the impact of the Project on the Garden's biological resources, including its over 60 species of birds, several trees protected by Pasadena policy and ordinances, and protected native plants.

X. Land Use and Planning

a) Determine whether the project will conflict with applicable land use plan or policy of Pasadena as reflected in the City's General Plan or zoning ordinances.

XII. Noise

a) Determine the impact of the project on Arlington Garden, particularly with respect to impact on visitors to the Garden.

XIII. Mandatory Findings of Significance

a) Determine whether the project will degrade the quality of the Garden's plant or animal life, particularly its rare and native plants.

b) ...

c) Determine the effect of the project on human beings, particularly children, neighbors and visitors to the Garden.

Thank you.

Sincerely,

Betty and Charles McKenney
President and Secretary of Arlington Garden in Pasadena, a 501c3 non profit Corporation
295 Arlington Drive
Pasadena, CA 91105
626 441-4478
arlingtongarden@mac.com

RECEIVED 4/20/11

April 19, 2011

James and Constance Haddad
Storrier Stearns Japanese Garden
270 Arlington Drive
Pasadena, CA 91105

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

Re: EIR/EIS for SR710 Gap Closure

Dear Mr. Kosinski:

It just came to our attention that Caltrans has formally initiated studies for the 710 Gap Closure Project. Our property is one of the properties that lies within that Gap. The decisions to be made will have a major impact upon our property, the Storrier Stearns Japanese Garden.

The garden, comprising almost two acres, is located at 270 Arlington Drive. Originally the property included 244 Arlington Drive until Caltrans took that lot by condemnation in the 1970s. It was used from then until several years ago as an office by Caltrans engineers. Since then, we have rented the 244 property back from Caltrans and have used the old building on the property as a storage shed.

The Storrier Stearns Japanese Garden was created in the late 1930s and early 1940s by Kinzuchi Fujii, a landscape designer and craftsman from Japan, for his patrons, Charles and Ellamae Storrier Stearns.

Kendall Brown, writer and professor of Asian art history, has described the garden as "an extremely important example of the Japanese-style garden genre" and "one of the best pre-war examples of a Japanese hill and pond style garden outside of Japan." In 2005 it was placed on the National Register of Historic Places and has also been listed in the California Register of Historical Resources (see enclosed copy of documentation).

The Garden is also recorded with the City of Pasadena under the Mills Act (California Government Code Section 50280) so as to retain its characteristics as a property of historical significance.

The Garden represents a major phenomenon in American cultural history, the appreciation and assimilation of Japanese design concepts and aesthetics beginning in the late 19th century and subsiding with the outbreak of World War II. Mr Fujii spent a year designing, planning, and preparing before construction began in 1937. All of the artifacts of granite, bronze, and wood were imported from Japan.

With its finely crafted teahouse, a 25 foot cascading waterfall, several smaller waterfalls, winding paths, tons of boulders and rocks, a granite slab "Devil's bridge" over the larger of two connecting ponds, and several other bridges, it is an authentic and stunning example of a "chisen-kaiyushiki" or a wet garden with a promenade—also referred to as "stroll gardens."

After the deaths of Mr. and Mrs. Storrier Stearns, James' mother Gamelia Haddad Poulsen bought the estate containing the Garden. Under her ownership, it continued to be a magnet for the Japanese community, as well as other civic and social organizations in and around Pasadena. It was sought out for tea ceremonies, music ensembles and dance, flower shows, flower arranging, tours, fund raisers for non profit organizations and myriad other social and cultural activities.

Several thousand people have participated in symposiums at the Garden devoted to the study of Japanese landscaping and attended events sponsored by the Pasadena Museum of History, Pasadena Heritage, Pacific Asia Museum, Los Angeles Conservancy, and The Garden Conservancy. It has been featured in a number of newspaper articles and magazines such as *Landscape Architect*

After Caltrans used Eminent Domain to acquire the property at 244 Arlington, the Garden went into decline because Caltrans also took an easement slicing 100 feet west across the entire Garden. Mrs. Poulsen felt that her priceless, historic Japanese Garden was fated to be destroyed. Ultimately the easement expired and after Mrs. Poulsen's death in 1985, we began the slow process of restoring the Garden.

The final restoration has been under the direction of Takeo Uesugi, a nationally recognized Japanese-American landscape architect and professor emeritus of Cal Poly Pomona whose projects include the James Irvine Garden in Los Angeles and the Japanese Friendship Garden in Balboa Park in San Diego. He is widely recognized as one of the leading Japanese landscaping authorities in the United States. Because of the importance of our Garden he has volunteered his services over the last several years. The restoration is nearing completion, at which time the Garden will again be available for semi-public use.

Of particular and urgent concern to us is the final disposition of the property at 244 Arlington for it is an integral part of the Garden. In a number of meetings with Douglas Failing and Linda Wilford we were encouraged to believe that the 244 property would become surplus and ultimately be available to be returned to our ownership. Our rental of the property was considered as a step in that direction.

In addition, we share the same concerns over the environmental and aesthetic impact of freeway development as our neighbors across the street from us: the Arlington Garden in Pasadena. Our two unique and beautiful gardens are a precious resource for the City which deserve to be protected and preserved.

Sincerely,

James Haddad Constance Haddad

James and Constance Haddad
Storrier Stearns Japanese Garden
270 Arlington Drive
Pasadena, CA 91105
626-799-3296 or 714-777-1241
constancehaddad@yahoo.com

enc.

STATE OF CALIFORNIA – THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P O BOX 942896
SACRAMENTO CA 94296-0001
(916) 653-6624 Fax (916) 653-9824
calshpo@ohp parks ca gov

April 6, 2005

Mr. James J. Haddad, Trustee
Gamelia Haddad Poulsen Trust
270 Arlington Drive
Pasadena, California 91105

Re: **Storrier-Stearns Japanese Garden**
National Register of Historic Places

To Whom It May Concern:

I am pleased to notify you that on February 15, 2005, Storrier-Stearns Japanese Garden was placed on the National Register of Historic Places. As a result of being placed on the National Register of Historic Places, this property has also been listed in the California Register of Historical Resources, pursuant to Section 4851(a)(2) of the Public Resources Code.

Placement on the National Register affords a property the honor of inclusion in the nation's official list of cultural resources worthy of preservation and provides a degree of protection from adverse affects resulting from federally funded or licensed projects. Registration provides a number of incentives for preservation of historic properties, including special building codes to facilitate the restoration of historic structures, and certain tax advantages.

There are no restrictions placed upon a private property owner with regard to normal use, maintenance, or sale of a property listed in the National Register. However, a project that may cause substantial adverse changes in the significance of a registered property may require compliance with local ordinances or the California Environmental Quality Act. In addition, registered properties damaged due to a natural disaster may be subject to the provisions of Section 5028 of the Public Resources Code regarding demolition or significant alterations, if imminent threat to life safety does not exist.

If you have any questions or require further information, please contact Maryln Bourne Lortie of the National Register Unit at (916) 653-8911.

Sincerely,

Milford Wayne Donaldson, FAIA
Acting State Historic Preservation Officer

D-3 – Individuals

Elise Kalfayan
1555 N. Pacific Ave.
Glendale CA 91202

RECEIVED 4/14/11

April 12, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans – District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

Demands for inclusion in the 710 Gap Closure Project Environmental Impact Report/Environmental Impact Statement:

Proof and detailed analysis of working business models with detailed explanations of how they will avoid incurring later costs to taxpayers (with past successful models in California as examples) for all public/private partnership models being considered for this project.

Cost-Benefit Analysis of the project for state taxpayers only. Include costs of not using these funds for multi-mode alternatives, electric cargo rail system construction, doing nothing.

Cost-Benefit Analysis, encompassing public monies spent, pollution, future workforce training, and regional competitiveness for an electric rail system for carrying all port cargo to inland distribution centers versus conventional freeway expansion to handle truck traffic carrying cargo on the 710.

Cost-Benefit Analysis of disaster impacts, with detailed costs of addressing structural damage, fire, toxic spills, accidents, injuries, and extended cleanup due to a major 9.0 earthquake. Compare these costs with a detailed analysis of costs of addressing such threats to an alternative multi-modal system with no freeway tunnel.

Cost-Benefit Analysis of steel on steel vs. rubber on asphalt. Quantify comparative fuel use, noise level impacts, and pollution in the region under an electrified rail system for moving port goods or "more of the same" (investment in more freeways) with rubber on asphalt as continued major transport mechanism for individuals and port goods transit, instead of steel on steel.

Cost-Benefit Analysis of significant public investment in freeway expansion instead of new rail and cargo movement technology that address regional competitiveness with major port upgrades in Panama, Mexico, the Gulf of Mexico, and other regions.

Clear and detailed cost-benefit analysis (which examines in just as much detail every alternative such as electrified rail and expanded public transit investments) for the stated "need and purpose" of the final project.

Detailed analysis and estimated costs for each area of potential cost overrun in a tunnel project, including excavation and construction of portals, ventilation towers, engineering, geological troubles, accidents, materials, and earth movement.

Submitted by Elise Kalfayan Elise Kalfayan

417 El Centro Street
South Pasadena, CA 91030
05 April 2011

Mr. Ron Kosinski
Deputy Director
Division of Environmental Planning
Caltrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

RE: SR-710 Environmental Impact Report/Scoping Request

Dear Ron:

It has been a long time. Hope you have been and are well. Please include the following three subject matters in the above mentioned impact report:

1) **What are the hydrology effects in the San Gabriel Basin and in the Raymond Basin by boring two 60 ft. diameter, 4-5 mi. long, 150ft-200ft deep tunnels through the Elysian Park Anticline (and its associated faults) and the Raymond Fault?** The Raymond Fault acts as a dam between these two basins, with the Raymond on the north side and the San Gabriel on the south. The EPA, in its Remedial Investigation Report of June 2009 has identified the Raymond Basin as a potential non-point source of contamination to the NE section of the San Gabriel Valley Area 3 Superfund site which embodies the San Gabriel Basin. Since this fault acts as a dam it would seem possible if not probable that boring of this magnitude would exacerbate contamination of Area 3, a source of drinking water for many cities in the San Gabriel Valley. Many of these water tables are at different depths and the faulting phenomena are a controlling factor on the water supply of this area. Figure 3-6 of the EPA report (partial attached) shows water flow contours at suggested tunnel depths. A geologic cross section showing varying well depths is also attached.

   Also, the geological disturbances may interfere with the baseline data collected by the EPA for its cleanup program for the Superfund site.

   I have attached a picture of a freeway damaged in the recent Japanese earthquake. Although Caltrans geologists have assured the populace that the tunnel would be the safest place to be during an earthquake, which may be true if current engineering standards can prevent a rupture, the question here is: What environmental effect is going on with respect to leakage between the two basins when something like this happens? If you remember, you hosted a Design Advisory Group (DAG) meeting in South Pasadena with the state geologist as a guest and his comment on the Raymond Fault worse case scenario was a 9 ft. slip.

2) **The Federal Injunction CV98-6996 (City of South Pasadena, et al v. Rodney E. Slater, et al) identified faults in the previous EIR/EIS as the following:**
    a) violations of Section 4(f) of the Dept. of Transportation Act with a failure to properly evaluate the Multi-Mode Low Build Alternative, failure to consider constructive use impacts, and a failure to fulfill commitment to analyze properties eligible for the California Register that were ineligible for the National Register
    b) violations of the National Environmental Policy Act (NEPA) with a failure to evaluate the Multi-Mode Low Build Alternative, and inappropriately failed to complete an SEIS
    c) violations of the Clean Air ACT as the project did not come from a conforming TIP and the analysis of emissions was flawed, particularly PM sub 10 hotspots

    It is noteworthy that Caltrans was recently written up by FHWA after it conducted its fifth audit of the MOU between it and Caltrans for reaching no conclusion on a Section 4(f) constructive use discussion (Federal Register, Vol. 76, No. 19/Friday, January 28, 2011).

    Also, the above mentioned injunction is not in compliance as Condition 8 (construction of traffic improvements) and Condition 10 (before and after analysis) have not been completed.

    The FHWA in its rescission letter dated Dec 17, 2003 on page 2 of 7 states that no comprehensive financial plan for the project had ever been produced and was a cause for its rescission as a ROD requires a financial plan to ensure its ultimate implementation. It appears that we are heading down that road again!

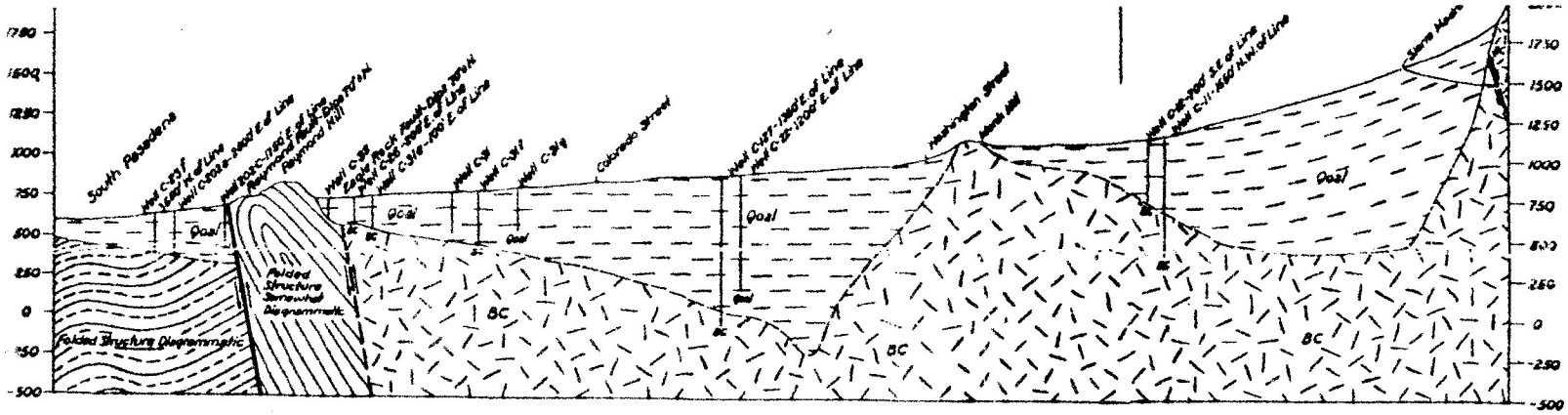
3) **As an alternative, the Multi-Mode Low Build (MMLB) should be evaluated on a regional basis.** The map enclosed in the NOP (147 sq. mi.) indicates a regional approach to solving transportation problems. The MMLB concept has undergone significant modifications since last addressed in the previous EIR/EIS. From a regional approach it should include projects such as SGVCOG's ACE project of eliminating at-grade rail crossings at the N-S arterials throughout the San Gabriel Valley. It should include the LADOT rail overpass to Eastern Ave. on Valley Blvd.; also, the right-hook 110 ramp on South Pasadena's Fair Oaks Ave. Los Angeles's original 12 transit projects in their 30/10 plan should be considered MMLB. In other words, there is no one MMLB project that would serve as an independent alternative, but a series of projects throughout the study area agreed upon by the communities involved that should be defined as MMLB.

Sincerely,

Harry A. Knapp

Attachments:

(1) Partial of Figure 3-6 from the EPA Remedial Investigation Report, June 2009
(2) Geologic Cross Section of Raymond Fault between South Pasadena & Pasadena
(3) Picture of destroyed roadway in Japan after earthquake (March 2011)



SECTION ALONG LINE P-Q-R LOOKING WEST

LEGEND

- Qal — RECENT ALLUVIUM
- Qoal — OLD ALLUVIUM
- Qaal — ANCIENT ALLUVIUM
- Ti — TERTIARY. TOPANGA FORMATION
- Tpsh — TERTIARY. PUENTE SHALE
- BC — CRYSTALLINE BASEMENT COMPLEX

- FAULT
- FAULT, LOCATION APPROXIMATE
- PROBABLE FAULT, LOCATION APPROXIMATE
- CONTACT
- CONTACT, APPROXIMATE
- CONTACT, UNCERTAIN

GEOLOGIC SECTIONS
ACROSS RAYMOND BASIN

BY JOHN P. BUWALDA
OCTOBER 1940

FOR LOCATION OF LINES OF SECTIONS SEE ACCOMPANYING GEO
AND BEDROCK TOPOGRAPHY MAPS.

BASED ON AREAL GEOLOGY, WELL LOGS IN FILES OF PASADE
WATER DEPARTMENT, AND GEOPHYSICAL SURVEYS.

HORIZONTAL SCALE

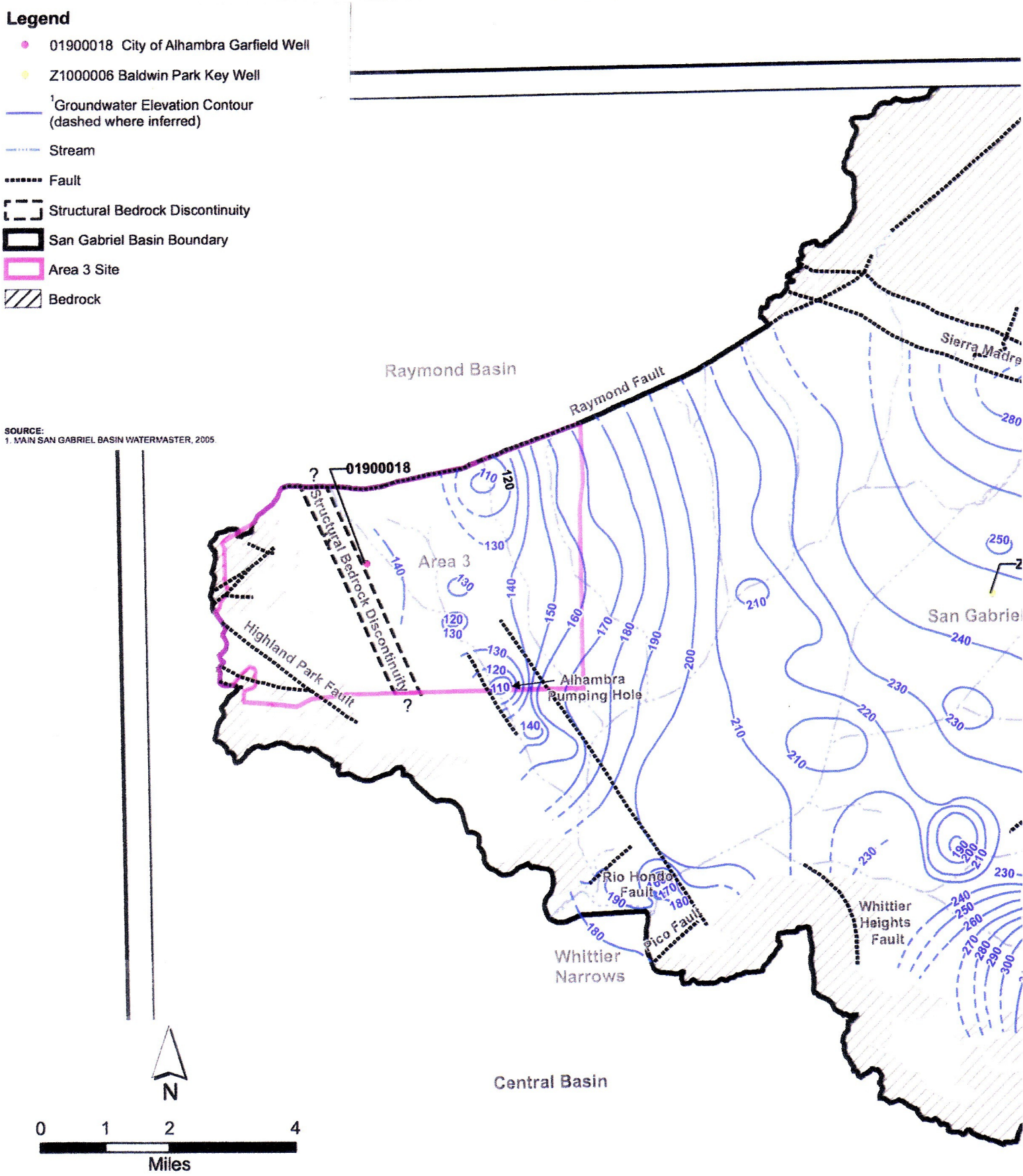


Figure 3-6 (PARTIAL)
Summer 2005 Regional Groundwater Elevation Contours
San Gabriel Valley Area 3
Superfund Site Remedial Investigation

.

received
4/18/11

William D. Sherman, MD

320 Grand Avenue

South Pasadena, CA 91030

April 23, 2011

Ron Kosinski

Deputy Director

Division of Environmental Planning

Caltrans District 7

100 S. Main street, MS 16A

Los Angeles, Ca 90012

Dear Mr. Kosinski,

RE; SR-710 Environmental Impact Report/ Scoping Request.

I am making a request that the EIR/EIS designates the area adjacent to the South Pasadena High School as a "Sensitive Receptor" and perform a "Hot Spot Analysis" and a "Health Impact/Health Risk Assessment" of this same area.

The Parsons-Brinkerhoff Study of 2006 places a Ventilation Tower at the halfway point of the tunnel adjacent to the South Pasadena High School. This tower will be venting tunnel fumes at ambient temperatures or lower. It is probable that this contaminated air will settle next to the High School and adjacent areas.

It is well documented that tunnel and freeway fumes harm developing lung function and induce asthma in children. There are reports of increased cardiovascular disease, autism, and cancer. The particulate matter and noxious gasses cannot be effectively removed from the exhausted air of the tunnel. Ultrafine particles can only be filtered by high quality ventilation systems such as those used in hospital anesthesia machines. These ultrafine particles can permeate the entire body as they are carried within the blood stream.

The safe exclusion of toxic fumes from our environment is an obligation of all public agencies.

Yours truly,

William D. Sherman, MD

William D. Sherman, MD

320 Grand Avenue

South Pasadena, CA 91030

March 21, 2011

Ron Kosinski

Deputy Director

Division of Environmental Planning

Caltrans District 7

100 S. Main street, MS 16A

Los Angeles, Ca 90012

Dear Mr. Kosinski,

RE; SR-710 Environmental Impact Report/ Scoping Request.

I am making a request that the firm hired by Metro/Caltrans to perform the EIR/EIS not be involved in the Design and Build phase of the project.

I and many people in the public have great mistrust in Metro and Caltrans policies and procedures. Many people believe that the scoping and EIR/EIS process are biased towards the tunnel option.

If the firm that completes the EIR/EIS is also going to design and build the project they will be inclined to favor the most costly option, the tunnel. They also will favor what Metro seems to want the most, which is the tunnel.

There must be separation from the firm that performs the EIR/EIS and the final design and build phase of the project.

Yours truly,

William D. Sherman, MD

4-10-2011

FROM - WILLIAM C. DOWNER
31 N. 2ND ST. #A
ALHAMBRA, CA. 91801-6203

received
4/14/11

TO - MR. RONALD KOSINSKI
DEPUTY DISTRICT DIRECTOR
DIVISION OF ENVIRONMENTAL PLANNING
CAL TRANS DISTRICT 7
100 SOUTH MAIN STREET
MAIL STOP 16 A
LOS ANGELES, CALIF. 90012

DEAR MR. RONALD KOSINSKI

PLEASE HELP THE 710 FWY GAP BE EXTENDED TO THE 210 FWY AS SOON AS POSSIBLE.

THANK YOU FOR YOUR HELP

William C. Downer

WILLIAM C. DOWNER

April 9, 2011

Ron Kosinski
Deputy District Director
CALTRANS DISTRICT 7
100 S. Main st
LOS ANGELES, CA 90012

received
4/12/11

Dear Sir,

We oppose the extenssion of the 710 Freeway northward for the following reasons listed below:

There are many other solutions that can be found to alleviate trafic congestion.

I need to know the impact of the following:

- Truck Noise to the surrounding communities?
- Polution impact, due to increased truck trafic, to our children at schools and playgrounds? to clinics and hospitals?
- Costs for the project? Who will pay and guarantee that its impact will not effect communities and tax payers of state of California?
- As an alternative an electric railway system(s) should be considered to move people and goods from collection centers to distribution centers. This would, eliminate, alleviate, noise and polution and trafic congestion.
  utilize existing railways and modify as needed and install new systems as reqid.

Victor Saliamonas
5511 Vista Canada Pl.
LA CANADA, CA 91011

Ron Kosinski/D07/Caltrans/CAGov
04/15/2011 12:34 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: 710 traffic mitigation alternatives for EIR

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:34 PM -----

Val Marquez <dominovm@pacbell.net>
04/14/2011 04:50 PM

To <sr710conversations@metro.net>
cc <ron_kosinski@dot.ca.gov>
Subject 710 traffic mitigation alternatives for EIR

Please submit these comments and enter into the official EIR record.

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

Add two lanes to 710 entering the 10 freeway in each direction. Drivers missing the interchange have to exit Valley Blvd. adding to traffic bogs at Valley Blvd

Create a Hellman Ave. off ramp

Use of electric rail for freight movement from the ports
No build - end 710 at the I-10 Fwy and mitigate traffic on the I-10 Fwy West and East

Two right turn lanes going east on Valley Blvd and one single lane bridge overpass exiting the 710 west bound to Valley Blvd - This lane would be a continuous exit without stoplights that would merge with Valley Blvd - making it easier to get off the 710, relieving the corridor

Valentin Marquez
3118 lowell Ave
Los Angeles, CA 90032

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:34 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: 710 traffic environmental concerns and traffic mitigation alternatives for EIR

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:34 PM -----

Val Marquez <val@valsdesignstudio .com>

04/14/2011 04:47 PM

To <sr710conversations@metro.net>, <ron_kosinski@dot.ca.gov>

cc <ron_kosinski@dot.ca.gov>

Subject 710 traffic environmental concerns and traffic mitigation alternatives for EIR

Please submit these comments and enter into the official EIR record.

Use of electric rail for freight movement from the ports
No build - end 710 at the I-10 Fwy and mitigate traffic on the I-10 Fwy West and East

Two right turn lanes going east on Valley Blvd and one single lane bridge overpass exiting the 710 west bound to Valley Blvd - This lane would be a continuous exit without stoplights that would merge with Valley Blvd - making it easier to get off the 710, relieving the corridor

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

Create a Hellman Ave. off ramp

Add two lanes to 710 entering the 10 freeway in each direction. Drivers missing the interchange have to exit Valley Blvd. adding to traffic bogs at Valley Blvd

Val Marquez
3118 lowell Ave
Los Angeles, CA 90032

①

Mr Ron Kosinski, Deputy Director
Division of Environmental Planning
Caltrans District 7
100 S. Main St, MS 16A
Los Angeles,CA 90012

Trisha Gossett
1842 Phillips Way
Los Angeles, CA
90042

RECEIVED 4/14/11

Dear Sir,

April 14, 2011

In Regards to the 710 scoping process, I am writing to request that the following concerns be included ,in what I am assured will be a complete study, which will of course include Highland Park, Glassell Park, Mount Washington, and Eagle Rock. Thank you in advance for admitting my letter into your file for public review. I look forward to a full and thorough response to my questions.

TUNNELS/ TOLL ROAD

Many stakeholders and taxpayers here in Northeast Los Angeles are expecting a complete and thorough study and description of all 5 tunnel routes- as was promised by former Caltrans District Director Doug Failing, when all of the Geotechnical public meetings.
Will you provide us with information on the length,environmental impacts,seismic issues,pollution,and the adverse impacts etc on nearby neighborhoods, schools, hospitals/ nursing care facilities, etc.?

SAFETY/COSTS

There have been discussions of building 2 tunnel/toll roads-one for cars, and one for trucks.
If there is an accident in a tunnel/toll road, where a semi has overturned, how will you be able to extract it?
What is the strategy for handling an accident? What will the taxpayers be obliged to pay for, upon the event of an accident or crash? Will the collected tolls be put aside for this purpose?
Will this be a public/private /partnership, whereas the tolls collected will be for profit?
If the tunnel/toll road is a PPP, will other countries will be speculating? If so, will you provide this information to the public in a transparent manner?
What is the impact of the output of the pollution emitted from the cleaning towers, should there be a massive crash induced, diesel fueled fire?
How will the disabled, and wheelchair bound be exiting the tunnel/toll road, upon the event of an emergency?
What is the fee schedule for the usage of the tunnel/ freeway? (will you still call it a "free"way? pun intended)

CLEANING TOWERS

We will be expecting lots of information on
1)Locations
2)Size
3)Number of towers needed per tunnel/toll road route

What about the pollution aspect of these towers? What resources will there be to clean some of the exhaust/pollution, and how will gridlock, for instance affect what what gets missed?
Once built, what is the cost, plan, process, and schedule for maintenance of the towers?
Can you tell us what kind of monitoring system will be used for the towers?

WATER / SEISMIC ISSUES

1) It was discussed at the Geological Feasibility study about a year ago, that one of the proposed zones for the toll tunnels would have to cross through the Raymond Basin, as well as the Raymond Fault. What will be the impacts to the water,which is crucial to the city of Pasadena, and is stored in the Raymond Basin?
2) How will the toll tunnel be protected from leaking into the groundwater?
3)What will the study show in relation to the impact to the Raymond Basin, during the boring process, and how a seismic disturbance would impact the water where the toll tunnel is?
4) In regards to the public's concern and safety, how will you address the facts regarding a boring tool of unprecedented size, plowing through 3 earthquake fault lines in one, or more, of the proposed zones?
5) Will you reference the man made disaster from deep water drilling, and now, the man made nuclear disaster in Japan, when you address the public, with regards to the boring process, should you choose to go forward with a toll tunnel?
6) Will you include information on the unprecedented size of the proposed toll tunnels, being sure to make the public aware that they will be the largest in the world?

PUBLIC HEALTH AND SAFETY ISSUES

The Los Angeles Times, and other publications have written numerous stories on the affects of pollution on people, and other living things. Will you use their findings as an unbiased referential tool?
I am requesting a 'hot spot analysis' of the sensitve receptor community sites on the list referred to earlier, which I have provided. These include schools, hospitals, nursing homes.
To these I am adding parks and playgrounds, athletic fields,day care centers, and senior citizen centers. *See attached list

AIR QUALITY ANALYSIS

It is crucial that an entirely new 'air quality analysis' be included in the EIR, since there has not been an update since 1993. The laws, both federal and state, have changed. The pollution

inside the toll tunnels and the cleaning towers **must** be studied and documented.

HISTORIC RESOURCES

The EIR **must** include a completely **NEW** and updated Historic Property inventory of the various proposed 710 routes. It has been over 25 years since the last Caltrans inventory of the then proposed surface route. Besides being reviewed and updated, the inventory should include properties which have now reached the 50 year mark, and are thus deemed eligible for historic status.
An inventory of the other 4 proposed routes will be compiled with the help of the Los Angeles Conservancy. Will you make sure this is done?

ALTERNATIVES

As a taxpayer, and Angelino, I want alternative modes of freight movement and transportation needs of the citizenry addressed and documented in the study. Some of these may include:
1)Multi-mode low build projects
2)Transit options, like the Gold Line, which is genius in my opinion, since it gets cars off the road.
3)Rail for freight from point of entry into the United States.

DETAILED COST ANALYSIS

I want to see a detailed and transparent cost analysis included with the EIR, in regards to a proposed toll tunnel of epic proportions.
Will you use disbanded projects like the Orange County/Riverside toll tunnel as a reference for fiscal responsibility? A toll road in Orange County filed chapter 11 last year. Is this information you may reference?

Sincerely, Trisha Gossett
(323)255-7775

Trisha Gossett
April 14-2011

TRISH KERTES
ORIGINAL OIL PAINTINGS
www.trishkertes.com
tkertes@earthlink.net
818-621-7775

received
4/14/11

Dear Mr. Kosinski,
Re: 710 closure

I want to demand that La Canada be included in the EIR Study immediately!

I want the 710 closure project stopped and for your office to focus on developing a freight rail system to transport goods and supplies.

Respectfully,
Trish Kertes, La Canada resident of 35 years.
Joseph Kertes - husband

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:20 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: SR-710 Gap Closure Project, Scoping Comments

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:20 PM -----

<tonialivingston @roadrunner . com>

04/08/2011 08:14 PM

To <ron_kosinski@dot.ca.gov>

cc

Subject SR-710 Gap Closure Project, Scoping Comments

I would like to have my comments included in the 710 Gap Closure Scoping Comments. My address is 3229 Orilla Ave. Los Angeles, Ca. 90065. I have several concerns regarding the proposed tunnel that would run through Cypress Park, Glassell Park and Eagle Rock. The first is that my understanding of Measure R was to provide more mass transit not create more traffic which could happen because people will by pass the tunnel if it is a toll road, or they feel it is a hazard due to possible fire. The tunnel would create more polution and will affect the long term health of our residents. We should be looking at alternatives such as more rail from the ports to truck transportation connecting points. Tunnels are expensive and we could be using this money for light rails.

--

Toni Livingston
Keller Williams World Media Center
Burbank, CA 91502
323-253-3090 Cell
DRE #01511831

MR. TERRY BEYER
2230 RICHEY DR.
LA CANADA, CA 91011

RON KOSINSKI
DEPUTY DIST. DIR
CALTRANS DIST. 7
100 S. MAIN ST.
L.A., CA 90012.

received 4/12/11

APRIL 8, 2011

RE: 710 FWY EXTENSION – PUBLIC INPUT

I WISH TO STATE THAT I AM OPPOSED TO THE EXTENTION OF 710 FREEWAY BY ANY OF THE MEANS SO FAR PROPOSED. I AM CONVINCED THAT ALLOWING LARGE TRUCKS TO USE 710 EXTN. TO CONNECT TO 210 FWY. WILL NEGATIVELY IMPACT MY COMMUNITY BY INCREASED TRUCK TRAFFIC. I AM ESPECIALLY OPPOSED TO A TUNNEL DUE TO ADDITIONAL UNDERESTIMATED COSTS INVOLVED AS WELL AS SEISMIC DANGERS ENTAILED.

I WOULD PREFER TO HAVE AVAILABLE PUBLIC TRANSPORTATION IMPROVMENT FUNDS APPLIED TO MASS TRANSIT INFRASTRUCTURE IMPROVMENTS: SPECIFICALLY IN AREAS OF LONG BEACH AND L.A. PORTS ACCESS BY TRUCKS AND COMMUTER TRAFFIC, AS WELL AS ROUTES CONNECTING ALL-THE-WAY TO L.A.X. (METRO RAIL, ETC.) RATHER THAN STOPPING SHORT. SHIFTING TRAFFIC OF CONTAINER GOODS BACK TO RAIL TRANSPORT WOULD RELIEVE THE PRESSURE TO PUT MORE TRUCKS ON ALL THE CROWDED FREEWAYS AND SURFACE ROUTES.

YOURS SINCERELY,
Terry Beyer

(818) 248-4890

April 13, 2011

Ron Kosinski
CALTRANS District 7
100 South Main Street, MS-16A
Los Angeles, CA 90012

RECEIVED 4/14/11

Re: SR-710 North Gap Closure Project Scoping

Dear Mr. Kosinski:

Please enter the following information into the official scoping/EIR/EIS document for the tunnel extension project.

As a Foothill resident of the past fifty years, I have enjoyed the small town lifestyle that I am afforded by living in the Crescenta Valley. I have seen many changes in transportation during this time including the original construction of the I-210 freeway, the opening of the portion between Sunland and Tujunga and most recently the opening of the last portion near San Dimas. When the last part occurred about 5-10 years ago, long time residents like me noticed a huge change in the regular traffic pattern on the freeway. For the first time ever, we had bumper to bumper traffic and noise in our neighborhood with a huge increase in truck traffic. The result of this change was an exponential increase in fatal accidents involving big rig trucks.

A recent analysis by the City of La Canada, revealed that if the SR-710 North Extension is built, the I-210 would see an increase of 30,000 vehicles per day, 850 trucks per hour. The freeway would open at a grade level "F", meaning gridlock. **This is unacceptable**. The result of this burden of traffic on the I-210 would cause vehicles to spill off and clog our one main artery, Foothill Boulevard, the only link across the Valley to points east and west. There are no alternative roads. None.

The additional vehicle traffic would also result in high increases in air pollutants and noise, directly near hundreds of schools and daycare facilities, recreational programs, golf courses parks and pools, Descanso Gardens, hospitals, equestrian centers, outdoor festivals and malls and so much more.

Caltrans and Metro **must** change course here and do the right thing for quality of life and to improve all regional transportation.

I demand that the study area for the SR-710 North Gap Closure be expanded to include all cities along the I-210 and points west including but not limited to: San Fernando, Pacoima, Sylmar, Lake View Terrace, Sunland, Tujunga, Glendale, Verdugo City, La Crescenta, La Canada and Flintridge.

I insist that the study area also be expanded to include all cities along the SR-2 freeway north and south including but not limited to: Montrose, Glendale, Eagle Rock, Atwater Village, Highland Park, Glassell Park, and Mt. Washington

The studies for these areas must be conducted by unbiased independent researchers who will use scientific methodology and statistical analysis to reach their conclusions. Areas of study include but are not limited to Health Impact and Hot Spots Analyses and Traffic Pattern Analyses with estimates of average commuter time, with the project completed and without it. Include a Foohill-specific plan from Pasadena to Sylmar showing traffic impacts and spill-off trends with accurate vehicle estimates if the freeway is shut down or clogged..

Thank you in advance for incorporating these actions into the EIR/EIS process.

Sincerely,

Susan Bolan
3528 Prospect Avenue
La Crescenta (North Glendale), CA 91214

received 4/8/11

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street Mail Stop 16A
Los Angeles, CA 90012

Dear Mr. Kosinski,

RE: SUPPORT FOR THE 710N GAP CLOSURE PROJECT AND COMMENTS FOR ENVIRONMENTAL REVIEW

This writing is being sent to you so we can be on the record on the 710N Gap Closure project. We support a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed NOW.

Please include the following in the environmental analyses:

- The Gap has been in existence for nearly 40 years creating much confusion for drivers; let's fix this! The EIR should show how all freeways and major roads in the area in four directions will benefit from the closing of the gap.
- Air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved; the EIR should demonstrate both of these aspects to show actual project benefits.
- Our commutes will be easier and take less time to go to work and come home; the EIR should take into account how closing the gap improves the quality of life for many people.
- Jobs will be created during these tough economic times; the EIR should detail how the project helps our economy in creating jobs and in other ways such as the benefit to the tourism industry; for example, visitors to Los Angeles will actually be able to reach their destination when using the 710N freeway instead of being routed off through local communities.

Please continue the environmental process with all due speed. Remember we voted, along with 2/3 of all Los Angeles County voters, for Measure "R" that calls for the 710N Freeway to be completed.

We cannot wait another 40 years for this project to become a reality.

Sincerely, 4-6-11

Steve Jacek
2039 S. Sixth St.
Alhambra, CA 91803

Stephanie Johnson
1920 Los Robles Avenue
San Marino, California 91108
626-441-8514
stephjohnson17@hotmail.com

April 9, 2011

RECEIVED 4/14/11

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main Street, MS16A
Los Angeles, California 90012

Re: The 710 Gap Closure Project
(PM 26.7/32.1, EA/Proj.ID: 187900/0700000191 710 Gap Closure)
Scoping for Environmental Impact Study

Thank you for the opportunity to comment on scope of the Environmental Impact Report for the 710 Gap Closure project. I have attended the *SR-710 Conversations* community meetings conducted by Caltrans and METRO.

Given the broad project definition, (*all possible transportation improvements - to relieve congestion and improve mobility)* my comments are limited to current conditions and the need for mitigation of existing and potential negative impacts to Los Robles Avenue in San Marino; the street where I live.

Los Robles Avenue in San Marino is a 7/8 of a mile narrow, two lane street fronted by single family homes where children live and play. The street runs from Huntington Drive, where Atlantic Boulevard terminates, to the City of San Marino's northern border at the intersection of Los Robles and Marengo avenues in Pasadena. The homes, built in the 1920s, are situated close to the street, since Los Robles has been widened from its original configuration. The posted speed limit is 30 mph. and commercial vehicles over three tons are prohibited. The City of San Marino General Plan, classifies Los Robles Avenue as a residential collector street. The street carries an unusually high volume of cut-through traffic, exceeding the capacity of a two lane residential street.

Sample photos of Los Robles Avenue, non-peak hours

Are these the types of accidents that typically occur on a residential street?

Sample photos of Los Robles – peak hours

Note: night photo – signal light is green, and traffic is still backed up.

According to project materials, the proposed Purpose and Need for the Project includes: "Reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips." Los Robles is one of those streets.

- Los Robles Avenue has been defined as a collector street with a design capacity of 10,400 ADT. The existing traffic volume approaches 18,000 ADT, which regularly exceeds the level of service "E" design conditions (13,000 ADT).

- Traffic congestion during commute hours is so bad that residents cannot back out of their driveway. The speed of traffic, especially during late night hours is excessive. There are many traffic accidents due to the high traffic volume.

- The EIR for the Alhambra *West Main Street Corridor Master Plan* project studied the signalized intersections in the city of Alhambra. The intersection adjacent to Los Robles Avenue is Atlantic & Huntington Drive. The level of service during commute time is rated "F".

- The existing noise level on Los Robles Avenue exceeds the city of San Marino guidelines. The residential area along Los Robles Avenue has been documented to be exposed to noise levels as high as 72 dB(A) by two independent studies, that place the existing residential use in the "normally unacceptable" category and clearly define it as impacted by traffic noise.

- Traffic generated air pollution and air quality, to my knowledge, has never been evaluated.

- Clearly, excessive traffic in a residential neighborhood presents numerous public safety issues and is a constant public nuisance.

- Many of the homes on Los Robles were built in the 1920s. They have historic value due to their age and several of the homes are considered to be architecturally significant.

Past projects in neighboring cities have negatively impacted our street, increasing traffic volume and exacerbating the noise, air pollution, and public safety problems. Projects now in progress have the potential to adversely impact Los Robles further.

- A prior city of Alhambra project closed three streets at Huntington Drive and diverted the traffic to Atlantic/Los Robles. The EIR for the *Almansor Street Traffic Diversion Project* (April 1993), indicates that traffic was deliberately shifted away from the nearby Alhambra residential area onto both Garfield and Atlantic boulevards. The EIR concludes that the traffic diversion would increase traffic on Los Robles Avenue, and it has.

- Subsequently, the city of Alhambra has approved the In-n-Out Burger establishment at Atlantic & Garfield, the cinema complex at Garfield & Main, and the West Main Street Corridor project, all of which generate cut-through traffic on Los Robles Avenue. Furthermore, the northbound Atlantic Boulevard lane striping has been changed since the In-n-Out project from one northbound to Los Robles, to two northbound lanes, allowing more traffic onto Los Robles.

- In 1998, $46 million in Federal Transportation Funds was secured to assist the cities of South Pasadena, Pasadena, and Los Angeles to alleviate traffic congestion. None of the work completed has included a study of the traffic impacts to Los Robles Avenue in San Marino.

- Growth in Pasadena from increased housing density, entertainment at Old Town, shopping at Paseo Colorado and Lake Avenue, and an increase in the number of businesses, have generated more traffic to western Pasadena. I am not aware of an environmental study of the impacts to Los Robles Avenue in San Marino completed for any project.

- South Pasadena is currently implementing improvements to the Fair Oaks corridor including traffic calming features and signal synchronization. Plans for traffic calming on Fremont Avenue have been approved, but not implemented. None of these projects have assessed the impact to Los Robles Avenue.

- The current traffic Signal Synchronization project underway by the County of Los Angeles includes the synchronization of traffic signals on Atlantic Boulevard to <u>increase traffic flow</u>. This project was declared categorically exempt from environmental review.

- An ATMS project is underway by the County of Los Angeles – San Gabriel Valley Traffic Signal Forum that designates Atlantic Boulevard a "priority corridor" (major traffic conduit). The stated purpose of the ATMS project is to <u>increase traffic flow</u>. This project was declared categorically exempt from environmental review.

For those of us who live on Los Robles Avenue in San Marino, a study of the environmental impacts of traffic is long overdue.

Since Los Robles Avenue has already been negatively impacted by excessive traffic, a plan to mitigate the negative impacts must be developed and implemented as part of a regional mobility plan. It is wrong to allow a residential street to decline into a cut-through "freeway".

I appreciate that the goal of Caltrans and METRO regional planning is to provide the best public transportation possible to the residents of Los Angeles County, while mitigating the adverse effects to the environment and the people who live here and trust that an environmental impacts study and report for our area will be forthcoming.

Sincerely,

Stephanie Johnson

received
4/18/11

Stephanie Ryan
4806 Glenwood Ave
La Crescenta, CA
91214

Ron Kosinski
Deputy Director
Caltrans District 7
100 S. Main St.
Los Angeles, CA 90012

4-4-2011

Regarding: Stop the proposed 710 tunnel

Dear Ron Kosinski,

Please stop pursuing the 710 tunnel and support other projects.

-The concept of the 710 tunnel extension is outdated; a modern master plan is needed for greater Los Angeles
-Effective rail from the ports is the better solution from both a business and environmental standpoint. It is also a better solution for the Southern California transportation system and the people that use it.
-The billions of dollars for the proposed tunnel would be better used funding other more beneficial projects to help this state, plus generate better returns on investment and make the U.S. more competitive globally.
-The same construction contractor and business could make money with other more beneficial projects.
-The proposed tunnel would dramatically increase truck traffic and harm our children from toxic diesel truck pollution. In particular, the 210 highway sits a few feet from at least two high schools and would become the main truck thoroughfare north. It is well documented that truck particulate and highway related pollution has a terrible effect on the lungs of our youth and increases health problems for us all. Please reference Multiple Air Toxics Exposure Study (MATES III) research and John Froines Ph.D. UCLA Director of Center for Occupational and Environmental Health comments in LAParent Dec 2010.

Thank you,

Stephanie Ryan

April 7, 2011

RECEIVED 4/14/11

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

Dear Mr. Kosinski,

Completion of the 710 Freeway will no doubt alleviate congestion in Alhambra, Monterey Park, South Pasadena, Pasadena, and Los Angeles, but it will also ease congestion throughout the entire basin as traffic routes get eased with this new roadway. The spillover effect is enormous!

Also, in the directly impacted communities, you will also see decreased pollution, decreased fatalities, and decreased hours travelled, which translates to billions of dollars of savings regionally.

This project is 40 years overdue and needed for the next 100 years on top of that. The time is now!

Sincerely,

Sheila Khoo

SHEILA KHOO

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:20 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: SR-710 North Gap Closure Scoping Comments

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:20 PM -----

Sharon Hales <halesclan5@gmail.com>

04/08/2011 04:59 PM

To <ron_kosinski@dot.ca.gov>, <garrett.damrath@dot.ca.gov>

cc Sharon Hales <halesclan5@gmail.com>, Kendall Hales <kendall@kendallhales.com>

Subject SR-710 North Gap Closure Scoping Comments

To Whom it May Concern:

I wish to request that the following considerations be taken into account regarding the proposed 710 North Gap Closure:

1**. Significant Impacts: Air Quality** The 710 Gap Closure Project would increase vehicle miles travelled. It would also increase carbon emissions, potential traffic congestion on either end of the tunnels on the 10, 710, 110, 134 and 210 Freeways and would likely massively increase truck traffic on I-210 between Pasadena and San Fernando due to the convenient new connection between the ports and I-5 north. Diminished air quality would impact surrounding communities along the 210 freeway, especially the numerous schools, parks, golf courses and other recreational centers where our children spend much of their days in the outdoors. Increased traffic along I-210 will compromise the quality of life for the surrounding neighborhoods, and for natural wildlife habitat.

Alternatives:
a. MultiMode Improved freeway ramp access from Foothill and LaTunaCanyon.
b. Freight on Rails - Improve Alameda Corridor and UP/BNSF thru SFValley to Palmdale
c. Fix Transit Gaps - GoldLine West extension and Rosemead/SR19 GoldLine-BlueLine connector
d. Truck ban on I-210 due to road grades in excess of 2% - 710>134>I5

Further, there should be a HotSpot APollution analyses and Health Impact Assessments for any school or important public area within 500ft of the I-210.

2. **Significant Impacts: Noise, traffic lights at night, traffic congestion along I-210**

Mitigation: Soundwalls and light barriers; engine braking prohibitions with sound monitors and camera; truck scrubbers to equal or be below existing AP levels.

Comment: As we look to a future in which we want to be less reliant on expensive fossil fuels and more conscious of the environment, it is absurd to encourage the transportation of goods via trucks. Our government should be exploring transportation options that are GOOD FOR THE COMMUNITIES they serve instead of suggesting one that is horrendously expensive and will completely compromise our quality of life.

Respectfully submitted by,

Sharon Hales
Kendall Hales
2305 Panorama Dr.
La Crescenta, CA 91214
(818)249-5572

12 April 2011

RECEIVED 4/14/11

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main St., MS 16A
Los Angeles, CA. 90012

Re: Comments on Scoping (So called 710 "Gap Closure" Project)

Dear Mr. Kosinski:

Thank you for allowing me the opportunity to comment upon the scope of the EIR/EIS on the SR 710 Freeway Extension (sometimes erroneously referred to as the "710 Gap Closure").

The significance and concerns of the impacts of vehicular pollutants released into the atmosphere from proposed portals and ventilation stacks and which exceed accepted standards and thresholds of both NAAQS and SCAQMD are discussed in Chapter 8.4.2 (pages 109-110) of the Parsons Brinkerhoff Report (June 7, 2006):

"If air pollutant levels were found to exceed these standards and thresholds, then the following potential mitigation measures would be considered:"

- **"Raising the height of the ventilation shafts to increase atmospheric dispersion."**
- **"Relocate ventilation shafts away from areas of sensitive land use."**
- **"Revise the ventilation system to minimize the discharge at the portals."**
- **"Modify the ventilation system at the portals to increase dispersion."**

The four potential mitigation measures listed are not realistic or are inadequate. These measures can only be implemented after construction is complete and the tunnel is fully operational. It is therefore necessary they be shown as viable solutions in reducing pollutants below levels of significance during the EIR/ EIS process.

Point 1: *"Raising the height of the ventilation shafts to increase atmospheric dispersion."*

To what height? A detailed analysis of the various potential heights needed, "...to increase atmospheric dispersion", must be given. This analysis must include the maximum shaft height allowed by law and the maximum extension in height possible while still maintaining the structural integrity of the ventilation shafts.

Point 2: *"Relocate ventilation shafts away from areas of sensitive land use."*

To where? This is an unrealistic proposal. A definition of, "sensitive land use", is needed. This definition must clearly state if residential, commercial and public lands are considered equally sensitive. All potential sites for ventilation shaft relocation must be identified and the effectiveness of relocating these shafts so as to reduce vehicular pollutants to below levels of significance must be studied and proven. The maximum distance a ventilation shaft can be placed away from the tunnel and remain effective must be shown.

Point 3: *"Revise the ventilation system to minimize the discharge at the portals."*
Point 4: *"Modify the ventilation system at the portals to increase dispersion."*

The terms "revise" and "modify" have not been defined. Defining these terms in clear and unambiguous language is necessary prior to accepting them as potential mitigation measures. Evidence must be provided as to how these revisions or modifications will be effective in bringing vehicular air pollutant emissions to below significant impact levels.

After study or analysis, if these mitigation measures prove impractical or inadequate, other potential mitigation measures must be thoroughly vetted during the EIR/EIS process.

Sincerely,

Sam Burgess
626 Prospect Ave. #B
South Pasadena, CA. 91030
626-441-1205

samburgess@sbcglobal.net

12 April 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main St., MS 16A
Los Angeles, CA. 90012

Re: Comments on Scoping (So called 710 "Gap Closure" Project)

Dear Mr. Kosinski:

Thank you for allowing me the opportunity to comment upon the scope of the EIR/EIS on the SR 710 Freeway Extension (sometimes erroneously referred to as the "710 Gap Closure").

The statement below is the same as my verbal statement made on 6 April of this year during the SR-710 Conversations held at Ramona Hall in North-East Los Angeles.

"The EIR/EIS must analyze and provide justification that indeed the South 710 and North 710 Projects are separate, not inter-related and that one does not impact the other."

"A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole". (*Orinda V. Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1171.)

Sincerely,

Sam Burgess
626 Prospect Ave. #B
South Pasadena, CA. 91030
626-441-1205

samburgess@sbcglobal.net

440 Pilgrim Pl
San Marino, CA 91108
4/12/11

Dept of Transportation
District 7, Div of Environmental Plng
100 So Main St MS 16A
Los Angeles, CA 90012

received
4/14/11

RE 710 Gap Closure

Dear Sir or Madam:

The Cul de sac on which I live exits onto Los Robles, A 2way street that has been turned into a main highway by the intransigence of the City of So Pasadena relative to the 710 Gap. The delay in trying to exit onto Los Robles with it carrying over 20,000 vehicles per day can sometime be several minutes as one tries to find an opening in traffic, notwithstanding the unnecessary polution generated.

May I urge you to use all resources at your command to thoroughly study the impact of the 710 Gap & hopefully Alleviate the situation. If So Pasadena desires to live with wall to wall cars that is their privilege but they shouldn't be allowed to cause such havoc on their neighbors.

Very truly yours

R. L. Spies

Ron Kosinski/D07/Caltrans/CAGov
04/15/2011 12:21 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: 710 Freeway

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:21 PM -----

Rick Nathanson <ricknath777@gmail.com>
04/09/2011 10:26 AM

To <Ron_Kosinski@dot.ca.gov>, <SR710Conversations@metro.net>
cc
Subject 710 Freeway

April 9, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans – District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

Dear Mr. Kosinski,

As a longtime resident of La Crescenta, my wife and I have seen many changes to our community, County and State. Some of them have been good changes and others of them not so good.

Sometimes we have worked hard to have changes made and been delighted when the changes went our way. Other times we have lost the debate and learned to live with the results of our defeat.

Now we are set upon a mission, the proposed change of which is on a greater scale than ever before. We who live here and along the corridor of the proposed 210 Freeway extension, the very residents who will be most greatly affected, cannot bear the burden of a decision not in our favor.

The rumbling noise of increased traffic, the acrid fragrance of the diesel exhaust, the additional volume of particulates, all of which show up at our doorstep 24 hours per day, can only multiply in their insidious way by allowing the 210 Freeway extension to proceed.

Increasing the flow of traffic and of “big rigs” in particular, through the East / West 210 Freeway corridor will seem like a death sentence to all of us who live here. Physically,

mentally and financially this is the wrong idea for our schools along this route, our communities and our State and Federal budgets, as well.

I am shocked to learn that the communities of La Canada / Flintridge, La Crescenta, Tujunga and Sunland have not been included in the impact studies which have been occurring with regard to this proposed extension. If these communities are not included immediately, we will have no opportunity to fairly voice our concerns, and that is just not fair OR American.

It is my understanding that the proponents of this extension do not live here. We do, you and I.
I trust in you to lead this in the right direction.

Please contact me if there is some way I can be of service to you or our mission to curtail this extension.

Sincerely,

Rick Nathanson
2849 Harmony Place
La Crescenta, CA 91214

* *

Rick **N**athanson
Mobile: +818 / 359-3092
Home: +818 / 957-1701
* *

Ron Kosinski/D07/Caltrans/CAGov
04/15/2011 12:19 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: 710 Fwy Extension

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:19 PM -----

Rick Nathanson <ricknath777@gmail.com>
04/07/2011 01:03 PM

To <Ron_Kosinski@dot.ca.gov>, <sr710conversations@metro.net>
cc
Subject 710 Fwy Extension

April 7, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans – District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

Dear Mr. Kosinski,

As a longtime resident of La Crescenta, my wife and I have seen many changes to our community, County and State. Some of them have been good changes and others of them not so good.

Sometimes we have worked hard to have changes made and been delighted when the changes went our way. Other times we have lost the debate and learned to live with the results of our defeat.

Now we are set upon a mission, the proposed change of which is on a greater scale than ever before. We who live here and along the corridor of the proposed 210 Freeway extension, the very

residents who will be most greatly affected, cannot bear the burden of a decision not in our favor.

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Increasing the flow of traffic and of "big rigs" in particular, through the East / West 210 Freeway corridor will seem like a death sentence to all of us who live here. Physically, mentally and financially this is the wrong idea for our schools along this route, our communities and our State and Federal budgets, as well.

I am shocked to learn that the communities of La Canada / Flintridge, La Crescenta, Tujunga and Sunland have not been included in the impact studies which have been occurring with regard to this proposed extension. If these communities are not included immediately, we will have no opportunity to fairly voice our concerns, and that is just not fair OR American.

It is my understanding that the proponents of this extension do not live here. We do, you and I.

I trust in you to lead this in the right direction.

Please contact me if there is some way I can be of service to you or our mission to curtail this extension.

Sincerely,

Rick Nathanson

* *

Rick **N**athanson

Mobile: +818 / 359-3092
Home: +818 / 957-1701
* * * * * * * * * * * * * * * * * * * *

RICK NATHANSON

April 7, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans – District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

received 4/12/11

Dear Mr. Kosinski,

As a longtime resident of La Crescenta, my wife and I have seen many changes to our community, County and State. Some of them have been good changes and others of them not so good.

Sometimes we have worked hard to have changes made and been delighted when the changes went our way. Other times we have lost the debate and learned to live with the results of our defeat.

Now we are set upon a mission, the proposed change of which is on a greater scale than ever before. We who live here and along the corridor of the proposed 210 Freeway extension, the very residents who will be most greatly affected, cannot bear the burden of a decision not in our favor.

The rumbling noise of increased traffic, the acrid fragrance of the diesel exhaust, the additional volume of particulates, all of which show up at our doorstep 24 hours per day, can only multiply in their insidious way by allowing the 210 Freeway extension to proceed.

Increasing the flow of traffic and of "big rigs" in particular, through the East / West 210 Freeway corridor will seem like a death sentence to all of us who live here. Physically, mentally and financially this is the wrong idea for our schools along this route, our communities and our State and Federal budgets, as well.

I am shocked to learn that the communities of La Canada / Flintridge, La Crescenta, Tujunga and Sunland have not been included in the impact studies which have been occurring with regard to this proposed extension. If these communities are not included immediately, we will have no opportunity to fairly voice our concerns, and that is just not fair OR American.

It is my understanding that the proponents of this extension do not live here. We do, you and I.
I trust in you to lead this in the right direction.

Please contact me if there is some way I can be of service to you or our mission to curtail this extension.

Sincerely,

Rick Nathanson

2849 HARMONY PLACE LA CRESCENTA, CA. 91214
TEL: (818) 957-1701

Peter Rowan
4806 Glenwood Ave
La Crescenta, CA
91214

Ron Kosinski
Deputy Director
Caltrans District 7
100 S. Main St.
Los Angeles, CA 90012

received
4/14/11

4-4-2011

Regarding: Stop pursuing the proposed 710 tunnel

Ron Kosinski,

-The concept of the 710 tunnel extension is outdated; a modern master plan is needed for greater Los Angeles
-Effective rail from the ports is the better solution from both a business and environmental standpoint. It is also a better solution for the Southern California transportation system and the people that use it.
-The billions of dollars for the proposed tunnel would be better used funding other more beneficial projects to help this state, plus generate better returns on investment and make the U.S. more competitive globally.
-The same construction contractor and business could make money with other more beneficial projects.
-The proposed tunnel would dramatically increase truck traffic and harm our children from toxic diesel truck pollution. In particular, the 210 highway sits a few feet from at least two high schools and would become the main truck thoroughfare north. It is well documented that truck particulate and highway related pollution has a terrible effect on the lungs of our youth and increases health problems for us all. Please reference Multiple Air Toxics Exposure Study (MATES III) research and John Froines Ph.D. UCLA Director of Center for Occupational and Environmental Health comments in LAParent Dec 2010.

Please stop pursuing the 710 tunnel and support other projects.

If you need support for other projects, e.g. rail, please let me know.

Thank you,

Peter Rowan
Businessman and Citizen of Southern California

Peter A. Orona
5472 Allan St.
Los Angeles, CA 90031
March 27, 2011

SR 710 Conversations/OFFICIAL SCOPING/EIR
QUESTIONS/COMMENTS/CONCERNS
ONE GATEWAY PLAZA
LOS ANGELES, CA 90012

The proposed 710 Tunnel raises serious moral questions about public/private transportation issues. We did not choose to live near a freeway, connector road, or tunnel. Currently, productive residents living within the Meridian Corridor do so without any complex technologies adding to our health risks. For children, it brings an increased risk of asthma, according to researchers at the Keck School of Medicine of the University of Southern California. "It's one of a host of breathing problems that can plague teens living and learning near L.A.'s vast network of freeways – and these problems can follow them throughout life. With traffic cris-crossing into every corner of SoCal, few families in any part of town are immune to the risk (LA Parent March 15, 2011 Issue) http://www.reportingonhealth.org/feliowships/projects/air-teenage-lungs-1 ." Freeway pollution and noise increase the risk of developing asthma, cancer, hearing loss, and stress related diseases. Those of us who live in this neighborhood can only look forward to a future filled with illness.
Today there is no 710 Surface Freeway Route, Valley Blvd.-Alhambra Connector Road, or 710 Tunnel; consequently, the risk emanating from such concepts are zero. To all Federal, State, County, and Local governments who profess accountability when maintaining modern commercial productivity, it is your duty to find a balance between an individual's right to exist, and urbanization. Anything short of this is a travesty to the democratic process, and an abatement of our humanity. As elected officials, it is your responsibility in making sure that our communities are not abused. Our communities are holding you accountable. As honorable civil servants of our communities, we respectfully request the following items be addressed rigorously, competently, and judiciously.

1. What would it take to construct the southern portal between the 60 Frwy (Pomona), and the 10 Frwy (San Bernardino)? Can Freeway Interchanges be reconfigured? If yes, then would it be possible for the southern portal to begin just before the 10 Frwy. Can a tunnel be constructed to go underneath the San Bernardino Frwy?

2. In regards to Electrostatic precipitators (ESP), or Electrostatic air cleaners: What data is there on the effectiveness of ESP/Scrubbers on ambient outside air? Are there a list of contaminants that scrubbers will remove and a list that the scrubbers will not remove? Which companies will be contracted to build the ESP's? Japan uses removal technologies in high-density areas, what is going to be done in El Sereno? What kind of containment tunnel management will be used; "dispersion containment", or removal containment"? How many tons of waste will a "scrubber tower" hold prior to maintenance? Can a "scrubber tower" implode? If a "scrubber tower" fails or is destroyed, is there a back-up system, or replacement procedure in place? Where is the waste from the scrubber pollution going? Can the same, or better "scrubber" technology utilized in nuclear submarines and spacecraft be applied to 710 Tunnel Scrubber Towers? How will 710 Tunnel Environmental Authorities continuously regulate/monitor the atmospheric conditions inside and outside the tunnel region? As scrubber technology improves, can scrubber towers be upgraded?
3. Provide information on studies done to measure simultaneously Particulate Matter contamination emanating at both portals (i.e., same weather/seasons/day/hour). How will the Air Quality Descriptor for PM 2.5 and PM10 be articulated in relation to the 710 Tunnel? Will PM 2.5 and PM 10 particles be eliminated in the process of being scrubbed? What contaminants will be left over and breathed by citizens? Where will the tunnel portals begin? Allen? Concord? Valley Blvd.? Del Mar? How will mitigation measures be addressed at the portal entrances, and tower sites when the technology to control pollution is not proven, or does not exist? How much toxins/noxious gases/CO2/PM2.5/PM10 particles will cars and trucks release inside the 710 Tunnel per hour? Please provide low and high estimates. Will authorities shut down the tunnel when too many hazardous PM2.5 and PM10 particles are detected on any given day? How much smog will the 710 Tunnel's portals, and scrubber towers contribute to the local existing pollution? For example, how will this new source of smog affect the smog inversions that the communities of La Canada/Flintridge/Tujunga experience? How many tons of air pollution will the proposed scrubbers capture? How often will the proposed scrubbers need to be cleaned? Provide low and high estimates.
4. How would authorities mitigate the noise pollution during the construction of the 710 Tunnel? How will you recapture, and recycle water from any tunnel excavation encounters? Will authorities monitor noise levels, and pollution levels during construction? If levels exceed allowed limits, or the community's concern will they halt work for the day?
5. How will the Valley Blvd.-Alhambra Ave. Connector Road (part of the Low-Multi-Build Alternatives) benefit El Sereno? Compare and contrast the efficiency and effectiveness between the Valley Blvd.-Alhambra Ave. Connector Road, a

710 Surface Freeway Route, and the 710 Tunnel. Provide all information on any and all environmental studies, or reports that have been done and completed near, and around the proposed 710 Tunnel. Indicate what efforts have been made to provide this information to the community of El Sereno. Provide any tangent plans that are being considered in conjunction to the 710 Tunnel in order to mitigate LA County traffic problems. For example, will a commuter train station be constructed in El Sereno between Alhambra Ave., and Valley Blvd.?

6. What formulas/strategies are being used to measure risk acceptability in relation to the 710 Tunnel? Provide all information on how safety, and risk assessments of the proposed 710 Tunnel figure into human and environmental degradation within the affected local communities? How many additional lives will be lost prematurely due to the 710 Tunnel pollution and traffic accidents? What are all the cost-benefit ratios? Is the risk of implementing the 710 Tunnel not greater than the level of pollution output currently used in modes of transportation?

7. Provide a number estimate of traffic that will move from the beginning southern part of the proposed 710 Tunnel to the exit in Pasadena. The number should include projected number of cars, commercial trucks, and other vehicles. Will truck traffic in the tunnel be limited? What will be the vehicle capacity for the 710 Tunnel? How many cars would be able to fit within the 710 Tunnel during bumper-to-bumper traffic? Approximately, how many trucks will fit inside the 710 Tunnel? What kind of hazardous materials will be allowed to travel through the 710 Tunnel? For example, will commercial trucks be allowed to carry tankers with acids and flammable liquids through the 710 Tunnel?

8. Describe the potential biohazards that both tunnel construction, and usage bring. How is the construction company going to prevent Valley Fever from affecting people when digging, and clearing soil debris? Will there be limited hours of construction? What are the current local industry's hazardous emissions around the proposed 710 Tunnel? How can these materials interact with the new air pollution that the 710 Tunnel will bring? How will they mitigate truck pollution during construction? For example, will pavements be used during tunnel construction to prevent excess dust? Where will all the trucks for hauling out debris be parked? How many trucks will be used to haul away dirt? Where will the excavated dirt be dumped? Again, can the dirt contain Valley Fever materials? Will the train system be used to haul out construction debris? How do authorities intend to mitigate, or address the noise problem caused by the train during the day, and night?

9. How will the 710 Tunnel benefit the community of El Sereno? How many scrubber towers will be located in El Sereno, and what will be their locations? How many Construction staging areas will be located in El Sereno, and what are the locations of the staging areas?

10. How will a fire inside the 710 Tunnel be mitigated? Where there is fire there is smoke. How will untested scrubber towers filter all the hazardous smoke from inside a 710 Tunnel fire? Will the toxic smoke be allowed to escape through the scrubber towers, vents, emergency exits, and portals? Should fire-fighting foam be used to combat fire inside the tunnel? Can powerful fans be used to redirect the smoke above ground? Will there be double jeopardy during a fire? What kind of endangerment will inhabitants above ground face during a catastrophic fire within the 710 Tunnel? Will there be a sprinkler system installed inside the 710 Tunnel in order to mitigate fires?
11. Will homeowners who live directly over/adjacent to the 710 Tunnel have to relinquish their mineral rights?

12. Can Caltrans buy/build two tunnel boring machines? Having the boring machines simultaneously working at both ends could cut tunnel construction time in half. Why can't the boring machines be designed, and built by Americans within the United States?
13. After tunnel construction and cost, how many years will it take to break even? When will Los Angeles County start making its profits?
14. Will authorities compensate the community, and individuals for any illnesses related to PM2.5 and PM10 particles that would have originated from the 710 Tunnel site? Will they be given health insurance, or monetary benefits?
15. Will MTA provide medical experts to begin a comprehensive health study around the local communities that will be affected by the 710 Tunnel? Will an unbiased environmental overseer be hired to protect, and monitor the community's health and safety concerns during, and after construction?
16. What kind of security will merit monitoring the entire 710 Tunnel facilities? How will terrorist concerns be addressed? What will be done to safeguard the occupants in, and around the 710 Tunnel?
17. How much green space will be needed to offset the pollution that will be generated by the 710 Tunnel? How many fully mature trees will be needed to absorb vehicle exhaust emanating from both the portals, and scrubber towers?
18. How much will a toll road system cost to implement, and maintain?
19. Are current modes of production changing to prevent the harmful effects of pollution? Provide information that the Market Place will create alternative-affordable modes of transportation, and fuels by the time the 710 Tunnel is completed? For example, when will Fuel Cell Vehicles (FCV's) be readily available on a mass transit scale?
20. Will the 710 Tunnel engineers learn from all the errors that previous tunnel mishaps demonstrate? For example, people living around tunnel portals in Australia are suffering, and dying. The Big Dig in Boston is a fiasco. Will an independent panel of environmental experts review the 710 Tunnel EIR? Will a contact telephone number for all agencies, and government officials be provided

to voice concerns and complaints during construction?
21. Logistically, would it be possible to evenly spread the amount of freight tonnage along the Pacific Rim harbors (San Diego, Long Beach, San Pedro, San Francisco, and Seattle). What would it take to ensure that a more efficient and effective On Time Delivery System be implemented? Would an upgraded of our national railway system help prevent unnecessary truck traffic through the counties of LA/Riverside/Ventura/ San Bernardino/San Luis Obispo, etc.? For example, can the coordination of freight goods that make their way towards the Midwest, or Northwest be dropped off at any of the northern bays rather than being distributed from the ports of Los Angeles or Long Beach?

22. Are the 710 Tunnel scrubber towers, and emergency exits going to be equidistant from each other? Indicate tower and exit locations. Can tower and exit locations be situated where there are no existing domiciles? If a scrubber tower is warranted in a residential neighborhood, can a four-block radius of green space circumscribe the scrubber tower?
23. How many people concerned about the 710 Tunnel have read ADVICE & PLANNING by Martin H. Krieger?

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:21 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: SR-710

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:21 PM -----

<lazzerfox@roadrunner.com>

04/10/2011 11:34 AM

To <ron_kosinski@dot.ca.gov>

cc

Subject SR-710

Ron Kosinski,

I am writing this to share my comments concerning the tunnel for the extension of the SR-710. I am a resident of Glassell Park and opposed to this idea in general.

1. The tunnel seems to be a bad idea since Los Angeles is earthquake prone and the feasibility of us having a major earthquake within the next decade is highly likely. We all know what happens when the earth moves and how much damage can happen. Especially if people are inside the tunnel when an earthquake occurs.
2. The toxicity of the fumes from the diesel trucks and gasoline vehicles being expelled into the atmosphere in a concentrated form. Since there are reported vents this seems the gases that escape from there will be more concentrated than a normal above ground freeway.
3. The additional traffic that will be created on off-ramps would just recreate the same problem Alhambra currently has where the SR-710 terminates at the north end.
4. The real reason this is even being looked at is due to the truck traffic generated by the ports of Long Beach and possibly Los Angeles. Rail seems to be a more logical way to go since the infrastructure is already in existence. Why not look at using that as the means of transportation for the port traffic to Kern County and regions north?

I am sure these points have been made many times before. I am a resident and tax payer who is currently opposed to the SR-710 Tunnel Project.

Cordially,

Patricia Douglas

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:35 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: 710 traffic mitigation alternatives for EIR

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:35 PM -----

Val Marquez <concerned_nbors@pacbell.net>

04/14/2011 04:58 PM

Please respond to Val Marquez <concerned_nbors@pacbell.net>

To <sr710conversations@metro.net>

cc

Subject 710 traffic mitigation alternatives for EIR

Please submit these comments and enter into the official EIR record.

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

Add two lanes to 710 entering the 10 freeway in each direction. Drivers missing the interchange have to exit Valley Blvd. adding to traffic bogs at Valley Blvd

Create a Hellman Ave. off ramp

Use of electric rail for freight movement from the ports
No build - end 710 at the I-10 Fwy and mitigate traffic on the I-10 Fwy West and East

Two right turn lanes going east on Valley Blvd and one single lane bridge overpass exiting the 710 west bound to Valley Blvd - This lane would be a continuous exit without stoplights that would merge with Valley Blvd - making it easier to get off the 710, relieving the corridor

PAMELA MARQUEZ
CONCERNED NEIGHBORS OF EL SERENO

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:35 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: 710 traffic mitigation alternatives for EIR

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:35 PM -----

PAMELA MARQUEZ <pamandval@yahoo.com>

04/14/2011 04:56 PM

To <sr710conversations@metro.net>

cc

Subject 710 traffic mitigation alternatives for EIR

Please submit these comments and enter into the official EIR record.

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

Add two lanes to 710 entering the 10 freeway in each direction. Drivers missing the interchange have to exit Valley Blvd. adding to traffic bogs at Valley Blvd

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Two right turn lanes going east on Valley Blvd and one single lane bridge overpass exiting the 710 west bound to Valley Blvd - This lane would be a continuous exit without stoplights that would merge with Valley Blvd - making it easier to get off the 710, relieving the corridor

PAMELA MARQUEZ
3118 LOWELL AVE
LOS ANGELES, CA 90032

Odom Stamps
318 Fairview Avenue
South Pasadena, CA 91030
Tel: (626) 441-5600

RECEIVED 4/14/11

April 13, 2011

Ron Kosinski, Deputy District Director
Caltrans, District 7
Division of Environmental Planning
100 South Main Street, MS 16A
Los Angeles, CA 90012

Re: **SR 710** Comments on **"Gap Closure"** Project NOP and Scoping Comments **Water Pollution**

Dear Mr. Kosinski:

It was my great pleasure to have been serving on the South Pasadena City Council when the FHWA rescinded the Record of Decision for a surface/cut and cover gap closure freeway through our town. I have many concerns about and objections to the latest Caltrans proposal of full bore tunnel, which sets out to accomplish the same thing - but I believe my City Council has prepared a thorough set of comments about the problems with the process and approach. Therefore I will confine myself to commenting on a major concern not yet addressed by the Council, which is the accelerated fouling of the Raymond Basin Aquifer, if two 50' diameter full bore tunnels are allowed to be punched through the Raymond Fault at a depth of 150 to 250'. This is where South Pasadena draws its water and it is some of the cleanest water in Greater Los Angeles - South Pasadenans want it to remain that way!

Currently the San Gabriel Valley ground water basin is being polluted by the NASA Jet Propulsion Laboratory Superfund Site on the La Canada/Pasadena border. The EPA lists it (EPA ID No. CA9800013030, Site No. 0903438) as having 12 soil and water contaminants including trichloroethylene, tetrachlorethylene, perchlorate, and volatile organic compounds at 20 times the level of concentration allowed by law. Not much has been (or can be done) about its spread since the extent of the pollution was identified in 1979.

The Upper San Gabriel Valley has been sounding the alarm that about its proliferation, and even South Pasadena has detected enough VOCs in one of its wells to require blending to reduce the concentration. I believe this would be greatly exacerbated by the big dig, and the potential for a new slip pathway to be created in and around the tunnel linings between the SG Aquifer and the Raymond Aquifer.

I have found no new water quality studies included for any of the five zones in your "route neutral feasibility study". New well tests should be undertaken throughout the 170 square mile region and this information must be included and analyzed to assess the impact of anything as great as what Caltrans proposes to undertake (the "largest tunnel in the world") - especially since it could potentially impact over 870,000 households that depend on this aquifer. Further, outside Engineers (unaffiliated with Caltrans, such as at regional Universities like Cal Tech) should be consulted regarding the potential for any drilled and cased tunneling to provide a slip path for conducting water, along the downhill gradients which you have shown in your schematic design sections.

Sincerely,

Odom Stamps

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:29 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:29 PM -----

<ma3coop@aol.com>

04/13/2011 11:19 PM

To <ron_kosinski@dot.ca.gov>

cc

Subject

Hello, my name is Mary Cooper and I have lived in my beautiful home for 25 amazing years now and my daughter Alexandria for 21. Throughout these fantastic years my daughter and I have come to develop some wonderful relationships with my neighbors who bring an element of warmth and security as we all make a from the heart effort to look out for each other and each others homes. However, I have also been under the impression for a large part of those 25 years that we would have an opportunity to purchase these homes. In short, this neighborhood has been so great to my family and I that it holds tremendous sentimental value and offers such unique character. I have listed below some alternative suggestion concerning the connection between the 710 to the 210 fwy which further jeopardizes or perhaps eliminates the opportunity of that purchase ever becoming a reality that I hope for so badly.

This connection can be created by using the Hellman Ave. off ramp, increase public transportation, complete the 110 Pasadena Fwy to 210 via the tunnel at Arroyo Parkway.
Add two lanes to the 710 entering the 10 fwy in each direction.

Please review and take into consideration my suggestions it means a great deal to my family and I.

received
4/8/11

April 7, 2011

Mr. Ron Kosinski, Deputy District Director
Caltrans District 7
100 S. Main St.
Los Angeles, CA 90012

Dear Mr Kosinski:

I am writing to protest the extension of the 710 Freeway to connect to the 210 Freeway. It seems obvious that the people on record in favor of that extension are, for the most part, those who would directly benefit financially from that project. The "No 710 Action Committee" is representing those of us who strongly believe that such an extension would compromise the environment even further by adding more trucks and other traffic to the 210 Freeway. On any given day, trucks dominate an already very busy freeway causing air pollution through additional particulate matter, extensive damage to the roads, and increasing the number and severity of traffic accidents. The last thing that is needed is to do anything that would increase those already enormous problems.

I have lived in La Canada for 39 years and have personally observed the complications caused ever since the 15 Freeway connected to the 210. I urge you to abandon any project that would connect the 710 with the 210 and increase the health and safety factors, as well as the road damage, even more extensively.

Thank you for your consideration.

Sincerely,

Marjorie E. Hanna

Marjorie E. Hanna
1045 El Vago St.
La Canada, CA 91011

Marge Piane

received 4/12/11

9 April 2010

Mr. Ron Kosinski, Deputy District Director
Caltrans District 7
100 S. Main Street
Los Angeles, CA 90012

Re: 710 Freeway extension

Dear Mr. Kosinski:

I greatly appreciate the outreach Metro is conducting in neighborhoods that may be affected by an extension of the 710 Freeway.

I live in Glassell Park, where the 2 Freeway meets the 5 Freeway. We are nowhere near the 710 Freeway, and a good distance from the 210.

Drivers who use the 710 to go to or from central Los Angeles, can already access the entire area by connecting to the 5 freeway; and a tunnel that would connect the 710 to the 2 freeway would virtually duplicate this existing connector route. Drivers who use the 710 to go to or from the eastern part of the city, or Pasadena and points along the 210 freeway—and do not currently use the 5 freeway connector--would not suddenly decide that heading away from their ultimate destination is a good idea; they will continue to use surface streets to get to the 210.

I appreciate that the people who live in Alhambra, Pasadena and South Pasadena don't want construction and/or freeway traffic in their neighborhoods; however, if the 710 is to be connected, it only makes sense to do it *directly* to the other "stub" that ends just south of the 210.

A "connecting" tunnel through Glassell Park might be the cheapest option, but it isn't an efficient or effective solution to the needs of commuters who use the 710.

I hope you will consider my comments when making your decision.

Thank you,

Marge Piane
Glassell Park resident since 1987

2267 Moss Av / Los Angeles, Ca 90065 / 323-255-5763 /mpiane@aol.com

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:37 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: 710 Scoping Study

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:37 PM -----

Julia Hastings <jahastings@att.net>

04/14/2011 10:07 PM

To <Ron_Kosinski@dot.ca.gov>

cc

Subject 710 Scoping Study

Dear Mr. Kosinski:

Although Caltrans is doggedly pursuing an obsolete "710 Gap Closure" scheme, it is not too late for you to step back and consider more viable, technologically sound, and environmentally solid ways to move freight and people from the Port of Long Beach through the L.A. Basin.

Mr. Kosinski, we urge you to look at options that would not worsen pollution, noise, public health and safety and traffic congestion while eating up billions in taxpayer dollars and leading to endless class actions lawsuits.

We challenge you to give as much attention and spend as much time and money scoping light rail transit, freight rail corridors, and outlying freight distribution centers as you have given to the outmoded "Gap Closure" model.

We ask that you do not let the shipping and trucking unions dictate our region's future -- they care only about prolonging one mode of transport: rubber tires on asphalt.

Show some vision. Drop this dinosaur of a plan, follow Governor Brown's lead and shift your thinking to a modern environmental paradigm which will help catapult L.A. to the forefront of transportation planning.

Do that, and Caltrans will be thought of as transportation innovators and pioneers.

But pursue a behemoth tunnel designed solely to service battalions of gas-guzzling, polluting big-rigs, and you will be seen as backward thinkers who would rather shill for the unions than make California safer, cleaner, and better for future generations.

Sincerely,

Lew and Julia Hastings
4855 Grand Avenue
La Canada-Flintridge, CA 91011

April 11, 2011

Ron Kosinski
Deputy Director
Division of Environmental Planning
Caltrans District 7
100 S. Main street, MS 16A
Los Angeles, CA 90012

RECEIVED 4/20/11

RE: **SR-710 Environmental Impact Report/ Scoping Request of May, 2011**

Dear Mr. Kosinski,

The scoping report and EIR/EIS must and does not include the cumulative impact of the related widening of the southern portion of the I-710. The omission of such a cumulative study and project definition constitutes unreasonable segmentation.

The scoping report and EIR/EIS must and does not contain an explanation of the need for and benefits of this project.

The scoping report and EIR/EIS must fully study the no-build and low-build/multi-mode options as the environmentally superior alternatives.

The scoping report and EIR/EIS must and does not include the alternative to transfer container cargo to the railways instead of trucks.

The scoping report and EIR/EIS must and does not provide an integrated land use and transportation system design.

The scoping report and EIR/EIS must and does not include the environmentally superior GRID project (see attached.)

Judy Bergstresser
1945 Meridian Avenue
South Pasadena, CA 91030

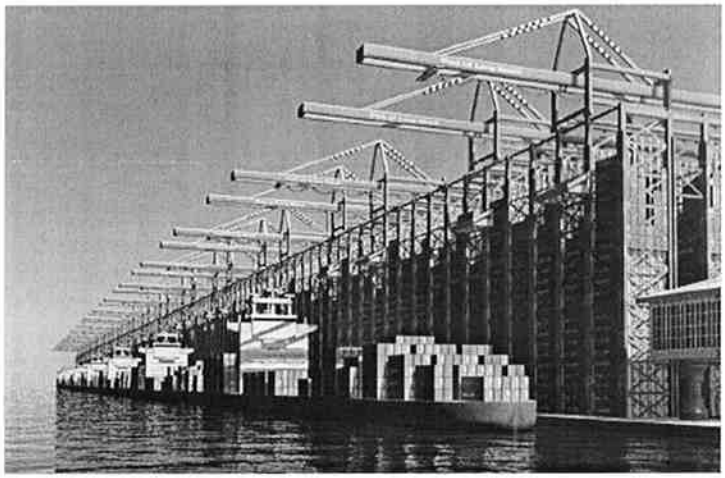
GRID – Gabriel River Infrastructure Development

A Major Problem is on the Horizon for Southern California. The Panama Canal is being widened to allow passage of large container ships. The Canal widening project is scheduled for completion in August, 2014. Once the wider canal is open, container ships from the Far East will have passage to US ports on the east coast. Significant revenue and jobs related to moving freight through the Ports of Los Angeles and Long Beach, the Union Pacific Railroad (UP), and the Burlington Northern Santa Fe Railroad (BNSF) will leave Southern California unless there is a significant improvement in the Ports' efficiency and cost competitiveness. Both UP and BNSF have planned upgrades to their container transfer facilities for a combined $1B, and the Ports have $1.5B in planned upgrades as well, but these are limited efficiency improvements that will not result in lower pollution levels. None of these projects reduce the excessive operating costs and labor inefficiency of container handling in the "golden mile" from cargo ship to Port gate. Each of these upgrade projects is being fought by environmental groups concerned about negative public health impacts, including increased smog, greenhouse gases, freeway truck traffic congestion, water pollution from construction and highway runoff and wildlife habitat disruption.

Living Conditions will Dramatically Decline for Citizens Living Along IH-710. In an effort to improve local freight movement to and from the Ports, Caltrans has proposed widening the southern part of the I-710 at an estimated cost of $6.8B. This project would require destruction of numerous homes and private properties to secure the proposed expanded right of way. Caltrans has also proposed building a toll tunnel in the San Gabriel Valley to extend the northern terminus of the 710 to the I-210. Cost estimates for tunnel construction have ranged from $3B - $14B. Both of these projects will increase local pollution levels and are strongly opposed by environmental groups, with active litigation.

GRID is a solution that merges economic imperatives with environmental concerns.

Streamline Ship-to-Rail Operations at the Ports. The "Superdock Container Facility" (SCF) converts otherwise unused space under current shipping cranes into a computerized storage facility for empty and loaded containers. Containers are moved to and from ships directly into the superdock. Full-length trains drive under or adjacent to the SCF to be loaded or unloaded within the Port, so there is no intermediate shuffling of containers to off-site container transfer facilities where currently trains are assembled for transport beyond Southern California. Use of the SCF could reduce unloading and reloading time for cross-country trains from 36 to less than 2 hours, at a much lower total cost than today's port facilities.

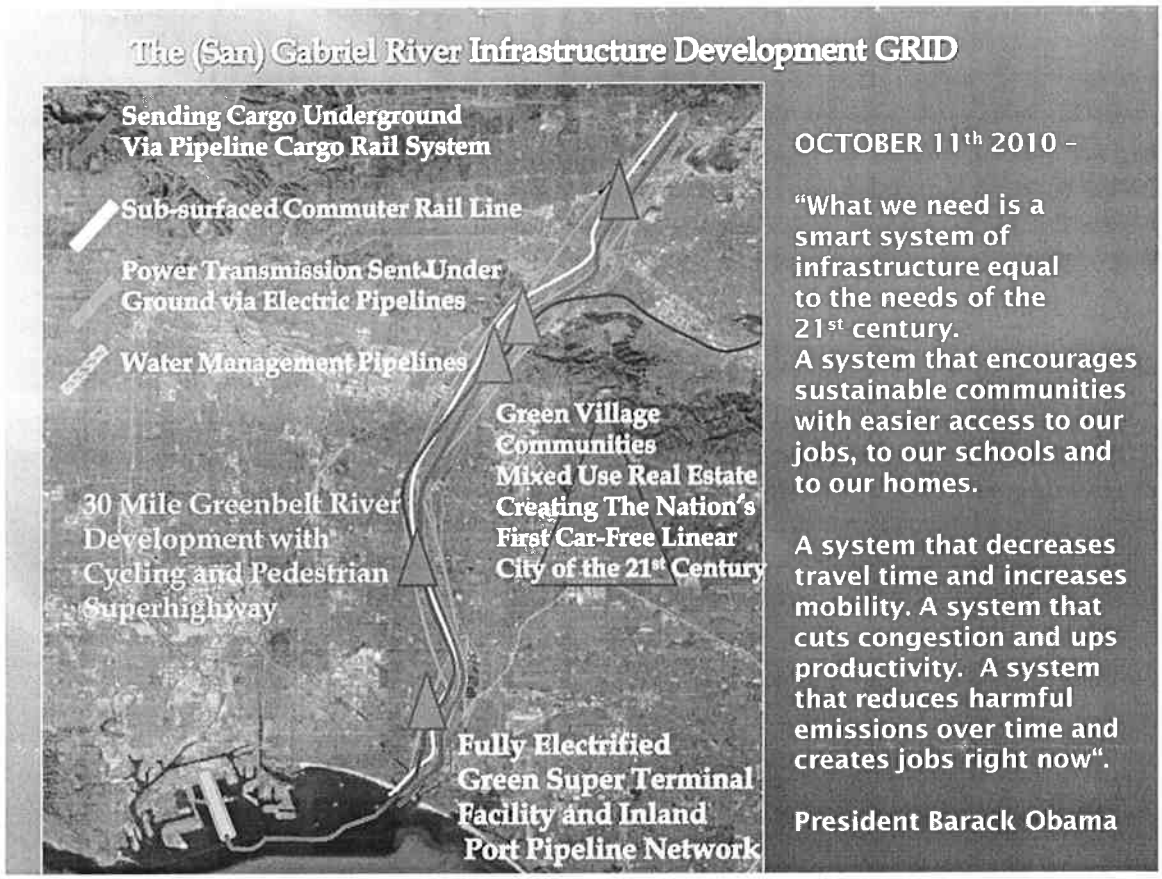


The Superdock Container Facility (SCF) consolidates ship to train loading for both Ports in one emission-free terminal.

Use Underground Pipeline for Electric Cargo Trains. To optimize movement of containers to and from Southern California and minimize

pollution, an underground, powered rail "container conveyor" freight pipeline is proposed to run from the SCF to inland rail hubs connected to existing warehousing and trans-loading lots in the Inland Empire, central California and beyond. This pipeline would move containers using clean electricity, drastically reducing diesel fume emissions and freeing up large sections of currently truck-bound highway for commuter use.

Embed Power and Water Transmission along the Freight Pipeline. The San Gabriel River bed is the ideal right-of-way location for an unobstructed "container conveyor" freight pipeline. Excavation of the river concurrently provides the opportunity for underground installation of electrical conduit so that the urban blight of high-voltage transmission towers are dismantled and removed. The thousands of acres currently occupied by power line rights-of-way will be made available for massive urban renewal. Pipelines could be included to carry desalinated water and for mitigation of storm water runoff that currently causes downstream pollution and waste.



Create an Urban Greenbelt Interspersed with Environmentally Sustainable Neighborhood Clusters. Following pipeline construction, the San Gabriel River can be rehabilitated to restore and protect the watershed naturally. Ecologically sustainable, transit-oriented higher-density villages will be connected by a greenbelt of walkways, bikeways, parks and sustainable aquifers. Clustered, affordable housing with pedestrian-friendly streets creates livable neighborhoods, reduces dependence on the automobile, lowers infrastructure cost and allows for aesthetically pleasing, protected open spaces. Commuter light rail connecting the six existing east/west Metrolink, light rail and Amtrak lines will

dramatically increase mobility and reduce the need for trips to the downtown Union Station merely for interconnection.

Together, These Projects are GRID, the Gabriel River Infrastructure Development. GRID will slash diesel emissions and substantially relieve highway congestion. Construction of GRID will not block or hinder any existing traffic routes. GRID will save port and transportation jobs that would otherwise be lost to Panama and Mexico while and creating thousands of new opportunities. Approval of GRID will obviate the need for each railroad's independent new container transfer facilities, several Ports upgrades, the widening of southern I-710 and a tunnel for the northern SR-710. The $15B to $23B estimated cost for those projects can be applied as funding for a Public Private Partnership for GRID. Total cost for GRID is as economically feasible as existing proposals that simply expand and exacerbate the problems they attempt to resolve. Nearly all aspects of GRID can be domestically engineered, manufactured and fabricated so that GRID would provide hundreds of thousands of jobs to California other of our nation's states.

For additional information on GRID contact David Alba, Project Systems Designer, at (626) 513-3650 or davidalba1@gmail.com.

April 8, 2011

RECEIVED 4/14/11

Mr. Ron Kosinski
Deputy District Director
Caltrans District 7
100. S. Main Street
Los Angeles, CA 90012

RE: Proposed 710 tunnel and La Canada

Dear Mr. Kosinski:

I am writing to express my great concern over several aspects of the proposed 710 tunnel and the its possible negative effects on the city where my family resides, La Canada. These are my serious concerns:

1.) Increased Traffic. Truck and car traffic would overwhelm the 210 that runs through La Canada, and it is already overwhelming. Since the extension of the 210 freeway a few years ago, La Canada has seen an extraordinary increase in car and truck traffic, so much so that it is now extremely difficult and dangerous to exit through the right lane into La Canada when coming from either direction on the 210. There is simply a wall of trucks. The sound of this increased traffic has increased exponentially and we in La Canada live with a constant roar of the freeways.

2.) Increased Particulate Matter from Increased Traffic. Our town has several schools which are constructed right up against the highway. We already worry about the amount of particulate matter and exhaust our children are exposed to, and we are very concerned for their health if a significant increase in traffic results from the 710 tunnel.

I ask you to please listen to the people of La Canada and the other cities which would be negatively impacted by the construction of this tunnel. I am very much against this drastic proposal.

Yours truly,

Judy Baldwin

Judy Baldwin

03.10.11

Ron Kosinski, Deputy District Director RK
Division of Environmental Planning
Caltrans, District 7
100 South Main St., MS 16A
Los Angeles, CA 90012

received 3/11/11

Dear Ron,

For the sake of the environment and the well-being of all residents living in your district, I beg you to do everything in your power to proceed with the Completion of the 710 Freeway. As you know, street traffic has greatly increased in your district. For example, I have lived in my home on the northwest corner of Wentworth Road & Los Robles Avenue, in San Marino, since 1969 and have witnessed the growth of traffic from 13,000 to 20,000 per day, during the years 1995 to present. And Los Robles in San Marino is a residential street.

In making your decision to complete the 710 Freeway, I believe you must abide ~~by~~ the wishes of the majority of residents and business owners in your district. The fact that the city of South Pasadena has blocked progress over so many years, has posed a great problem for those of us who do not live in that city. The majority has suffered, and that is unfair.

Please, please proceed with the completion of the 710 Freeway. Our quality of life is in your

hands.

By the way, since 1998 I have been active in the Los Robles Neighborhood Traffic Committee in urging the San Marino City Council to ~~improve~~ mitigate traffic conditions here, but without the cooperation of Caltrans, their efforts have been futile.

I plan to attend the March 30th meeting at Lake Avenue Church in Pasadena and look forward to meeting you there.

Sincerely,

Judith O'Keefe
403 Winthrop Road
San Marino, CA 91108

Phone (626) 799-4349
Email jukyo403@msn.com

received 4/8/11

SR-710 Conversations – A Series of Information Meetings

WEDNESDAY MARCH 30, 2011

NAME: JUDITH O'KEEFE

ADDRESS: 403 WINTHROP RD. CITY: SAN MARINO ZIP: 91108

REPRESENTING: LOS ROBLES NEIGHBORHOOD ASSN. (109 RESIDENTS)

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

(1.) WE URGENTLY REQUEST AN EIR BE DONE ON THE 1.9 MILE STRIP OF LOS ROBLES AVENUE THAT RUN'S FROM HUNTINGTON DR. NORTH TO PASADENA CITY LIMIT AND CARRIES BETWEEN 14,000 TO 20,000 CARS PER DAY, ON A RESIDENTIAL STREET! SPECIAL ATTENTION SHOULD BE GIVEN TO THE INTERSECTION OF HUNTINGTON DR. AND LOS ROBLES, WHICH IS DANGEROUS FOR BOTH NORTH + SOUTHBOUND TRAFFIC.

(2.) WE WOULD GREATLY APPRECIATE HAVING A MEETING IN SAN MARINO, PERHAPS IN LATE APRIL OR MAY, SIMILAR TO THOSE HELD IN OTHER CITIES. THANK YOU FOR YOUR EFFORTS SO FAR. KINDLY RESPOND TO ME AT judyo403@msn.com. J O'Keefe

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

P.S. WHO SHOULD I CONTACT TO FIND OUT THE SOURCE OF FUNDING FOR THE SOUTH PASADENA / FAIR OAKS STREET BEING TORN UP AND NARROWED? WHAT A MESS AND THAT CITY HAS BEEN AGAINST COMPLETION OF THE 710 FWY. FOR YEARS! I'D ALSO LIKE TO FIND OUT IF AN EIR WAS DONE PRIOR TO THIS PROJECT. JO'K

Metro Caltrans

Ron Kosinski/D07/Caltrans/CAGov
04/15/2011 12:36 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: Scoping Comment

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:36 PM -----

<joanneno710@aol.com>
04/14/2011 09:18 PM

To <ron_kosinski@dot.ca.gov>
cc
Subject Scoping Comment

4/14/11

Ron Kosinski, Caltans Deputy Director Environmental

RE: 710 Gap Closure EIR/EIS Scoping Comments

The 710 freeway controversy is the longest running freeway fight, involving the most historic properties in the country. For more than 60 years (first proposed in the 30's) the City of South Pasadena has officially been opposed to the freeway with their first opposition resolution passed in 1949.

I'm sure you will be receiving many letters commenting on this extremely complex, multi layered issue. My letter will focus on perceived and actual support for the project.

For many years, a small group of freeway proponents, through illusion, have created the perception that there was tremendous support for the freeway. But, this perception is not reality.

In the last 20 years, there has been only one official public hearing for the California Transportation Commission (CTC) in September of 1993. The following data as to the numbers for an against the freeway was obtained from Caltrans, the lead agency. This is actual real, factual data as opposed to fantasy, creative statements from a public relations consultant or a politician.

WRITTEN RESPONSES

1401 total 2 to 1 against

ORAL RESPONSES

204 total 5 to 1 opposed (these citizens actually took the time to come to come to the hearing express their views)

These numbers show the depth of the opposition from the citizens/stakeholders who live in the 710 corridor and will be affected negatively by the project.

At the beginning of the 710 Conversations and continuing into the pre-Scoping and Scoping meetings, the public had been asked to express their opinion on the 710 Gap Closure. We were asked to say what we wanted and didn't want as far as the project.

The people have been very loud and clear and have said "NO" to any freeway, toll way, tunnel and yes to any type to of multi mode, non-freeway alternative now and in the past.

It is time, after 70 years to end this controversy once and for all. A freeway is not he answer...it will not solve the problem but a multi mode alternative will.

Thank you for your time and we hope that this time, through this process, we can actually end this fight

Joanne Nuckols
1531 Ramona Ave
South Pasadena, CA 91030

626 799-1014

Ron Kosinski/D07/Caltrans/CAGov
04/15/2011 12:24 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: 710 Freeway Completion

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:25 PM -----

James Price <pingomingo@hotmail.com>
04/12/2011 05:12 PM

To <ron_kosinski@dot.ca.gov>
cc
Subject 710 Freeway Completion

Mr. Kosinski,

Nothing has been offered that can be seen as a legitimate reason for postponing the completion of the 710 Freeway.

For the sake of the people of Alhambra, South Pasadena, Pasadena, and other affected communities, I would urge the powers that be to resume construction of the 710/210 connection. This project has been held up, for no good reason, for quite a long time. Detractors have found no legitimate potential for detrimental impact. Noise? We all must put up with noise in the 21st Century. We need this freeway connection.

Jim Price
Pasadena

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:19 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: Proposed tunnel routes for the extension of the 710 freeway.

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:19 PM -----

Jim and Susan Stauffer <stauff3000@yahoo.com>

04/07/2011 12:29 PM

To <Ron_Kosinski@dot.ca.gov>

cc

Subject Proposed tunnel routes for the extension of the 710 freeway.

Dear Mr.Kosinski.

I am a La Canada Flintridge resident who will be negatively impacted by the completion of the proposed tunnels to extend the 710 freeway. La Canada has already been impacted severely by the connection of the 210 freeway to the 15 which has routed more and more large trucks onto the 210 heading both east and west. The increased freeway noise is ruining our community as well as the increased toxic levels from exhaust fumes. If the 710 extension tunnels are completed, this will increase the heavy traffic onto the 210 through La Canada and further the environmental impact on the community.

I would like to see a "hot spot analysis" for La Canada Flintridge area which houses some 23,000 residents, three schools, two of which are located close to the 210 freeway; a hospital located at the junction of the 2 freeway and the 210 freeway, two parks with playgrounds located near the 210 freeway (one is located on top of the freeway tunnel) and numerous hiking and horseback riding trails that crisscross the community adjacent to the 210 freeway which runs literally through the center of the community. All of these are "sensitive receptor community sites" that will be adversely affected by increase pollution from increased traffic on the 210 freeway in both west and east direction. In fact, The Los Angeles Times published an article referencing the serious health issues resulting from pollution that raised awareness and is cause for great concern.

Mr. Ron Kosinski, Deputy District Director LK
Division of Environmental Planning
Taltransm District 7
100 S, Main Street, MS 16A
Los Angeles CA 90012

March 15, 2011

Dear Mr. Kosinski,

We have been informed that the proposed extension of the 710 freeway may require a tunnel 3 to 4 miles long. The following is a list of concerns and a recommendation. I would appreciate this being taken into consideration

Summary of Concerns:

Truck inspections would result in greater congestion than we now experience:
The tunnel will be a prime target for a terrorist. Cell Phones would have to be restricted. In addition the tunnel would be vulnerable to fire. The Holland Tunnel (2.6 miles long) in New Jersey/New York requires restrictions on both the size of the trucks and the materials they carry (no flammable materials). *In 1949, a fire aboard a chemical truck caused enormous damage to the south tube of the tunnel. Although no one was killed, the fire resulted in 66 injuries. As a result, the Port Authority adopted a strict series of rules on the transportation of hazardous materials within the tunnel.*

Safety of life/Liabilities:
If a vehicle caught fire in the tunnel, and it was during rush hour, it would be impossible for emergency crews to respond in time before the oxygen in the tunnel was depleted resulting in fatalities

As was the case in the Mont Blanc 1999 fire, Public officials, Cal Trans, as well as those professional persons involved in recommending, as well as approving this tunnel venture, would be liable and subject to manslaughter charges. As was the case in the Mont Blanc Tunnel Fire, when 39 people died. *A Belgian transport truck carrying flour and margarine caught fire in the tunnel.*

Federal Employee Safety requirements:
In that many of the truck drivers would be employees of a company, OSHA approval would be required before any employee would be required to use this tunnel.

Recommendation:

Due to both the hazards and truck restrictions, it is recommended that there be a rail system for trucks/containers. In addition, One Way streets with traffic flow control stop lights, such as is done in Denver, to move traffic through to the connecting freeways. This would be restricted to single axel trucks with in state license plates only. Of course light passenger rail connecting to the the current rail system would further enhance the quality of life in the area.

Yours truly

Jerome Berkman

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:28 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: 710 traffic mitigation alternative

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:29 PM -----

Jennifer Perez <jennifer1069@sbcglobal.net>

04/13/2011 09:33 PM

To <sr710conversation@metro.net>, <ron_kosinski@dot.ca.gov>

cc

Subject 710 traffic mitigation alternative

Hello,

I am opposed to connecting the 710 and the 210 freeway. I think that we can improve traffice congestion by having signal synchronization it is a cost-effective way to increase street and road capacity without major new construction. Orange County Transportation Authority, in partnership with California Department of Transportation (Caltrans), had success. Why not Alhambra?

Sincerely,
Jennifer Perez

Mr. Ron Kosinski
Deputy District Director
Caltrans District 7
100 S. Main St.
Los Angeles, CA 90012

RECEIVED 4/14/11

April 8, 2011

Mr. Kosinski:

As a resident of the city of La Canada Flintridge, I believe that I am a stakeholder in the upcoming look at the 710 extension project. I was not able to attend the meeting that was held in La Canada Flintridge earlier this week so I am writing to ask that you provide me with answers to the following very important issues that I believe should be evaluated during this time.

First, as a parent who has children at Flintridge Preparatory, I am well aware of the freeway in its current state. We pick up and drop off our children right under the 210. The impacts of the freeway are easy to see. Soot, grime and the accompanying pollution must have an impact on these children. It is easy to see why the State has built up laws to keep schools and new freeways a certain distance apart. Given the potential to expand traffic (some reports are absolutely stunning!), I would like to know how you plan to address keeping the children from being exposed to even more harmful polluted air.

Flintridge Prep is not in a unique situation. One look and anyone can tell you, this is a special place. St. Bedes. St. Francis. La Canada High School. All are within a stone's throw from each other. All future generations of children who will be attending these schools need to have their rights to healthy air quality addressed. After all, school is not an "option". Children are required to spend many hours of their day on campus. Expanding traffic through this sensitive zone is akin to building an additional freeway through this area.

People also should understand when traffic is going to be most impacted. If those hours overlap with school days, then this project should be dropped immediately. If there are ways to shift hours to evenings, how much would that cost? Harming our children because of our inability to think creatively is a sad excuse. I believe that the public deserves more scrutiny and analysis than has been provided thus far.

Second, I would also like to know what other methods have been evaluated. Has Caltrans shown potential future leadership by looking into alternative methods of transportation? Currently trucks are the "preferred" method of delivery, but how much is that truly costing our society? Can Caltrans actually quantify the cost of truck delivery vs rail delivery on a societal basis? Traffic, air pollution, destruction of our infrastructure. In my opinion, trucks have many other

costs associated with them that are not being accounted for in your analysis. I would like to understand the magnitude of those costs and a more "fair" comparison before we simply go with the standard answer, that what we are doing today is what we are going to be doing tomorrow.

To accomplish this, Caltrans should first determine how much it would save our commuters if trucks were not allowed on the road during rush hour (or paid more to do so?). Wouldn't evening pickup and dropoff be a simple solution that would help alleviate traffic accidents and congestion? Today's answer is probably cost, but I would argue that current fees being charged this industry are out of line with the true cost to society. I would like to see an analysis done on nighttime delivery vs daytime delivery so that perhaps trucks using a freeway during rush hour are charged a multiple of those using it during the evening hours.

Finally, given the budget situation, I am actually stunned that your entity would even be approaching this subject in today's world. We have so many serious issues that need to be addressed. I found the spending of monies to put traffic lights on our on-ramps to be bizarre, but this project may take the cake. I see many similarities between this project and the Big Dig in Boston. That project, as you are probably aware, came nowhere close to its initial estimates. I would like to Caltrans to address the similarities and the potential risks we have for overshooting the current budget estimates. In all frankness, it is shocking and almost perverse for us to be undertaking such a project when the roads are in the condition that they are and the budgets are in the condition that they are. I believe a comparison and analysis of just how much this project is really going to cost us is also of great importance.

I look forward to your response to these three issues.

Best,

Jeff Wang

GRIFOLS

Grifols, Inc.
2410 Lillyvale Avenue
Los Angeles, California 90032
Tel: (323) 225-2221
www.grifols.com

March 31, 2011

Ron Kosinski RK
Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

RE: The Caltrans Environmental Impact Report / Environmental Impact Statement for the I-710 Gap Closure Project Must Include the Likely Impacts at Grifols' Biologics Production Facility on Valley Boulevard

Dear Mr. Kosinski,

Grifols owns and operates a major biologics production facility at the Northern terminus of I-710 and Valley Boulevard. At this facility Grifols produces life-saving biologic therapies manufactured from donations of human plasma that are used to treat chronically ill patient populations worldwide. Because of the complex and environmentally sensitive processes employed at the Valley Boulevard facility, the Caltrans EIR/EIS for the I-710 gap closure project must consider the potential impact on Grifols' operations.

Grifols is one of the leading plasma therapy producers worldwide and is one of only five producers that supply US patients. Even temporary or unscheduled interruptions of Grifols' operations could have significant adverse public health consequences. Patients who use Grifols' products often suffer from chronic, life-threatening conditions that require life-long treatment. Some of the conditions that Grifols' products treat include bleeding disorders such as hemophilia, primary immune deficiency diseases, shock, trauma and burns. Without regular treatment, many of these patients would suffer needlessly and die prematurely.

The lengthy and complex process of producing plasma therapies involves many high-tech, environmentally sensitive processes. Individuals who enter the production environment are required to wear specialized outer garments and follow a strict protocol for cleaning and gowning to avoid any possible contamination of the products. The production environment is continuously monitored for a wide array of pathogens and contaminants to ensure the purity of the therapies. Even small air leaks or other external exposures could jeopardize the product integrity and potentially endanger patient health.

The careful production of these delicate biologic therapies could be severely impacted by the dust, debris and vibration typically associated with a major construction project such as the I-710 gap closure project. Of particular concern is the likely spread of contaminants via air, vehicular traffic and pedestrians resulting from large-scale earth excavation. Given the fact that some of the current plans include a tunnel access point to be located at the foot of the Grifols facility, the disruption caused by such a construction project would likely last for several years. A construction project such as this must be carefully considered and implemented to avoid compromising product integrity or disrupting product supply.

Grifols is perhaps one of the largest business entities in the proposed impact zone. More than 600 people are employed at the Valley Boulevard location and in the past eight years, Grifols has invested hundreds of millions of dollars in the construction of new facilities and substantial upgrades to existing facilities. As a consequence, it is imperative that the potential impact of the I-710 gap closure project on Grifols' operations be fully studied and considered. It is worth noting that the availability of the plasma therapies like those that Grifols produces, is a matter of significant public health and has been the subject of intense scrutiny from Federal regulators and members of the US Congress.

We look forward to maintaining an ongoing dialogue with you and your office about the potential impacts of the proposed I-710 gap closure project. In the interim, please let us know what steps to take to ensure that environmental impacts on our facility are included in the scope of the EIR/EIS.

Best regards,

Greg Rich
President and CEO
Grifols Inc.

Willie Zuniga
President and CEO
Grifols Biologicals Inc.

4-11-2011

received 4/14/11

FROM - GLORIA DOWNER
31 NORTH SECOND STREET, APT. A
ALHAMBRA, CALIF. 91801-6203

TO - MR. RONALD KOSINSKI, DEPUTY DISTRICT DIRECTOR
DIVISION OF ENVIRONMENTAL PLANNING
CAL TRANS DISTRICT 7
100 SOUTH MAIN STREET, MAIL STOP 16A
LOS ANGELES, CALIF. 90012

DEAR MR. RONALD KOSINSKI

I NEED YOUR HELP P-L-E-A-S-E
TO EXTEND THE 710 FREEWAY
TO THE 210 FREEWAY ...

ALL YOUR HELP IS GREATLY APPRECIATED

YOURS TRULY,

Gloria Downer

GLORIA DOWNER

Ron Kosinski
Deputy District Dir.
Caltrans District 7
100 S. Main St.
L.A. CA 90012

April 7, 2011

received 4/8/11

Re: 710 Fwy Extension

I am against extending the 710 Freeway. My issues are noise and pollution; therefore health & quality of life issues. When the 210 was extended out to the La Verne area, my neighborhood in LCF got significantly noisier and dirtier. There is no longer fresh air outside. Take a deep breath, and you can taste it & smell it. Adding more freeways in L.A. (LCF, specifically) will make our community a lot less healthy. No matter what freeway(s) we add, they will be full within a few years, & then we'll need more, & then some more - It's a never ending "need" to get somewhere faster. The cost: our health. I hear trucks & "jake brakes" all night long. They wake me up; keep me awake; its detrimental to my health not to get a decent night's sleep. Let's go light rail & keep the toxins to a minimum — No more Freeways!! G Caldwell LCF 9/2011

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street Mail Stop 16A
Los Angeles, CA 90012

received 4/8/11

Dear Mr. Kosinski,

RE: SUPPORT FOR THE 710N GAP CLOSURE PROJECT AND COMMENTS FOR ENVIRONMENTAL REVIEW

This writing is being sent to you so we can be on the record on the 710N Gap Closure project. We support a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed NOW.

Please include the following in the environmental analyses:

- The Gap has been in existence for nearly 40 years creating much confusion for drivers; let's fix this! The EIR should show how all freeways and major roads in the area in four directions will benefit from the closing of the gap.
- Air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved; the EIR should demonstrate both of these aspects to show actual project benefits.
- Our commutes will be easier and take less time to go to work and come home; the EIR should take into account how closing the gap improves the quality of life for many people.
- Jobs will be created during these tough economic times; the EIR should detail how the project helps our economy in creating jobs and in other ways such as the benefit to the tourism industry; for example, visitors to Los Angeles will actually be able to reach their destination when using the 710N freeway instead of being routed off through local communities.

Please continue the environmental process with all due speed. Remember we voted, along with 2/3 of all Los Angeles County voters, for Measure "R" that calls for the 710N Freeway to be completed.

We cannot wait another 40 years for this project to become a reality.

Sincerely,

Eric Jacek
303 W. Linda Vista Ave., #17
Alhambra, CA 91801

SR-710 Conversations – A Series of Information Meetings

received 3/30/11

Wednesday, March 16, 2011

NAME: Edward Neill,

ADDRESS: 1105 Leonard Ave, CITY: Pasadena, ZIP: 91107.

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski, RK
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

I moved to Alhambra in 1930. I have seen it grow over the years. I bought my apartment on Garfield, Alhambra in 1971. After the 710 Freeway was opened to Valley Blvd. the following streets have been congested by traffic: Fremont, Atlantic and Garfield.

The over use of Garfield has really hurt me. A left turn lane was added in front of my apartment, eliminating parking because of this lane. A signal was added also. Now there is no parking in the street red curb. Also heavy traffic backs up between the hours of three and seven p.m. My tenants cannot get of my driveway or risk

over, please.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

their lives fighting traffic.

At one time I had Alhambra city place a trailer with the speed on it. The police handed out a number of tickets, but never repeated it.

Also I have trouble renting my apartments. In order to rent I am $900 a month under the going rate, which is big loss.

This congestion hurts more people in Alhambra than running the freeway through South Pasadena. Why could not the freeway be extended to Huntington Drive? This would improve Alhambra, and let South Pasadena solve the problem!

I am am an older citizen and feel that I probably will never see this problem solved.

Edward R. Neill

THE MONY GROUP

MONY Life Insurance Company
811 North Bushnell
Alhambra, CA 91801
www.mony.com
626 289 8450
626 281 2265 Fax

RECEIVED 4/14/11

Don R. Keenan
Financial Professional
CA Lic. # 0166437

April 11, 2011

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street, Mail Stop16A
Los Angeles, California 90012

Dear Mr. Kosinski,

Regarding support for the 710 Gap Closure, we support the 710 extension to the 210 freeway. It is my belief that you and your people have many facts and your final recommendation will be the best for all concerned. In this letter I have included the four-way test that Rotary International has found will help in making the correct decisions.

1. Is it the truth?
2. Is it fair to all concerned?
3. Will it build goodwill and better friendships?
4. Will it be beneficial to all concerned?

As a voter in the San Gabriel Valley living in Alhambra since the third grade in 1946, it appears to me that the courts decision of the week regards the 710 extension to the 210 should be on its way to completion.

We have lived in our present home on North Bushnell Ave. in North Alhambra for 47 years. The street is composed of single family dwellings with a few duplexes and triplexes mixed in. Each day, Monday through Friday from 4:00P.M. to 6:30P.M., it becomes a 710 extension because people drive to the end of the 710 on Valley Blvd., then turn right on Valley to Marengo, then left to Alhambra Road and turn north on Bushnell Ave. (our street) The drivers are headed for Huntington Dr. a block north on our street. On the way up, they forget this is a residential street and proceed at very fast speeds just as if its part of the 710. In the past animals have been killed, but to this point, no children. However, it's just like an earthquake, it will happen, it's just a matter of when. In the big picture, this is life but may be unnecessary. How many other streets in our city are facing the same problem?

Registered Representative. Securities are offered by MONY Securities Corporation, Member NASD, SIPC, 1740 Broadway, New York, NY 10019, 800 736 0166. MONY Life Insurance Company and MONY Securities Corporation are members of The MONY Group.

It appears it's time for our leaders to make a decision as over 40 years seems time to move on. A relatively small group of people have been stalemating this too long and its time to do it!

Like our families, the kids can complain and jump up and down to get their way, but in the end Mom and Dad have to decide what is best. It's now time for our leaders to get it done.

Thank you so very much for taking the time to read this letter.

Sincerely,

Don and Marilyn Keenan and Family

April 7, 2011

Ron Kosinski
Deputy Director of District
CALTRANS-DISTRICT 7

received
4/12/11

Dear Sir:

As a citizen of La Canada-Flintridge, I am very concerned re: the quality of life here, for myself, my children, and all the people in Southern California.

NO on the #710 connection to the #210.

It would massively affect the pollution of every kind in this community and a wide surrounding area:

AIR POLLUTION

NOISE POLLUTION

AESTHETIC (VISUAL BEAUTY) POLLUTION OF THE AREA

The above qualities are important to SAVE OUR AREA AND PLANET & quality of life.

Sincerely,

Diane D. Harrison
4027 Dover Rd.
La Canada-Flintridge, Ca. 91011

received
4/18/11

April 13, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

File: 07-LA-710
PM 26.7/32.1
EA/Project ID:
187900/0700000191
710 Gap Closure

Subject: Notice of Preparation (NOP)/Notice of Intent (NOI) for a Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the 710 Gap Closure (State Clearinghouse No. 1982092310)

Dear Mr. Kosinski:

The information contained in this letter is provided for your agency's use. My comments are based on the narratives of the NOP/NOI indicating Caltrans' intent to prepare a Draft EIR/EIS for the State Route 710 Gap Closure Project ("Project"), as well as on the noticing effort for public scoping meetings. These comments are in sync with the requirements of the California Environmental Quality Act (CEQA), the State CEQA Guidelines, the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ)'s NEPA Regulations, to name just a few of the many federal, state, and local environmental regulations and laws that the Project may potentially trigger.

There are several substantive inadequacies and procedural errors in the NOP/NOI that merit the consideration of Caltrans in revising and re-circulating the NOP/NOI. Other issues are raised as well in this letter that can or will influence the preparation and processing of the Draft EIR/EIS.

1. **No specific details in the NOP/NOI on the proposed Project/proposed Action.**
    a. Without specificity in the NOP/NOI, the narrative reads more as a feasibility study rather than a well defined construction activity. Five possible route alignments are alluded to, but none are specifically identified either in the text or in the attached figure included with the NOP. A wide study area in the San Gabriel Valley is shown in the NOP, but not the specific construction impact zones within it. An NOP/NOI is not the vehicle to develop a project description, but rather to seek out from others what their environmental concerns are with the project as proposed. If Caltrans is still defining its Project, time would be better spent to develop a feasibility study first prior to going through the expensive and time consuming CEQA/NEPA process at this stage.
    b. The NOP/NOI indicates that several general possibilities exist in closing the 710 gap with the following (but not limited to): "...surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems, local street upgrades, traffic management systems and a no build alternative." With no specificity, agencies and public alike have no idea what is the true nature of the Project. Section 15082 of the State CEQA Guidelines and 40 Code of Federal Regulations (CFR) 1508.22 clearly spell out the contents of a NOP and NOI, respectively. Caltrans' version does not adequately comply with these CEQA/NEPA requirements.

2. **The lack of specificity diminishes the role and responsibility of each commenting responsible, trustee and federal public agencies.**
   a. Without a well written NOP/NOI, affected agencies are unable to fulfill their roles and responsibilities for written comments to the lead agency (i.e., Caltrans). Section 15082(a)(1) of the State CEQA Guidelines state: "The notice of preparation shall provide the responsible and trustee agencies and the Office of Planning and Research with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response." Section 15082(b)(1) of the State CEQA Guidelines further state: "...each responsible and trustee agency ... shall provide the lead agency with specific detail about the scope and content of the environmental information related to the responsible or trustee agency's area of statutory responsibility that must be included in the draft EIR." How can these agencies write anything meaningful when the NOP/NOI is so ambiguous?
   b. The State CEQA Guidelines also mandate in Section 15082(b)(3): "A generalized list of concerns [by the responsible or trustee agency] not related to the specific project shall not meet the requirements of this section for a response [to the lead agency]." If the agencies don't know the specifics of the Project, and a generalized list is not sufficient, then how can they meet their statutory requirements under CEQA or NEPA?
   c. Public agencies are now under dire budget constraints and understaffed. It is not appropriate to send out a vague NOP/NOI that requires these agencies and the public to take the time and research effort to figure out whether or not they should comment. CEQA specifically states that: "Documents prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decision makers and to the public." [Public Resources Code, Section 21003(b)]

3. **The approach to advertising the public scoping meetings was confusing.**
   a. The transmittal letter and the NOP from Caltrans (dated February 28, 2011) to Responsible, Trustee and Federal Agencies indicated six public scoping meetings. The NOI posted by the Federal Highway Administration in the Federal Register (March 9, 2011) indicated these six public scoping meetings plus an online virtual scoping meeting to be held on March 21st and to be on demand through April 14th. Why was the virtual scoping meeting left out of the February 28th letter to the responsible, trustee and federal agencies for the NOP process?
   b. On March 9, 2011, Caltrans published a legal notice on the public scoping meetings on page 7 in the *South Pasadena Review*. Here, only three meetings were noted, in El Sereno, Pasadena, and the online virtual meeting. Yet, there was no mention of the South Pasadena scoping meeting.
   c. In the same new local newspaper, on page 2, a large advertisement states: "SR-710 Conversations" "You are invited to a series of Metro community meetings." "Series 3: Scoping – Going on the Record." The purpose of a public scoping meeting is fairly well defined both under CEQA and NEPA, yet this ad seems to focus on "a community meeting", which does not necessarily suggest or merit the kind of participation the working public may attend were it to be a true CEQA or NEPA public scoping meeting.

4. **The NOP did not contain an e-mail address for affected public agencies or the public to submit comments.**
    a. Due to recent changes in the statute, e-mail messages can be sent to the lead agency for commenting during the EIR process. The NOP does not state that such venue is available. According to PRC Section 21091(d)(3)(A): "With respect to consideration of comments received on a draft environmental impact report, proposed negative declaration, proposed mitigated negative declaration, or notice received pursuant to Section 21080.4 [this section is in reference to a Notice of Preparation], the lead agency shall accept comments via e-mail and shall treat comments as equivalent to written comments."
    b. Many public agencies, along with the public, today use e-mail messages as their primary mode of written communication. Referring back to the *South Pasadena Review* ad on page 2 of the March 9th edition, the SR-710 Conversations noted three social media addresses:
        i. Email: sr710conversations@metro.net
        ii. Facebook: facebook.com/sr710conversations
        iii. Twitter: twitter.com/sr710convos

        On page 7 in the Legal section, Caltrans advertised the website: www.metro.net/sr710conversations.

        So, are these four social media networking addresses all valid to provide comments on the NOP? And if so, why were they not mentioned in the NOP to affected public agencies and in the NOI as published in the Federal Register?

5. **The role of the Federal Highway Administration (FHWA) for this proposed Action is not spelled out in the NOI.**
    a. The NEPA Pilot Program MOU allows Caltrans to assume the role and responsibilities of FHWA under NEPA and various other federal requirements. However, caveats exist. MOU Section 3.2.3 indicates: "The USDOT Secretary's responsibilities for government-to-government consultation with Indian tribes as defined in 36 CFR 800.16(m) may not be assumed by Caltrans under this MOU." Section 3.2.4 further states "...conformity determination required under Section 176 of the Clean Air Act..." must also not be assumed by Caltrans. Section 3.4 of the MOU sets out other limitations as well. With these caveats in mind, who in FHWA will be responsible for those duties that Caltrans cannot legally assume while the CEQA/NEPA process is ongoing? Is it Shawn E. Oliver, who signed off on the Federal Register notice for the NOI? Yet that notice reads that "Comments or questions concerning this proposed action and the EIS should be directed to Caltrans at the address provided above." This question is relevant as the NEPA Pilot Program is scheduled to end in August 2012. If Congress does not extend the sunset date, the NEPA process might revert back to FHWA, as the MOU would not be valid. On the other hand, if Congress does extend the pilot program, then how does Caltrans propose to fund this Project? Its financial viability is a requirement of the NEPA Pilot Program MOU and economics is a consideration under NEPA. [40 CFR 1508.8]

6. **The NOP is too vague on probable environmental impacts.**
    a. It is true that there is no CEQA requirement to include the Initial Study and Environmental Checklist (IS) with the NOP. However, in not including the IS with the NOP, that means that all environmental categories mandated by CEQA and NEPA must be included in the Draft EIR/EIS. Various entities, including business owners and residents, at this time may not be fully aware of all the environmental parameters that need to be discussed and would not necessarily have thought to bring them up in a letter or scoping meeting, such as aesthetics, energy conservation, mineral resources.
    b. Because the public and public agencies do not know the specifics of the Project, it is impossible to provide justifiable concerns in specific environmental categories as this time.
    c. One purpose of the NOP is to help limit the size of the EIR by indicating which environmental categories are either not relevant or will have no significant impact to the environment with the construction and operation of the Project. By not including the IS, all areas of environmental issues (even if they are not significant), must be presented in the Draft EIR/EIS. Since Caltrans will be complying with both CEQA and NEPA requirements, this decision has guaranteed that the environmental documents coupled with the technical appendices will be in the thousands of pages. This goes against the spirit and goals of both environmental laws. That is why I am recommending that Caltrans revise and re-circulate the NOP to include the Project's description, include the IS with the NOP and identify the probable environmental impacts to be discussed in the Draft EIR/EIS, and whittle down the analyses to what will be the potential significant impacts of the Project.

7. **Various environmental impacts to be considered in the Draft EIR/EIS.**
    a. Under CEQA requirements, Caltrans will need to consider a variety of environmental impacts depending on the nature of the Project. Tunneling, constructing surface routes, modifying existing transit lines, and implementing other transportation system measures do not necessarily cause the same types of environmental impacts, either in magnitude or frequency. I counted ten environmental categories the NOP mentions (some of the categories are actually part of the same overall category, such as "vehicle traffic patterns" and "parking" would fall into the overall category of Transportation/ Traffic). For the record, though, here are the environmental categories that Caltrans will need to evaluate with project implementation in the Draft EIR/EIS:
        i. Aesthetics, Agriculture & Forestry Resources, Air Quality, Biological Resources, Cultural Resources (Archaeology, Historical Resources, Paleontology), Energy Conservation (see Appendix F of the State CEQA Guidelines) Geology/Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/ Housing, Public Services, Recreation, Transportation/Traffic, and Utilities/ Service Systems.
    b. Under NEPA requirements, Caltrans will have to evaluate the categories above and additionally with the following federal environmental categories:
        i. Economic and Social Conditions, Environmental Sustainability (refer to the CEQ NEPA Regulations), Environmental Justice, and Indian Trust Assets.

ii. Although not a NEPA requirement, I respectfully request that a cost-benefit analysis for the proposed Action be prepared as part of the Draft EIR/EIS. [40 CFR 1502.23]

8. **The NOP anticipates that there will be several environmental/regulatory permits required that would imply that a surface level approach to the Project will be the most likely outcome, thereby showing a bias.**
   a. The permits cited in the NOP (e.g., Section 401 and 404 of the Federal Clean Water Act) are typical for getting clearances for crossing, filling, or impacting streams, washes, and rivers. Encroachment permits are typically for access to public streets and public rights-of-way. What types of permits would be required for tunneling?
   b. If a biological opinion is required, will Caltrans apply for a Section 7 Consultation or Section 10(a) Permit under the Federal Endangered Species Act? If a Section 10(a) Permit is sought, then what areas/properties will Caltrans rely on as habitat conservation planning reserves?

9. **Alternatives are too vague in the NOP/NOI and emphasize new construction or major expansion of existing transit systems.**
   a. There is no mention of non-building, alternative and sustainable public transportation measures, such as telecommuting and vanpools relying on alternative fuels. According to the 40 CFR 1502.14(c): "In this section agencies shall: ...Include reasonable alternatives not within the jurisdiction of the lead agency." Such measures deserve a thorough analysis as a feasible alternative in the Draft EIR/EIS.
   b. The city of South Pasadena's Multi-Mode Low Build Alternative should be analyzed as a feasible alternative in the Draft EIR/EIS.

10. **Other Issues For the Draft EIR/EIS.**
   a. From a legislative standpoint and approvals by responsible agencies, Caltrans should acknowledge Assembly Bill 353 (Cedillo) in the Draft EIR/EIS. Should this bill be passed in this legislative year, then Caltrans will have to enter into agreement(s) with the city of South Pasadena and other cities prior to constructing a freeway "extension" or "gap closure" through their jurisdictions. This bill would repeal Section 100.4 of the Streets and Highway Code.
   b. Establishing the proper baseline for the environmental setting is critical. Caltrans will need to carefully consider a baseline predicated on future, post-approval conditions for its analysis of the Project's environmental impacts. [Refer to Sunnyvale West Neighborhood Assn. v. City of Sunnyvale City Council, No. H035135 (6th Dist., December 16, 2010)]. In essence, please be very specific as to what assumptions Caltrans' plans to use when establishing baseline conditions in which to analyze impacts. The wrong baseline can deeply skew the analyses of impacts one way or another.

Thank you for the opportunity to comment on the NOP/NOI. I would appreciate receiving your environmental documentation for the Project as you make it available to the public, including the technical appendices.

Sincerely,

Mrs. Delaine W. Shane
402 El Centro Street, Unit #12
South Pasadena, CA 91030

cc: South Pasadena City Council
La Canada Flintridge City Council
Antonio Rossman
Dr. James Sherman
The 710 Freeway Fighters
Sierra Club

April 11, 2011
To: Mr. Ron Kosinski
Deputy District Director
Caltrans District 7 100 S. Main St.
Los Angeles, CA 90012

RECEIVED 4/14/11

From: Mr. David Alba
Project Designer GRID Project
davidalba1@gmail.com
TEL (626)513-3650

RE: Submission of Demand for Study Involving The Gabriel River Infrastructure Development (GRID) for Consideration as an Environmentally Superior Alternative to the Current Proposal of the Gap Closure Involving the 710 Freeway and for Inclusion within the EIR/EIS process.

Dear Sir,

The GRID Project is a regional solution to urban transportation being brought forward as an alternative solution directly obviating the need for the proposed tunnel project currently under consideration. Additionally, the GRID Project seeks to serve as an alternative to; 1) the need for widening the 710 freeway corridor from the Southern California Trade Gateway; 2) both Intermodal Container Transfer Facilities currently proposed by the Burlington Northern Santa Fe and Union Pacific Railroads; and 3) additional port expansion projects involving container terminal and on dock facility developments at both Ports of Los Angeles and Long Beach.

It is our position that all six of the above mentioned projects are linked by the necessity of expanding capacity of goods movement through the ports. We anticipate that Metro's position is that goods movement and the 710 Tunnel are not linked. This point of contention should not immediately dismiss our demand for consideration. THE PROBLEM is freeway auto and truck traffic congestion throughout the entire overburdened regional freeway system network in the East Basin of Los Angeles County, regardless of the source and destination of that traffic.

GRID seeks to find a solution different from the 710 gap closure approach and freeway expansion projects like it. To facilitate continued freeway traffic by creating yet another arterial connection is akin to a bypass operation for a morbidly obese heart disease patient. These procedures continue to enable and facilitate the patient to continue eating double bacon cheese burgers and drink sodas by the liter (more cars more trucks) so as to find himself in the same life-threatening condition literally within months of the procedure being completed. In this case, we are essentially healing the obese patient by adding yet another hole to his belt. His quality of life is not improved by these methods.

GRID seeks to put the entire region's freeway network on both a diet and on an aspirin regimen to greatly reduce the high traffic circulation pressure throughout the regional freeway networks from the ports through the entire Southern California basin, including Los Angeles, Riverside, and Orange Counties. GRID goes further to exercise the population's transportation habits by using new modes and methods of 21st century mobility to improve the quality of life for these commuters in the form of comfort, efficiency, and thrifty cost savings to their personal and family budgets.

The central focus of GRID in relation to impacting freeway traffic begins with port modernization. GRID proposes that millions of trucks currently delivering containers to and from the ports via the funneling

710 freeway could be delivered by an electrified rail platform connecting both ports of Los Angeles and Long Beach to the Inland Empire without clogging any freeway surface whatsoever. Furthermore, port modernization would continue to eliminate several million additional short-haul truck deliveries to and from the inland Intermodal Container Transfer Facilities (ICTFs) in the City of Commerce, again via the 710 freeway.

GRID seeks to utilize rights of way at or adjacent to the San Gabriel River corridor using freight pipeline technology. Moving the Ports' freight containers underground forever eliminates the coexistence of humans above ground with those containers and the vehicles used to carry them. This change will create tremendous improvements in quality of life, including: 1) reduced physical dangers associated with the proximity of cars to tractor-trailers; 2) reduced noise of vehicles moving freight; 3) significantly reduced truck traffic impact and wearing on freeway surfaces; 4) significantly improved air quality by removing the diesel fumes of more than 200 million truck-miles per year; and 5) reduced national dependence upon imported oil because the container freight pipeline will run on domestically-produced electricity.

Also included in GRID is the development of a mass transit line from the San Gabriel Mountain foothill cities of Azusa and Irwindale/IH-210 to the Pacific shores at Seal Beach. The commuter line is to be installed in the same rights of way as the freight pipeline on or adjacent to both the San Gabriel River and the 605 freeway. Like the 710 Freeway, the 605 is a north to south freeway. It is a most critical freeway artery bisecting the entire east basin of Los Angeles County. The 605 freeway acts as a spine intersecting the 22, 405, 5, 91, 105, 60, 10, and 210 freeways. All with the exception of the 210 and 22 freeways intersect with the parallel IH-710. The average distance between the 605 and 710 is less than 8 miles.

A San Gabriel River Light Rail Commuter line mimics this critical transportation route for millions of potential commuters. However, where the commuter rail line goes beyond the 605 freeway potential is that this rail line intersects with all Metro, Metro Link, and Amtrak routes North East, East, and South East of downtown Los Angeles. This creates an exponentially improved number of point-to-point destinations provided transfer stations were to be developed at these intersections. The potential ridership at all Metro, Metrolink and Amtrak intersections COMBINED with the perfect parallel of the 605 freeway creates potential ridership opportunity for literally millions of commuters within close proximity to these rail networks. Most important is that all roads (commuter rail lines) no longer lead to Rome (DTLA). This new commuter rail opens opportunity for Metro and Metrolink lines to serve thousands of new point to point destinations outside the immediate Los Angeles vicinity. If ridership from all Metro and Metrolink systems were to substantially grow as a result of this new rail line, it would have a direct impact on automobile freeway use on all freeway networks listed above. To have a direct impact on the 605 is to have a direct impact on the 710 freeway in that the intersecting freeways are so closely parallel to one another combined with massive reduction flows of trucker traffic also impacting these same freeway networks. These factors make GRID a worthy study for closer examination.

The opportunity to create a rail network and develop transfer stations at the San Gabriel River Route creates exciting green development opportunities in transportation, quality of life, and natural development infrastructure on a greenbelt area of land spanning 30 miles and many thousands of acres. The transportation infrastructure installation will open the door to billions of dollars to be invested in massive mixed-use green urban village developments plus conversion of the San Gabriel River from a boulder-lined ditch to a revitalized and beautified river. These developments in mixed use green development go on to create tremendous tax based revenues for the region, spawning sustainable jobs, all emanating from these new transit developments.

These developments further open the opportunity for a pure cycling and pedestrian surface transportation network to feed into the underground transit system further motivating Transportation Oriented Development (TODs). The recent and tremendously successful CicLAvia event held just this past week in Los Angeles is a clear affirmation of our community's desire envisioning genuine car-free bicycle centric multi-mile greenbelt developments whereby a genuine CicLAvia transportation and linear green village mixed use network could be developed and positioned upon this vast 30 mile platform.

This letter of demand for consideration and study of the GRID project should be welcomed by our transportation authorities. Moreover, the GRID project should be of interest to the many of our **LOCAL** skilled construction and manufacturing companies currently supporting the tunnel project in that GRID would provide much larger contract awards requiring many more of the same industries and skill sets far exceeding those from a 4.5 mile tunnel project. GRID will likely require several times more key materials than the tunnel project would require and is many times more labor intensive in scope. This multi-year project is estimated to require jobs in the hundred thousand range for our region.

American companies and many thousands of fellow America workers from many states beyond California contributing in vast manufacturing, fabrication, construction, and engineering services GRID will ultimately be required firmly qualifying GRID as a Project of National Significance.

We would appreciate an opportunity to submit additional information and arrange presentations of the GRID vision project to your executive staff and Board of Directors at your soonest convenience.

Thank you for your consideration.

Always Looking Forward,

David Alba

Project Designer GRID/ECSTC Systems

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:29 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: Scoping Comments re Proposed 710 Freeway Extension

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:29 PM -----

David Czamanske <dczamanske@hotmail.com>

04/13/2011 09:22 PM

To <ron_kosinski@dot.ca.gov>

cc

Subject Scoping Comments re Proposed 710 Freeway Extension

SCOPING COMMENTS REGARDING PROPOSED 710 FREEWAY EXTENSION, NORTH END

The proposal to build a 710 freeway extension, whether above or below ground, is based on several illusions:

1. The ILLUSION that such a project will reduce traffic congestion. THE LIKELY REALITY is that if a freeway link is built, it will initially attract additional vehicles to this corridor to the extent that it will create large-scale traffic congestion and reduced speeds the day it opens. The LIKELY RESULT is that drivers will seek alternative routes, ie, surface streets, to avoid the congestion, just as they now do to avoid congestion on freeways, including both the 10 and 210, throughout Southern California.

2. The ILLUSION that public funds may be available in the near or even more long-term future to build a freeway extension. The LIKELY REALTY is that neither the Federal nor the State government will have significant funds, or be willing to commit significant funds, for this project due to the severe budgetary constraints the nation and the state are experiencing and will continue to experience into the foreseeable future. The Obama Administration desires to commit sizable funds for high-speed rail - whether it will be able to do is uncertain. The LIKELY RESULT is that a project of this type is likely to be very low on any Federal transportation priority list.

3. The ILLUSION that private enterprise will come to the rescue to play a major role in funding this proposed project. The LIKELY REALITY is that such funding will not happen. Private enterprise needs profits to participate, and this project is unlikely to be profitable for the basic reason citied in Point 1 above. A significant toll (estimated to be in the $5 - $25 range) would be required to generate a profit. However drivers will pay a toll only to save time and congestion; they will not pay a toll to sit in congested traffic, especially if they are in a tunnel. The LIKELY RESULT is that drivers of passenger

vehicles will be strongly motivated to avoid the toll and congestion and will seek relief by traveling on surface streets. Drivers of corporate-owned trucks may be willing to pay a toll, no matter what it is, especially since they are not allowed on many surface streets, but the hoped-for illusion that commuters will pay significant tolls to drive on such a toll road through a tunnel is just that: an illusion. (Note the tepid use of the Orange County toll road system, even before the current recession; use of that system has declined significantly since the recession, as described in a recent LA TIMES article.)

4. The ILLUSION that there will be sufficient traffic on a toll link in this freeway extension to repay costs financed by private enterprise. The LIKELY REALITY is that, though a freeway extension, if constructed, will be initially congested for the reasons stated above, the number of vehicles utilizing it will be insufficient to meet privately financed construction costs, with the LIKELY RESULT that the toll authority will be faced with a decision of either (a) increasing tolls, which may very well result in even less traffic and revenue, or (b) asking public agencies for a financial bailout, and/or (c) declaring bankruptcy. (The Orange County Toll Authority has had to face these very same hard choices.)

In summary, all freeway extension proposals presently offered are based on illusions, not reality. To ensure that the EIR for these proposals is complete, all of the above anticipated contingencies need to be fully analyzed in the environmental review process.

Please enter these comments on the official record of the scoping process for this illusionary project.

David Czamanske
PO Box 3572
South Pasadena, CA 91031

3308 Danzig Place
Alhambra, CA 91803
11 April 2011

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

received
4/14/11

Dear Mr. Kosinski,

As a Alhambra homeowner, I am writing to encourage a decision to compete the 710 freeway extension to Pasadena and the 210. This project has been held up in the courts for many years and traffic congestion in the basin has suffered. This is a regional issue rather that just a S. Pasdena issue. Other communities have had to make adjustments to accommodate the 105, others have had to adjust to Metro gold line. Some people have to live next to LAX, others next to the ports, still others live next to Hyperion and others next to petro refinery and jails and trash transfer stations and Dodger Stadium, Rose Bowl, LA Live, etc. Alhambra is cut by the 10.

With rising gas prices, it is important that CAL DOT reduce congestion which waste gas and increases pollution with idling vehicles just creeping along. I live near the completed 710 just where it ends at Valley. On congested days where traffic has backed into the freeway it has taken me 30 minutes of creeping just to get to my home. The current design of the temporary end of freeway is silly: it bottlenecks from three lanes to two lanes and back to three lanes at the Valley traffic signal.

If the 710 cannot be completed as originally planned, I strongly recommend the 710 be completed through right of way Caltrans may already own. This is likely to be several blocks N of Valley but still short of S. Pasadena. Instead of dropping all N bound 710 traffic onto Valley and Fremont, how about a extension with some traffic drops off to Mission? Mission is just one block N. of Valley and the 710 right of way to Mission appears to be in place. This would seem to be small project to get funding and would make a big Valley / Fremont congestion improvement. Let's not wait any longer so we have to pay higher construction costs of the future and let's get that vacant Caltrans right of way serving the public.

Respectfully,
Cliff Weinan
cliff weinan

Ron Kosinski/D07/Caltrans/CAGov
04/15/2011 12:28 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT
cc
bcc
Subject Fw: 710 extension scoping study

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:28 PM -----

Cindy Wilcox <thewilcoxfamily @earthlink .net>
04/13/2011 08:32 PM

To <Ron_Kosinski@dot.ca.gov>
cc
Subject 710 extension scoping study

Cindy Wilcox
4408 Union Avenue
La Cañada, CA 91011
(818) 952-0345, home
thewilcoxfamily@earthlink.net

April 13, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 Main Street, MS 16A
Los Angeles, CA 90012
email: Ron_Kosinski@dot.ca.gov

RE: 710 Extension Scoping Study

Dear Mr. Kosinski,

I demand the scoping study include La Cañada and La Crescenta. Particulate matter, sulfur compounds and nitrogen compounds must be thoroughly studied and reported out.

In addition, please study and report on the option to move cargo by rail. While the diesel fuel used in train engines can be polluting, four engines can haul 100 cars with double-decked cargo containers. This is great deal of cargo as compared to trucks. The rail option must be considered.

Thank you acting on these issues.

Sincerely,
Cindy Wilcox

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street Mail Stop 16A
Los Angeles, CA 90012

received 4/8/11

Dear Mr. Kosinski,

RE: SUPPORT FOR THE 710N GAP CLOSURE PROJECT AND COMMENTS FOR ENVIRONMENTAL REVIEW

This writing is being sent to you so we can be on the record on the 710N Gap Closure project. We support a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed NOW.

Please include the following in the environmental analyses:

- The Gap has been in existence for nearly 40 years creating much confusion for drivers; let's fix this! The EIR should show how all freeways and major roads in the area in four directions will benefit from the closing of the gap.
- Air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved; the EIR should demonstrate both of these aspects to show actual project benefits.
- Our commutes will be easier and take less time to go to work and come home; the EIR should take into account how closing the gap improves the quality of life for many people.
- Jobs will be created during these tough economic times; the EIR should detail how the project helps our economy in creating jobs and in other ways such as the benefit to the tourism industry; for example, visitors to Los Angeles will actually be able to reach their destination when using the 710N freeway instead of being routed off through local communities.

Please continue the environmental process with all due speed. Remember we voted, along with 2/3 of all Los Angeles County voters, for Measure "R" that calls for the 710N Freeway to be completed.

We cannot wait another 40 years for this project to become a reality.

Sincerely,

Chris Paulson

Chris Paulson
303 W. Linda Vista Ave., #17
Alhambra, CA 91801

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
CalTrans District 7
100 South Main Street Mail Stop 16A
Los Angeles, CA 90012

received
4/12/11

Dear Mr. Kosinski,

RE: SUPPORT FOR THE 710N GAP CLOSURE PROJECT AND COMMENTS FOR ENVIRONMENTAL REVIEW

This writing is being sent to you so we can be on the record on the 710N Gap Closure project. We support a tunnel or a surface route extension connecting the 710N to the statewide freeway system at Interstate 210. It is imperative this connection be completed NOW.

Please include the following in the environmental analyses:

- The Gap has been in existence for nearly 40 years creating much confusion for drivers; let's fix this! The EIR should show how all freeways and major roads in the area in four directions will benefit from the closing of the gap.
- Air quality will be substantially improved in the entire basin; and existing areas suffering from adverse health impacts will be relieved; the EIR should demonstrate both of these aspects to show actual project benefits.
- Our commutes will be easier and take less time to go to work and come home; the EIR should take into account how closing the gap improves the quality of life for many people.
- Jobs will be created during these tough economic times; the EIR should detail how the project helps our economy in creating jobs and in other ways such as the benefit to the tourism industry; for example, visitors to Los Angeles will actually be able to reach their destination when using the 710N freeway instead of being routed off through local communities.

Please continue the environmental process with all due speed. Remember we voted, along with 2/3 of all Los Angeles County voters, for Measure "R" that calls for the 710N Freeway to be completed.

We cannot wait another 40 years for this project to become a reality.

Sincerely,

Aram Vartivarian
3844 Inglis Dr.
Los Angeles, CA 90065

RECEIVED 4/26/11

William D. Sherman, MD

320 Grand Avenue

South Pasadena, CA 91030

April 23, 2011

Ron Kosinski

Deputy Director

Division of Environmental Planning

Caltrans District 7

100 S. Main street, MS 16A

Los Angeles, Ca 90012

Dear Mr. Kosinski,

RE; SR-710 Environmental Impact Report/ Scoping Request.

I am making a request that the EIR/EIS performs a comprehensive disaster plan so that the impact on the public in a disaster can be quantified. What is the effect of the tunnel in the disaster planning and management of people in South Pasadena?

The proposed tunnel is vulnerable to natural and manmade disasters. Under natural disasters we include earthquakes. The Geotechnical Study assured us that the tunnel would withstand a major earthquake. When questioned they meant that the tunnel could be constructed in a manner that it would not rupture during an earthquake. They acknowledged that drivers within the tunnel would experience marked motion and that this motion could result in traffic accidents and even a possible tunnel fire. If there were a tunnel fire would the area adjacent to the Huntington Memorial Hospital, the site of the Northern Ventilation Building, be made uninhabitable due to toxic fumes from the fire? The entire San Gabriel is dependent on this Hospital for emergency care. It would be unacceptable to lose this asset during and after an earthquake.

Manmade disasters include traffic accidents and terrorist attacks. Two drums of Diesel Fuel set off in the tunnel in both the North and South roadway could kill and injure thousands of people. There will be many trucks using this roadway and some of them will be carrying material that burns vigorously. The Mount Blanc Tunnel fire in Europe involved a truck carrying margarine!

Will there be the egress of toxic fumes at the midpoint ventilation tower? Will there be other venting portals along the pathway of the tunnel and will these too be expelling toxic fumes if there is a fire.

What are the security measures and safety measures being set up for the tunnel? Are there to be other exits from the tunnel other than at either end? Are there to be "safe" rooms within the tunnel? Is there to be a sprinkler system within the tunnel to extinguish fires?

Will the Huntington Memorial Hospital be equipped to provide ventilator support to multiple patients suffering from the inhalation of toxic fumes? Will the HMH be able to take care of multiple burn patients?

Will the Cities along the route be expected to provide emergency care to victims within the tunnel? If there is an earthquake will the firefighters and emergency people of my city be off saving people in the tunnel and abandoning the people of my city?

Yours truly,

William D. Sherman, MD

Carol Teutsch, M.D.
841 Moon Ave
Los Angeles, CA 90065
cbteutsch@comcast.net
April 1, 2011

Ron Kosinski
Deputy Director
Division of Environmental Planning
CalTrans District 7
100 S. Main St., MS 16A
Los Angeles, Ca 90012

SCOPING COMMENTS ON 710 TUNNELS PROJECTS

Dear Mr. Kosinski,

I am asking for a clear purpose and need statement for the project which has *remarkably* still NOT been provided to the public after **numerous** inquiries.

> The framing of the question is critical so that one can look broadly at the regional transportation demands and consider alternatives and transformative transportation solutions in light of available funds. When a project is so large, so disruptive and so costly to the public it should have a thorough and transparent vetting of the process. The process thus far has been very muddled raising the question whether some group or groups will disproportionately benefit from building a tunnel. We have been told the project is for congestion. From current information from SCAG, now an outdated report with no newer traffic analyses publically available, a tunnel would open as an F. We have been told the tunnel is for cargo, but a regional cargo plan from the port to a final destination has not been part of this discussion because the projects have inappropriately been divided. Many questions remain whether a tunnel is even a viable option, and certainly it is not clear if it is a best solution for cargo when looking at alternatives.
>
> When Metro/Cal Trans (March 2011 in public forum) said that not allowing trucks might be a mitigation response I am even more baffled. Many preceding documents in the public domain lead us to strongly believe trucks and cargo are key drivers for this project.

I am asking for full cost accounting. There is considerable reason to believe that the true costs of the tunnel make this project non-viable. The question in this era of severe financial constraints should be around what can and should we invest in infrastructure, and then what are the best investments. Something else besides logic is driving this process. Trying to build an 11-14 billion dollar tunnel of uncertain need while cutting bus routes is very worrisome, especially in an era when the growing wisdom is focused on public transit. (LA TIMES March 25, 2011 “MTA BOARD OKs deep cuts in bus service”).

I am also very displeased with the lack of transparency and in fact lack of accuracy of cost estimates for this project despite multiple requests. We know that the latest estimate submitted to METRO is clearly an underestimate because of obvious omissions and comparison to other tunnel projects. The PPP raises questions about ultimate public accountability if a toll road does not produce adequate revenues for investors. There is also tremendous murkiness about responsibility for liability for adverse impacts on health, unexpected problems in construction and horrific accidents in the tunnel.

Unfortunately such a project is at high risk for corruption, again ultimately putting taxpayers at risk e.g., our college campus construction problems, the BIG DIG in Boston, problems with the red line, none of which builds confidence. We want a full open accounting of those who are lobbying and bidding for contracts and all those who are likely to get positions because of tunnel support. We want clarity around who will be in charge of assuring quality of the project as it is constructed.

We are asking for QUALITATIVE AND QUANTIFIED ASSESSMENTS of the following topics:

There are a number of new and forward looking reports that lay out **principles** for major infrastructure projects, particularly relating to transportation. The EIR for the 710 should take these into consideration and directly address them.

How does the 710 tunnel proposal fully address **California's Strategic Growth Council** new guidance of **Health In all Policies** (HiAP Task Force Dec 2010)?

The Task Force was charged with identifying "priority programs, policies, and strategies to improve the health of Californians while advancing the goals of improving air and water quality, protecting natural resources and agricultural lands, increasing the availability of affordable housing, improving infrastructure systems, promoting public health, planning sustainable communities, and meeting the climate change goals".
http://www.sgc.ca.gov/hiap accessed March 11,2011
http://www.sgc.ca.gov/hiap/docs/publications/HiAP_Task_Force_Report.pdf accessed March 25, 2011
This policy indicates that addressing public health and health equity issues should be a critical part of decision making, with a collaborative approach of a wide array of stakeholders with innovative solutions across silos. Environments, such as air quality, affect health directly. Elements of a healthy community are defined. Health in all policies has been applied outside of the United States since 1986. It is time we move in this direction so we find the best, most sustainable all around solutions.

How does the proposal address the **Prevention Institute** report on **TRANSPORTATION PRESCRIPTION** (www.convergencepartnership.org/HealthyEquitableTransport)
http://www.convergencepartnership.org/atf/cf/%7B245a9b44-6ded-4abd-a392-ae583809e350%7D/HEALTHTRANS_FULLBOOK_FINAL.PDF accessed March 27, 2011 which states 4 principles as benchmarks to assess impacts of transportation plans on public health, equity, and environmental quality?

1. Develop transportation policies and plans that support health, equity, and environmental quality.
2. Prioritize transportation investments in distressed region, low-income neighborhoods and communities of color.
3. Emphasize accessibility, instead of simply mobility, in transportation policies and programs at all levels of government as well as well as across sectors and policy silos.
4. Ensure transparency, accountability, and meaningful participation by residents, advocates with diverse interest, and experts from different fields.

A very nice and recent example of integrating public health objectives in transportation planning can be seen in an independent research report from the Victoria Transport Policy Institute (www.vtpi.org) (http://www.vtpi.org/health.pdf accessed March 27, 2011). It clearly outlines health damaging effects with transportation such as traffic accidents, air pollution exposure, noise pollution exposure, stress and anxiety, constraints on active transport modes, constraints on outdoor space and financial cost burdens. Traffic deaths per capita tend to decline with increased per capita transit ridership. Vehicle pollution health impact is covered, pointing out the impact on premature death and the problems associated with rising vehicle travel, which has counteracted much of the reductions in emission technology. It is a model I would like incorporated in the EIR analyses. "…giving greater priority to health objectives in transport planning….." would lead us to different solutions and outcomes than if we take a transportation centric view.

The tunnel project presents some unique concerns not seen with surface routes.

There is a need for both an **HIA (Health Impact Assessment)**and **HRA (Health Risk Assessment)** related to such a massive tunnel for vehicular traffic through earthquake zones because of known and unknown risks. The health risks being assessed should include but not be limited to asthma, vascular disease, cancer including brain tumors, diabetes, and loss of lung function. It should include monitoring of children and the elderly as well as adults of various ages. The bibliography and list of issues in the appendix should be used to expand the specifics I am seeking assessment for.

- What type of **ongoing air quality monitoring** would be continuously(or a frequency which needs to be specified) provided inside the tunnel, at the portals and at the vents at PEAK concentrations-- not off peak data. What **sensitive receptor sites** would be near (within 500 feet to 1.5 miles based on scientific literature) of the portals and the vents (when the path is finally openly shared with the public)? Sensitive sites should include but not be limited to schools, day care centers, hospitals, elder care settings (e.g. convalescent centers, senior centers), hospitals, residential areas, and parks and recreation sites.
- We would expect monitoring for all sizes and kinds of particles (PM), including ultra fine and nano particles, carbon black (organic carbon and elemental carbon), and degradation of road products and tires and brake linings and diesel catalyst decay products (including but not limited to metal particulate emissions, strontium, and a variety of organic compounds) all of which can have adverse health impacts.
- Nitrogen oxides (NOX) and nitrogen dioxide (NO_2)
- Ozone
- Carbon monoxide (CO)

What are the technical specs for this monitoring and what are the costs? What is the assurance that monitoring will continue indefinitely? We want a plan fully explored and costed out.

What is the impact of trucks from other countries such as Mexico where regulatory standards are different? What about trucks that don't meet the clean truck standards for combustion?

What are the ongoing expenses to run the ventilation system and maintain it? We understand that sometimes ventilation systems are turned down or off as cost saving measures and that running this system could run into a million dollars or more a day. What kind of assurance and protection would we have against this?

Different technical solutions exist for cleaning exhaust before releasing. What are the technical efficiencies of what will be used and accounted for in the cost of the tunnel? What types of pollutants would not be treated with these ventilation systems? What types of pollution would be incompletely treated?

At the typical highway speeds (5-15 miles per hour not uncommon), how long would one typically be in a nearly 5 mile tunnel? This information would then inform models of typical commuter exposure to the very concentrated pollutants reported in tunnels and consequent health effects. What if one were stopped in a tunnel for an accident? What are the safe exposure times?

What provisions are made for safety and hazards? Traffic accidents? What would happen in an earthquake? In a power failure? What are the specific hazards related to tunnel slope and concentration of contaminants spilled ? Information on tunnels gives examples of horrifying accidents, scenarios worsened by the tunnel. We would want some internal safety stations and rescue capability within this long tunnel as well as frequent emergency escapes. What provisions would be made for handicap escape? Please define what would be included in any plans.

kuykendall paustenbach tunnel r

Larsson airway effects tunnels Resp

Please note there is a sponsor with commercial interest for one of these articles so bias should be taken into account.

What mitigation strategies for noise, air pollution, vibration,light pollution, proximity to sensitive sites will be put in place during the extended period of construction?

There is impact on health from noise and light pollution and tunnel ventilation shafts can change neighborhoods and obstruct views. Once the tunnel is operational, how will noise and light pollution be controlled?

What standards for pollution by construction vehicles and heavy machinery will be applied to this lengthy project? How long will this project take? How will that timeline be legally enforced?

There is a general plan for the county under active consideration with proposals for <u>no sensitive users</u> within at least 500 feet and perhaps 1500 feet of a freeway which will be in effect by the end of the EIR

and well before construction. Please provide evidence that this has been carefully considered in the plans.

How will building this tunnel affect overall air quality in the region and will it have an impact on LA missing the federal standards it needs to meet? I am not satisfied with the glib statements that have been provided by the agency on this issue including in their written materials without updated data and new specific studies. Collaborative and early consultative work with AQMD and EPA who are interested in zero polluting options is critical for the EIR model and input, not just for the comments at the end of the process.

There is concern about whether trucking is an appropriate choice for cargo transport and inappropriately subsidized by not accounting fully for externalities. The new GAO Report GAO-11-134 showed that " on average, additional freight service provided by trucks generated significantly more costs that are not passed on to consumers of that service than the same amount of freight service provided by either rail or water." This report puts an additional burden on the EIR to consider alternatives such as rail and appropriately include consideration of all externalities.
(Full report at http://www.gao.gov/new.items/d11134.pdf)

d11134high.pdf

The health impact of truck traffic is enormous on communities and must be counted in the assessment. Please refer to the extensive scientific work and community work done as part of THE IMPACT PROJECT http://hydra.usc.edu/scehsc/web/index.html accessed March 29, 2011.

Multimodal solutions and transit options need extensive consideration in the EIR as do rail and non/low polluting options for cargo. Redirecting the funds for this project to multimodal solutions can significantly improve quality of life in communities and creates more local jobs than massive infrastructure projects. Transit projects should be considered in terms of the health benefits and other externalities they bring to community life as well as for equal access for mobility. The social justice equity needs to be considered because substantial tolls are planned which may create an inequity for commuters to work who can and cannot afford the tunnel.

Transit projects are generally much better aligned with leading current thinking about transportation than are massive freeway projects.

The likely possibility of traffic diverting from the tunnel into communities should also be considered and modeled, including diesel exposure, noise, proximity to schools and parks, etc.

Detailed consideration of a broad array of **externalities** is a critical aspect of the comparative options analysis that must be provided to the public.

The federal transportation bill is up for reauthorization. Transportation for America has carefully thought out principles for the future decision making for transportation where a huge number of dollars go. Outcomes based and green themes are prominent. Higher proportion of investments in transit is recommended along with multimodal options and more complete options. Pointing out the need to assure safety for all transportation users and **improve** public health outcomes appears in the objectives.

http://t4america.org/blueprint/ accessed March 29, 2011

Tunnel construction has been associated with worker accidents and illness. What are the worker risks and costs of injuries and loss of life or lifetime disability. These are externalities that need to be figured into the costs.

A new publication from USC and Occidental provides a nice framework which should be included in your considerations:
http://departments.oxy.edu/uepi/Global%20Trade%20Executive%20Summary.pdf

A new document from the Institute of Medicine on the Leading Health Indicators for Healthy People 2020 has just been released. Pollutants and Air Quality Index (including measures of ground level ozone, particle pollution (particulate matter), carbon monoxide, sulfur dioxide and nitrogen dioxide) is in the list of indicators which is directly linked to adverse health effects for all and health goals for the nation. The text also refers to the HHS National Prevention and Health Promotion Strategy that includes an objective to reduce physical and chemical contamination of our earth.
http://www.iom.edu/Reports/2011/Leading-Health-Indicators-for-Healthy-People-2020.aspx accessed March 29, 2011.

There is an increasing body of research that begins to put costs on air pollution, costs to human health and financial burdens on society. RAND, an independent research institute, did some cost analyses of the impact of failing to meet federal air quality standards to purchasers and payers of hospital care in California over 2005-2007. They took into account ER visits for asthma and hospitalizations for respiratory and cardiovascular causes. Much of this burden would fall on Medicare and Medicaid, public programs supported by tax dollars. http://www.scpr.org/news/2010/03/03/rand-study-says-air-pollution-tab-hospitals-193-mi/

http://www.rand.org/pubs/technical_reports/TR777.html

http://www.rand.org/content/dam/rand/pubs/technical_reports/2010/RAND_TR777.pdf (accessed March 30, 2011. EPA has put forth stricter smog standards which have a national price tag estimated at $90 billion dollars but cleaner air could save $100 billion dollars in health costs over time. California, with some of the worst air pollution in the nation, can attribute about 19,000 premature deaths per year to air pollution with ozone and particulates.

http://www.scpr.org/programs/airtalk/2010/01/07/epa-proposes-new-stricter-smog-limits/ accessed March 28, 2011.

This is not a simple issue but it is important and the right decisions are CRITICAL to our survival in this region. I am asking for very thorough **health** assessments across significantly different alternatives (and not some meaningless alternative comparisons) using scientific methods that are up to date. We could lead the nation by using independent scientists and public health leaders to help us come to the right decisions.

We cannot solve big city problems in silos with "tunnel vision" goals. I want to see health as a primary consideration in the way we solve our transportation issues, solutions that justly serve the whole population of our region. Everyone's health is at risk if we don't get it right.

No 710 Action Committee

7 April 2011

Ron Kosinski, Deputy Director
Division of Environmental Planning
Caltrans – District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

Re: Deficit Route 710 Scoping Session

Dear Mr. Kosinski:

No 710 Action Committee is a coalition of community groups throughout Southern California opposed to wasteful expenditures and defective environmental analysis that have characterized the debate over the Route 710 project for the past fifty years. Because of the federal court injunction against any surface route, if a surface route is proposed by the Metropolitan Transportation Authority ("Metro"), the so-called "scoping" of the next EIR/EIS on the Route 710 must be reformed. If the surface route is contemplated, the "scoping" process must include NEW 2011 analysis for historic properties, air quality, the Multi-Mode Low Build alternatives, and a high level financial analysis. Otherwise, issues cannot be "flagged" in the manner required by CEQA and NEPA.

1. 1999 Preliminary Injunction Determined The 1993 Caltrans EIR/EIA Analysis Was Legally Defective

In 1999, the U.S. District Court in Los Angeles determined that the 1993 Caltrans EIR/EIS for the Route 710 surface route freeway proposal was legally defective and violated both CEQA and NEPA. See, **City of South Pasadena v. Slater (C.D.Cal. 1999) 56 F. Supp.2d 1106.** It appears that Metro's "scoping" process for the potential future environmental studies may contain improper reliance on the defective 1993 EIR/EIS and the incomplete and defective analysis conducted for that document over eighteen years ago. Such reliance would violate both CEQA and NEPA. Caltrans and the federal government failed to appeal the 1999 preliminary injunction when they had the right to do so. All determinations in that case are final and binding on Caltrans and the Federal Highway Administration. Metro's proposed reliance on any of the outdated and defective 1993 analyses would be not only illegal, violating the 1999 injunction, but fundamentally wrong.

2. Defective 1985 Historic Resources Analysis

The "scoping" for the "gap closure" EIR/EIS must start with a complete NEW historic properties inventory of the various Route 710 proposed routes. Over twenty-five years has elapsed since the Caltrans 1985 historic inventory. Twenty-five years of more neglect and improper rehabilitation by Caltrans have rendered the prior survey outdated. The passage of twenty-five years has caused hundreds of other structures to become historic by passing the fifty-year age threshold. Scoping cannot "flag" environmental issues without a new historic properties inventory. Scoping itself must include a new historic resources inventory.

3. Defective 1992 Air Quality Analysis

The air quality analysis in the 1993 EIR/EIS is outdated and legally defective. The "scoping" process must include an ENTIRELY NEW air quality analysis before the "scoping" process commences. The eighteen years that have passed since the 1992 air quality analysis have rendered that analysis wholly irrelevant to today's conditions. Federal law requires particulate analysis to PM 2.5, but the 1992 regulation only required the less

rigorous PM 10. Reliance on prior air quality analysis would violate CEQA and NEPA. Scoping depends on a new air quality analysis to "flag" issues under the current regulations and environment. Scoping itself must include a new air quality analysis.

4. <u>Defective 1992 Analysis of Multi-Mode Low Build Alternative</u>

The 1993 EIR/EIS contained no analysis of the Multi-Mode Low Build ("MMLB") alternatives proposed by South Pasadena and others. A separate MMLB report done by Caltrans was rejected by the 1999 injunction. The "scoping" must first include a complete analysis of the MMLB in order to comply with CEQA and NEPA. Otherwise, the "scoping" will be unable to treat the MMLB as an alternative or be able to "flag" all potential environmental benefits associated with the MMLB. Scoping itself must include a full MMLB analysis.

5. <u>Detailed Cost Analysis Must be Included</u>
<u>To Determine if Mitigation Measures Will be Too Costly to Undertake</u>

The 1999 injunction found that a project financial analysis is key to understanding the environmental impacts. The judge cited **Title 23, United States Code, section 134(h)(2) and Title 23, Code of Federal Regulations, section 450.324**. In addition, the Federal Highways Administration ordered Caltrans to perform the financial analysis in the 1998 Record of Decision ("ROD") and again in the 2003 ROD rescission letter. Metro is acting with and under Caltrans and therefore bound by these prior decisions, laws, and administrative directives.

The 1993 EIR/EIS failed to include any cost analysis. The feasibility of the project directly involves mitigation measures related to air quality, historic resources, groundwater impacts, long-term seismic risks, and liquefaction risks due to groundwater. If the overall project is not financially viable, added environmental mitigation measures could be needed after construction commences. Thus a high level and detailed financial analysis must be completed as part of "scoping" under federal law. The Orange County Transportation Authority recently abandoned a proposed Orange County/Riverside tunnel proposal when it became clear before "scoping" that it was not financially viable ---- No tolls would be generated during years of construction, but debt service would be required from the first borrowing of billions. Other environmentally useful transit projects could be sacrificed and added environmental impacts created due to the lack of financial viability of the 710 project. The "scoping" needs detailed financial analysis to enable the process to "flag" all environmental issues in each alternative. Without cost and financial analysis the various alternatives cannot be analyzed during "scoping" to balance the costs and benefits of each alternative project.

<u>Conclusion:</u>
<u>The Metro Scoping Process is Illegal and Dishonest</u>

Based on the possible reliance on defective, incomplete, and outdated analysis in the 1993 Caltrans surface route EIR/EIS, and the lack of any financial analysis, Metro's Route 710 "scoping" process could violate both CEQA and NEPA. Metro must not undertake the "scoping" until the process of "scoping" is legally compliant. Otherwise "scoping" would be illegal and possibly violate the 1999 federal court injunction. All errors identified in the injunction must be corrected as part of Metro's "scoping" process.

Sincerely,

Joanne Nuckols

Claire W. Bogaard

C.T. Williams
4117 Barrett Road, LA 90032-1712,
323-528-9682, ctwilliams@yahoo.com

RECEIVED 4/14/11

SCOPING COMMENTS

also submitted online

All comments for Scoping of SR-710 Gap Closure from MTA/Caltrans are sent:
Ron Kosinski, Deputy District Director, Division of Environmental Planning
Caltrans – District 7, 100 South Main Street, MS 16A, Los Angeles, California 90012
Email: **Ron_Kosinski@dot.ca.gov**

The Comments below reflect resolutions and concerns expressed by the following organizations:
LA-32 Neighborhood Council Board of Directors and Stakeholders
NELA Coalitions of Neighborhood Councils (total nine)
Stop710 Coalition (NELA City Coalition)
LA Red de El Sereno (Eastside Café)
Sierra Club, Angeles Chapter, Transportation and Conservation Committees

SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Scope of Works for Consultant - Scoping Report

Background for Comments:
Review of the RFP from MTA and administered by Caltrans (CTs) for the current Scoping indicated three primary objectives:
development of a **range of potential solutions**,
input on the **purpose and need** for a project
a revised **Study Area**.

The scoping sessions and others did not clearly state or provide the basis for public contributions to the scoping that was to:
develop a **range of potential solutions**,
receive input on the **purpose and need** for a project and
revise the **Study Area**.

Comments, in Italics
The EIR/EIS must include either an extended scoping period or a combined scoping and alternatives development and analyses phase prior to the initiation of preparation for the environmental setting and assessment of conceptual/early preliminary engineering of real solutions (alternatives) in EIR/EIS and responsive to the Needs and Purposes for the EIR/EIS.

The Scoping Report must provide a listing of the range of potential solutions derived from considerations given during the Series 1 sessions and through these and other comments provided for the Series 3 going on the record.

The EIS/EIR and any pre-assessment development must include and reflect the concerns and considerations of the communities presented in the Series One, March, sessions of the "Scoping".

MTA/CTs must review and revise and recirculate the needs and purposes which changed from those in the NOP/NOI to those in Series 3 Scoping sessions and differed somewhat between verbal/visual presentations and those provided to the public in hardcopies during Series 3 sessions. MTA/CTs must extend the period of Scoping and requests further purposes and needs from the Public or agencies for specific inputs to the purposes and needs for a project which must be provided in the Scoping Report and serve as the basis for Alternatives Analyses.

CTs/MTA and the Scoping Report must assemble and verify a quantitative set of needs and purposes based on Public and agencies' comments as inputs to the process.

4117 Barrett Road, LA 90032-1712,
323-528-9682, ctwiliams@yahoo.com

SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Scoping Background

As indicated above and elsewhere, the Caltrans (CTs) and MTA efforts have not been consistent, forthright, and accessible, and they created an atmosphere of distrust and suspicion. This Lack of Trust, Transparency, Info-Access, and Public Participation has focused on Low-Med Income residents and project opponents.

CTs/MTA must open the files and activities to full disclosure to any/all except for those items involved in litigation or fiduciary negotiation. All preparations of the Scoping Report, Alternative development and Analyses, and EIR/EIS preparation must be available on-line either in real-time or periodically (e.g., weekly or bi-weekly) updated status reports with links to current drafts of information and documents.

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: General Comments - Scoping Report

MTA/CTs (California Dept. Transportation) must achieve a "rigorous" EIR/EIS scoping process through use of the FTA approach rather than the more limited FHWA, which is bias to as yet undefined highway projects, surface or subsurface.

The Scoping Report must include provision for additional comments for alternatives development clarifications prior to selection of alternatives based on the final Needs and Purposes.

MTA/CTs must formally reply in writing accepting the submittal of comments on the NOP/NOI in order to assure full inclusion of comments into the process.

MTA/CTs must provide a monthly update of activities and minutes and of scheduled activities and meeting in order to achieve a "rigorous" EIR/EIS scoping process through use of the FTA process.

MTA/CTs' use of "Gap Closure" shows bias/non-objectivity. MTA/CTs must achieve a unbiased and fully objective approach for this project and use one project name – Recommend SR-710 North Extension,

The EIR/EIS must include a full presentation of the "710 History", previous RoD and its rescension , earlier EIRs/EISs, Scopings, and full Fed Injunctions and their reviews of the multimode and how these documents pertain to the existing environmental efforts and documentation.

MTA/CTs must provide accessible information on any and all environmental studies, reports, and/or impact reports and statements for any and all related projects that are underway or have been done and or completed near, and around the proposed 710 Project area and areas considered to be affected by the "Gap Closure".

MTA/CTs must provide for Steering, Technical, or Community Committee(s) and/or Working Groups for at least three communities' areas throughout the scoping, Alternatives Assessments, and EIR/EIS preparation period.

MTA/CTs must clearly and specifically indicate what efforts have been made to provide information and notices this information to the community of El Sereno.

The Scoping Report must provide:

Sources/models of projected traffic for freeways and arterials, presumably SCAG which will be used in all subsequent analyses, projections, forecasts, and assessments as part of the Alternatives Analyses and the EIR/EIS preparation;

Sources, access and availability, authors/operators, and funding sources/amounts

Assumptions: fuel prices, LA parking, Truck Bans, Toll Prices, O/Ds, capacities, LOSs

Assumptions regarding SR710 South Expansion and High Desert Corridors. (O/Ds)

4117 Barrett Road, LA 90032-1712,
323-528-9682, ctwiliams@yahoo.com

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: General Comments - Scoping Report

MTA/CTs must extend the "Scoping Period" as the NOP/NOI, public handouts, and visual/verbal presentations have differing "Needs and Purposes" (text, handouts, and CTs presentations) and "Initial Study Area" (text vs map) and therefore the proposed mitigations and alternatives cannot fully reflect the "initial Needs and Purposes", depending on which sets are used. MTA/CTs must recirculate the single operational "Needs and Purposes" and "Project Area" of the "project" in order to receive appropriate comments "inputs" regarding setting, impacts, mitigation, and alternatives ("potential solutions").

MTA/CTs must extend the "Scoping Period" and expand communities' participation as the scoping did not present the issues of Environmental Justice even though such significant community issues arose during the 1990s regarding the same project. MTA/CTs promotions and the Scoping program were biased as the "Study Area" and Scoping meetings. As no "initial study" was presented to establish absence, level, and significance –Low/Mid-Income resident impacted by thru-commuters–Direct/Secondary Impacts

Meeting were disproportionately focused on white, upper middle class outreach with little or no releases through Spanish, Armenian, and Chinese media.

Meetings were disproportionately focused on higher income areas with little or no releases or promotions through media which focus on low-middle income residents.

More affluent communities benefit while less prosperous communities are impacted, and some past alternatives which may be considered in the current process have used physical construction in lower income, less affluent communities in order to reduce impacts of congestion, etc. in richer more affluent communities (e.g., surface freeway through Los Angeles in order benefit Alhambra, San Marino, South Pasadena and western Pasadena).

The EIR/EIS must include under SocioEconomic elements the economic and social status of areas which are adversely impacted and those which benefit from congestion reduction and mobility/accessibility enhancements. The EIR/EIS must demonstrate balances of impacts/benefits for each of the benefited/impacted communities (e.g., each neighborhood council within the City of Los Angeles).

The Lead Agencies provided conflicting Project Needs/Purposes which has promoted Public Distrust of the project development, The Agency Scoping session and some Public Scoping sessions (Series 3) included in Purposes and Needs: "**Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including public private partnerships"**. During MTA considerations of moving forward with the Scoping, Dir. Katz also included a motion amendment to include financials in the EIR process and was approved by the Board. All EIRs/EISs include elements under SocioEconomic elements in which such can be considered and assessed.
The EIR/EIS and Alternatives assessments and analyses must include financial and economic aspects for each alternatives, including: local LACo jobs creation, labor vs equipment ratios, LACo equipment rentals and uses, small/medium contractor uses vs state/national/international financial ratios, etc.

MTA/CTs meetings only included El Sereno, Highland Park in City of Los Angeles, although a third of the Study area lies within the City of Los Angeles, third between LA and SR19, and a third east of

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Rosemead/SR19. More meetings were held in Alhambra, South Pasadena, and Pasadena in the central third compared to one in San Gabriel (eastern third) and original one then two in LA, western third. Two meetings were held totally outside of the Initial Study Area Map and physical descriptions in La Canada Flintridge and Glendale, while none were held in Monterey Park and East LA/City Terrace which lie within the mapped Study Area.
MTA/CTs must extend the "Scoping Period" as part of the Alternative Analyses for rigorous scoping and public participation in both Scoping and Alternatives development.

MTA/CTs must recirculate an updated NOP/NOI as the purposes and needs and the study areas presented in the originals changed significantly or are different from those being circulated to the public and to agencies.

MTA/CTs must extend Scoping and recirculate the NOP/NOI as the attempted education of the Public and Agencies about CEQA and NEPA did not provide realistic information on how to comment on the NOP/NOI for such a large Study Area of more than 100 sq mi with differing purposes and needs and differing "project descriptions".

MTA/CTs must recirculate an updated NOP/NOI as the project reported in the NOP.NOI differs from that presented in the Agency and Public Scoping sessions. The NOP/NOI presented measurements, 4.5 miles, and start and finish locations of Valley Blvd. (Alhambra and LA) and Del Mar (Pasadena). During presentations, no project description information was provided and the presenters indicated all possible alternatives, Surface/Subsurface, would be entertained from the Public or Agencies.

The Scoping report must include a full documentation of functionally related projects and of the project assumptions which form the basis of the purposes and needs for this "project" covering an area of 15+mi long and 6+ miles wide.

MTA/CTs must integrate with the nine-plus Los Angeles City's Neighborhood Councils within the Project Study Area and zone of influence and must incorporate them into the Alternatives Analyses process prior to the preparation of the EIR/EIS.

The EIR/EIS must include:

Categorical declarations:

SR710 project shall include trucks or shall ban trucks and
I-5 shall or shall not include truck restrictions/bans once the SR710 project may have been completed for trucks;

A comprehensive listing of all freight projects in the SCAG's area from Port Docks to Logistics centers or interstate rail shipments along with the anticipated flow capacities and volumes;

A thorough assessment of the needs and purposes of the SR710 North Extension project in relationship to the overall freight system throughout the SCAG area and specifically any changes proposed for I-710South, I-210 north of SR134, and SR14 from I-5 to SR138 and beyond;

A thorough assessment of the dependency of the SR710 project upon the I-710South project and the dependency of the High Desert Corridor Project on the SR710 project; and

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A comprehensive listing of project and land use development dependencies (including Altadena, LaCrescenta, and Palmdale-Victorville) and assessment of growth inducements and secondary impacts both on the up- and down-stream projects.

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Needs, Purposes, Goals, and Objectives

Some EIR/EISs simply state that ANY improvement, reduction, or increase fulfills the "needs" without regard to any quantitative levels and levels of impacts.
Prior to the initiation of Alternatives Analyses, the Scoping efforts and/or EIR/EIS process must provide a single set of all needs, purposes, goals, and objectives for the SR710 general categories of include quantitative "Needs" and "Purposes"

General Regional Network – Qualitative – Goals, Needs and Purposes
General Regional Network – Quantitative – Goals, Needs, and Purposes
Regional Network – Any transport facilities considered as affected, benefited or degraded, by the absence or future presence of the SR710 North Extension
Project Area Network – Qualitative – Goals, Needs and Purposes
Project Area Network – Quantitative – Goals, Needs, and Purposes
Project Regional Network – Any transport facilities considered as involved and/or affected, benefited or degraded, by the absence or future presence of the SR710 North Extension within the Study Area of I-5, SR2, SR134, I-210, I-605, and I-10

*Based on the written "**Preliminary Purposes and Needs**" of the Scoping Sessions, the Scoping Report must clarify and incorporate the following comments by specific needs and purposes: The NOP/NOI stated only two needs and/or purposes but during agency and public scoping other needs and purposes were added in visuals and verbal presentations but without inclusion of all items in hard-copy handouts to the public. Verbal requests for copies of the presentation materials were met with responses that the client had not approved such, although they had been provided to others and include the following:*

The Scoping process has not provided a basis for proposing potential impacts, related mitigation measures and reasoned alternatives - Lack of project description – no physical project in a 100 sq mi area - created confusion as to what comments involved. Alternatives assessments and analyses must be open to all proposed alternatives and every alternative must include a Truck Ban and Truck Allowed Option with appropriate physical rather than regulatory restrictions – e.g., clearances of 12ft vs 16ft.

All needs and purposes must be formally approved by both Caltrans and MTA and must be quantified and objective and must be available and accessible via webpages to the public and must allow for full public commenting. Following such, additional appropriate alternatives can be reasonably formulated and presented. All proposed alternatives must be judged numerically against quantified N/Ps.

All alternatives must be assessed in public and in writing, recommend webpage for each and must allow for full public commenting on the alternatives and the assessment process.

SR710 North has been reviewed before the current efforts and thereby current needs and purposes must be reviewed and compared to those of the 1990-2003 and those used for the 2006 feasibility study.

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The Scoping Report must provide the historic and current needs and purposes for the SR710 "Gap Closure" and/or North Extension, compare the different sets (if different), and provide rationale for any changes from the historic sets to those proposed for the current efforts..

1. Improve regional mobility and accessibility for the movement of people, goods, and services

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels which must include existing and future "growth" levels comparable with modeled levels

- *Improve – existing and alternative values, criteria levels of significance to Study*
  - *Regional mobility*
  - *Regional accessibility*
  - *Movement*
    - *People – individual cars, bus, rail, and others*
    - *Goods – Containerized, bulk, or break-cargos, 3, 4,5, and 6 axled goods trucks*
    - *Services – requires definitions or sources of terms*

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by numerical or percentage values.

2. Reduce circuitous out-of-direction travel on the network

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for –

Reduce – In feet, yards, - direct line, pavement lengths, travel times, etc.
"Circuitousity" – straight-line:route distances between origins and destinations
"Out-of-Direction" – shortest possible:fastest route distances for same origins-destinations
Network – any part of transportation facilities with more than 100 ADT involved in the Study Area

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for the "Network" used to establish the "routes" and distances – freeways, park-/expressways, highways, arterials, and local streets between origins and destinations

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by numerical or percentage values.

3. Reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels and specific listings for

Reduce – straight-line:route distances between origins and destinations
Congestion on Arterials – give specific classifications – Major Highways Class I or II, etc.
Congestion on Local Streets - Collectors or local streets – give specific classifications
North-South Arterials NE-NW to SW-SE respectively
Examples - San Fernando Road, Monterey Fair Oaks, Rosemead, etc. but not Huntington, Valley, Main-Las Tunas, Mission, Figueroa

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Clarify as to whether East-West arterials and local streets are excluded
Currently adversely affected – Within the context of the LA County provide basis for selection, references, and screening for adversely affected vs unaffected.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

4. Improve regional travel time savings and thereby reduce loss of productivity associated with congestion

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:
Improve – increase compared to what basis and time frames – current, 2035, or 2065
Seconds, minutes, etc.
regional travel time savings – District 7 summations, Study Area,
reduce loss of productivity – Driving, work, home and family, leisure time, etc.
associated with congestion – defined congestion and enumerate – LOS-F, F^1, F^2, F^3, F^4,etc.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

5. Provide additional connectivity in the regional network for use by public transit

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for
Provide – bus stops, transit station facilities, etc.
Additional Connectivity – lineal footage, ramps, etc.
Regional Network – Study Area by freeway/figure, by operational origins-destinations, etc.
Use by public transit - MetroLink, Metro heavy rail, Metro Light Rail, Metro buses, municipal buses of all cities within the Study Area.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

6. Improve regional and local mobile source site/air quality characteristics

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:
Improve - increases or reductions in establish air quality values
regional and local mobile source[s] – estimate individual and operating mobile categories
regional and local mobile site[s] – estimated for mobile sites – e.g., north of Glenarm to Foothill/Orange Grove in Pasadena, I-5 from I-10 to SR2, etc.
air quality characteristics – particulate matter – PM0.1, PM2.5, PM10, etc.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each Alternative within the Study Area and throughout the region. Criteria Levels

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must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

7. Reduce greenhouse gas emissions from mobile sources

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Reduce – as to area for categorizing – Airshed, LAMetro Basin, Project region of influence, Project study area, Project Right-of-Way, etc.

GHG Emissions – CO2, oxidized CO, and CH4 (compressed natural gas; CH4 has 20x more effect than CO2)

Mobile sources – including base-load coal-fired generation of electricity for transit, methane production and delivery into buses and other vehicles, etc.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each Alternative within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

8. Provide a project that constrains impacts in local communities to acceptable levels

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Provide a project -

Constrains impacts – Explain and quantify

Local communities – All neighborhoods with 2500ft of any alternative.

Acceptable levels – All project levels must be equal or better to existing levels.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each alternative within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

9. Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including public private partnerships

Also covered under separate comments specific to this subject.

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Develop -

Financially feasible project – Include capital, financial, and operations & maintenance costs

Consideration – Requires fully quantified costs and schedules of expenditures and revenues

Cost effectiveness – Include Cost/Benefit as the primary indicator of effectiveness

Viable funding strategy -

Public private partnerships – excluding Design and Build

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each alternative within the Study Area and any financial and funding relationships beyond the Study Area, such as facilitation of tolling on other highway elements . Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Financial Purposes and Needs
Resources, Impacts, Mitigation and Alternatives

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Written handouts of Project Purposes and Needs did not contain the same statements as presented in visual slides and repeated verbally as part of the Agency and public scoping sessions. Although direct responses to inquiries for copies of the public presentations, no copies would be provided; a copy is available through online sources at: http://www.bizfed.org/files/710NorthGap_ppt.pdf. Such online sources were not made known to or referenced for the Public. The exception (last one in listing has been discussed in a separate comment submittal and involves: **Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including public private partnerships**

The MTA Board approval of the environmental considerations for the SR-710 North Extension/Gap Closure included amendment statement to include the financial aspects. Throughout the scoping process, presentations of purposes and needs by Caltrans has included:

"Develop a financially feasible project, taking into consideration
cost effectiveness and
viable funding strategies,
including public private partnerships"

Furthermore, Caltrans recognizes the EIR category: Economic and Social Effects -

"Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. Although primarily directed at physical changes, CEQA regulations require that socioeconomic consequences of the physical change be analyzed."

"This means evaluating the impacts on an existing community, on religious practices, and on business activity brought on by the physical changes directly related to the project." (Volume 4 of the Caltrans referenced Environmental Handbook).

Therefore, CTs/MTA must provide in the Scoping Report, Alternatives Analyses, and EIR/EIS full financial analyses prepared for each alternative, including but not limited to:

Existing financial resources available and project alternatives' shares of such resources
Project alternative cost estimates
- *Life-of-Project*
- *Total Capital Costs*
- *Debt/Financing Costs*
- *Operations Costs*
- *Maintenance and Replacement Costs*

Funding strategies
- *Public Only*
- *Public-Private Partnerships as F&B, D&F&B, D&F&B&O, D&B&F&O&M*

Revenue Sources
- *Investor Assessment Only – Unsecured corporate bonds allowed*
  - *Public provides Rights-of-Way only,*
- *Public Assessment – Either separately or combined with investor assessments*
  - *LACounty Sales Taxes, Gas Taxes, Property Taxes/Fees,*
  - *Betterment District Fees, etc.,*
- *User and Beneficiary Origination Fees –*
  - *Container/Tonnage/Use Fees by Manifest- Ports of LB & LAm*
  - *Trucker Fees – fuel taxes, vehicle registration, direct user;*

Beneficiaries and Impacted SocioGroups
- *Delineate and defined existing socio-economic characteristics of those who benefit and those who may suffer impacts,*

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Delineate and defined socio-economic characteristics of those groups who benefit and may suffer impacts during the Project planning period 2015-2035,
Delineate and defined socio-economic characteristics of those groups who benefit and may suffer impacts during the life-of-project period (2015-2065+);

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Needs and Purposes and Screening
Written handouts of Project Purposes and Needs did not contain the same statements as presented in visual slides and repeated verbally as part of the Agency and public scoping sessions.

Once the needs and purposes for the Project are established and quantified as indicated as the purpose of the scoping, CTs/MTA must define and circulate sets of threshold criteria for alternatives screening comparisons of alternative achievements as compared to detriments. MTA/CTs must use these threshold criteria throughout the alternative development and screening process to ensure that the Project needs as expressed in the project needs and purposes are met for both the regional and local systems in a quantified manner.

2. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Project Description
The Project Description even within the CTs transmittal letter and attachments in the NOP/NOI for agencies contains inconsistent text descriptions as follows:

> Transmittal Letter "...710 Gap Closure Project...consists of **constructing an extension** of Interstate 710 from its existing northern terminus in the City of Alhambra to a new, yet to be determined terminus...a gap in the I-710 corridor...**distance of approximately 4.5 miles**...An **underground highway tunnel is under consideration**...may involve one of five possible route alignments."
> Attachment to above letter: "The proposed project...**may** include...surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems. local street upgrades, traffic management systems **[no mention of multimode low build considered in 1990s-2000s]** and a no build alternative...contributes to congestion on **local streets** and...**regional freeway system**. The objective...relieve congestion and improve mobility within the study area." (**emphasis added**; Mar.28, 2011)

The Scoping Report, Alternatives Analyses, and EIR/EIS must clearly provide objectives (which requires quantifications and scheduled elements) and perhaps longer term goals through the life of project, 2115 and coordination between goals and objectives and the Project's needs and purposes. These texts differ from the needs and purposes of the Public and Agency Scoping Sessions (Series 3). Here only two objectives while presentations had 8-9 needs and purposes.

As scoping is required to clearly define the Project's area and location the Initial Study Area contained in the NOP/NOI does not and the Project area contains 100 sqmi, approximately 6+mi NS x 15+mi EW while the text Description - West: SR2, North: SR134/I-210, East: I-605, South: I-10 does not conform with the Image Description -

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The Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must all clearly define the physical locations and the functional network elements of the Project. The current NOP/NOI and presented materials do not clearly identify the Project, description, and physical/functional locations. References to the five zones are not explained and related to the Project location(s).

The Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must include the potential Functional Systems in which the Project will function and the conditions of the same system without the Project. The Functional Systems must include any transport-related projects or systems which may influenced or affected by the proposed Project – at the levels of Metropolitan Network, Regional System, Study Area, and Corridor/Local Areas.

The Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must include the desired Operational Levels and Regulatory/Industry Standards and Requirements, such as: expected volumes/vehicles per hour per lane or maximum percent longitudinal grades for light vs heavy duty trucks and other vehicles (2%, 5%, etc. for up to 5000ft). Without such requirements, proposal of alternatives and mitigation measures cannot be adequately provided and may be unreasonable.

Materials provided do not clearly identify the Project's basic assumptions for current and future conditions related to the Project; the Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must include the basic physical, functional, economic, and financial conditions assumed for the development of the Project, Alternatives, and mitigations.

The Scoping Report, any Alternatives Analyses, and EIR/EIS must provide estimates or assumptions, such as:

- *Gasoline/Diesel Fuels of $4.50/gal by direct costs and Fuel Taxes*
- *LA City Day-Parking Fees*
- *Ports of Los Angeles and Long Beach projections of containers imports/exports*
- *So.Cal.Internatl.Gateway and Integrated Container Transfer Facility projections of containers movements*

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2. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Project Description – Caltrans Lands and Properties

As part of the Scoping Report, Alternatives Analyses, and EIR/EIS, Caltrans (CTs) must provide a map and listing of all existing CTs, State, and MTA properties which are currently unused for any public purposes, are vacant, or have been leased for non-transportation uses within the Study Area as defined in the figure above. The listing should indicate original purchase date, purchase costs, and current status, whether occupied or vacant, perhaps as of January 1, 2011.

3. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Important Known/Suspected Resources and Expected Significant Impacts

During the Series 1 sessions, many community members listed the resources considered to be important or significant within their communities, their current transportation concerns, and considerations (solutions) as to how to solve such concerns. Some of these sessions occurred before and after the date of circulation for the NOP/NOI but presenters stated that this is not part of the Scoping comments.

MTA/CTs must require incorporation of ALL public statements from participants during the Series 1 SR-710 Conversations sessions into the Scoping Report and incorporate them into the Alternatives Analyses and EIR/EIS for important environmental resources, current adverse conditions, and mitigation measures or alternatives for the Study Area, for example:

MOST IMPORTANT RESOURCES

Mission Station/Farmers Market, Station/Farmers Market Trader Joe's Home Town
Mission-GoldLine Transit Station Village
Huntington/Fremont Transit MultiFamily Neighborhood Villages (MTA258/79)
SoPas and Glendale Cities of Trees and Top-Recognized K-12 School Districts
Meridian-Garfield Historic Districts -1920-30s Old Transit Villages/Centers
Historic Districts -1920-30s Old Transit Villages/Centers
Short Line/Berkshire Historic District; Numerous Bungalow-1920-30s Transit Villages
Golf Courses, Brand, Wilderness, and other Parks, Forest Lawn, Equestrian
Great Views of SanGabriel, Verdugo, San Rafael, and Hollywood Valleys/Hills/Mountains
Green Hills - Ascot Hills, Elephant Hill, Barrett Hill, Montecito Heights, Monterey Hills
Arroyo Seco River and Valley
Small Town/Village/Hills Enclaves
Strength in Fusion – Hillside Ordinance/Manorization
Small Town/Village/Barrio Cohesion and Hill/Valley Enclaves
"Pride of Place" *1990s Env.Justice Suit Against 710 Tunnels*
Alhambra's 710 Degradation of El Sereno/Sierra Park
SoPas Isolation by Street Barriers along City Boundary
El Sereno Recreational Center/Middle School
El Sereno Downtown Planning by Community Members
Community Variety – Buddhist Temples, Korean Church and Protestant/Catholic Churches
Rose Bowl/Parade, OldTown, City Hall,
Huntington Hospital and Medical District
CSU Los Angeles, USC/LACo Medical Startup Facilities
Active BioMedical Adelante Industrial Development, CRA and Enterprise Zones
PCC-College, Ambassador and CalTech Institue
NortonSimons/Huntington Museums
South Pasadena and Pasadena City Libraries

GoldLine Transit Villages
MetroLink Transit/Amtrak Station
GridIron Roadway and Green/Walnut OneWay Couplet

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MTA Bus 256-Community Supported for 4 years
Central Access to LA, Pasadena, SanFernando Valley, Mountains, and Coast
SanFernando Road and Colorado Blvd. Arterial Ways
Transit Villages - Maycrest, Poplar, VanHorne. Eastern, Collis, Monterey Rd., Soto/Mission
Buses 78/79/256 and DASH
First Single Grade-Separated RR Crossing

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Geology, Mineral Resources, Soils and Topography

A major Study of the geology of the Study Area was conducted and resulted in a statement that all routes were technically feasible for various types of bored/mined tunneling methods. The Study also found subsurface evidence of extensions of known "active faults" but although stating that they would do surface surveys, none were undertaken and reported or documented. The geology of the eastern half Study Area is complicated in areas and at depths through which tunnels may be constructed and surface-exposed geological formation clearly show "faults", fractures, and zones of overturning of beds with significant displacement.

Although these are not formally designated as "active", the EIR/EIS must conduct a thorough underground study of any tunnel alignment with borings at no greater than 1000ft intervals and at depths of no less than 300ft below surface (e.g, based on 3x tunnel diameter of cover over a tunnel diameter of 60ft plus a margin beneath the tunnel invert/floor.
All faults, fractures with displacement of more than 1ft, and overturned folding must be further documented and incorporated into designs and mitigation for ground stability issues.

Although the geological study discussed methane gas occurrences in the borings, the information provided is inconsistent and undocumented with appropriate protocols for ground gases. Several oil/gas wells occur within the delineated study area and some are not abandoned. Gas was attributed to one formation but without appropriated documentation and apparent specialist knowledge of ground gases, composition, and characteristics.
The Scoping Report, Alternatives Analyses and EIR/EIS must be based on appropriate well-documented studies of existing well records (e.g., State DOGGR) and ground gases during every boring for any purposes. A well-qualified "gas expert" must be used and a well monitored three-point monitoring system must be used, similar to those used by MTA/RTD for the Wilshire segments of the earlier Red Line Phase 2 along Wilshire and Fairfax streets.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Structural Geology, Seismicity, Liquefaction, Subsidence, and Landslides

The earlier referenced geological study did not include appropriate geological investigations of ground stability. Geological materials may have been analyzed but the structural geology was not documented for the five zones or the current Study Area. General statements of seismicity and "active faults" did not focus on the documentation required for the EIR/EIS and especially for Alternatives Analyses.

The Alternatives Analyses and EIR/EIS must include a full geological documentation of all significant construction and all tunnels zones and corridors, including:

All faults, fractures, and complex folding – surface and subsurface evidence
Microseismic monitoring for events of <R4 (e.g., 100 seismometers)
Groundwater levels – initial and seasonal (requiring piezometers in borings)
Ground levels monitoring (all past records, quarterly and later annual measurements)

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The documentation must be based on 1000ft intervals within 3000ft of any significant construction and all tunnels.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Water Resources and Quality – Surface Waters

The Alternatives Analyses and EIR/EIS must include a thorough stormwater and waterway inventory throughout the Study Area and must be used within the Alternatives Analyses to evaluate the current storm water concerns of the Regional Water Quality Control Boards for reducing runoff and reducing pollutants to surface riverine and coastal regimes.

The Alternatives Analyses and EIR/EIS must include annual and maximum stormwater, groundwater, and wastewater generation for each alternative and the Project and any treatment required for discharge or onsite reuse.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Water Resources and Quality – Subsurface Waters

The EIR/EIS must include a thorough groundwater inventory throughout the Study Area and such information must be used within the Alternatives Analyses to evaluate the current groundwater uses and disposition concerns of the LA and San Gabriel Rivers Basins adjudication and Water Masters. The Alternatives Analyses and EIR/EIS must include an integration of the geological and groundwater studies in order to properly consider the impacts of deep construction and surface development upon the infiltration/recharge, movement, and potential uses of groundwater.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Air Pollution from Project Implementation

The Alternatives Analyses and EIR/EIS must include a thorough inventory, analyses, modeling, and assessment of air pollutant generation, air quality, and potential measures to maintain and improve current air quality. The basic approach must include the basic criterion of "do-no-harm"; existing air quality shall not be degraded and shall be improved over the planning period up to 2035 and throughout the Project's capital improvements expected operating life, 50-100 years.

The Alternatives Analyses and EIR/EIS must include air quality considerations separately for: 1) ONLY the Study area, 2) a regional consideration for those areas where a "significant" change (e.g., 5% up or down) can be documented to result directly from the Project, and 3) the Project-related air shed based on AQMD delineations (e.g., east of I-405, east of US-101, north of I-105, etc.).

At this time, changes in traffic are expected in the I-5 and northern I-210 corridor airsheds based on regulatory changes of truck traffic. The Alternatives Analyses and EIR/EIS must include separate assessment of traffic generated air pollutants based on Alternatives including any regulatory constraints and requirements on modes of traffic (e.g., Truck Bans on LA downtown I-5) rather than physical attributes of the Project (e.g, height clearance, lane widths, grades, etc.)

The Alternatives Analyses and EIR/EIS must include considerations of air pollutants generated during both construction and operations of any "build" alternative. Air pollutant generation would generally correspond to the construction value and duration while operations generation would

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generally correspond to the number and types of vehicles, not directly related to the distances and number of passengers and/or volume of materials moved.

Existing Setting - Conditions and Resources

As generally accepted, the Los Angeles Metropolitan area and the project area has been historically and for the foreseeable future (>2030) the worst air quality in the United States, and some have recommended a special category for California's South Coast Air Basin. Similarly the South Coast Air Basin (LAB) has the worst road congestion in the US and especially when adjusted for population resulting from the long distant commutes by mostly single occupancy vehicles even with the most stringent emission controls for mobile sources in the US.

The project area of about 100sq mi is largely residential or mixed residential and light commercial land uses. The project is delineated by major congested freeways and interchanges which contribute to the degraded air quality within the study area and the Air Basin, as a whole. Most cities and communities of the project area have numerous mixed multi-family and commercial arterial corridors, except for Pasadena which has a more traditionally defined central business district. Previous studies have shown more polluted air quality along I-210 east of the I-710 interchange and around the I-605/I-10 interchange compared to the eastern half of the Study Area and to the somewhat more degraded air quality in the western third of the Study Area; all levels in the Study Area are noticeably less air polluted than the I-710 corridor south of SR60.

The Alternatives Analyses and EIR/EIS must include detailed 1000-2000ft interval model cells with appropriate inventory information to support such modeling results to establish both short and longer term air quality intervals for current conditions. These results on say a 1500ft grid must then become the criteria levels for comparisons of impacts; any exceeding of the existing air quality would be considered as significant. Similarly, based on the AQMD plans and projections of air quality, modeling of future air quality through 2035 must maintain or improve (reduce pollutants) air quality without the Project, and the Alternatives Analyses and EIR/EIS must include modeling results to show that the Project would generate air quality levels equal or below the expected local air quality based on the AQMD plans through 2035.

Few industrial zones exist within the project area and are generally concentrated along the historic railroad corridors: near San Fernando Road, Monterey Road, Mission Road, and Valley Blvd. Most industrial areas are considered as light to medium industries and integrated through community redevelopment authorities; no heavy industrial land uses exist within the project area.

The Alternatives Analyses and EIR/EIS must include the many structured, combined, and unstructured "Sensitive Receptors" contained Study Area such as:

> *CalTech, CSULA, PCC, Occidental College, LACC/Fletcher Campus, Ambassador College, Adelante/USC-Biotech, Huntington Hospital, Alhambra Hospital, LACounty/USC Medical Center, Southwest Museum, Norton Simon Museum, Huntington Library, Old Town Pasadena, Schools (K-12), Churches/Temples/Mosques, Clinics, Parks, and Golf Courses (SoP, Alh), and Rose Bowl Parades (Pas).*

As throughout the South Coast Air Basin, the predominant sources of air pollutants are transportation facilities, such as:

> Congested SR2, SR19, SR110, SR134, I-5, I-10, I-210, I-605, and I-710 ROWs/Interchanges, Union Pacific and BNSF Railroads' ROWs and Yards (SCIG, ICTF, Hobart, etc.), Taylor Yard/MetroLink (SanFernando Rd.), Mission Road Yard, Hobart, and Valley/AlhambraAve. Sidings.

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Few fixed or area industrial air pollutant sources exist:

Pasadena Power Plant-FairOaks/Glenarm (Pas),
Humboldt/Ave33 (LA), Valley/Medford/Fowler (LA), Mission Ave./Soto/Valley (LA),
Sycamore/Pasadena (SoP),
Westminister/Raymond/Mission Road (Alh),
Baldwin/Lower Azuza (Ros/ElM), East of Peck Rd. (ElM).

The Alternatives Analyses and EIR/EIS must contain:

Full inventory of all known/permitted and anticipated (=future) fixed air pollutant sources,
Full inventory of all known area and line air pollutant sources and estimated air pollutant generations from all area (>10ac) and line sources of air pollutants,
Full inventory of all known and expected sensitive receptors and corridors in the Study Area and additional detailed inventories for individual receptors within 5000ft of any major (>$200M capital works costs) project facilities .
Monitored and recorded air quality within the project area – monthly/seasonal ranges and resolution of at least four monitoring sites per square mile (less than 3000ft separation),
Calibrated and modeled air quality within the project sectors and area – monthly/seasonal ranges and resolution of at less than 1000ft separation,
Urban Air Shed Model for project area and 5mile zone of influence, especially upwind – westerly – downtown – including worst-case (maximum), median, and quartile wind circulation/mixing conditions for study area

The Alternatives Analyses and EIR/EIS must include full weather (T/RH/WDir/WSpd) and air pollutant monitoring of all expected pollutants and precursors (e.g., CO, NOX, VOC, PM10/2.5/0.1,etc.) on a one-mile grid for at least one year and at least 1/month ballon-survey of stratification of weather and pollutants up to 1000ft above highest point in study area; conduct monthly airborne LIDAR surveys for particulates and NOX.

Potential Significant Impacts

The Alternatives Analyses and EIR/EIS must provide and compare existing, no-build future, base-case build alternative, and other alternatives for differences and changes of air pollutant emissions and resulting regional and local air quality within the project study area.

The Alternatives Analyses and EIR/EIS must include:

Projected future air pollutant generations from all area and line sources of air pollutants for No-Build-, Build-Base-Case-, and Other-alternatives ,
Seasonal and Annual air quality within the project area – monthly/seasonal ranges and resolution of four modeled sites per square mile throughout construction periods and for Year Two and 2035 year operations
Modeled air quality for each alternative within the project area – monthly/seasonal ranges and resolution of at less than 1000ft separation within 5000ft of the alternatives' operation influence

The Alternatives Analyses and EIR/EIS must identify those:

Significantly Impacted Communities - 10 highest levels of changes above existing levels for any areas of 100 acres (1000+ft radius from model points)
Affected Communities - - Upper quartile levels of changes above existing and future no build levels for any areas of 100 acres (1000+ft radius from model points)
Less Affected Communities - all areas with less than 25% increase from existing modeled levels

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Less benefited communities - all areas within less than 25% decrease from existing modeled levels
Beneficiary Communities - 10 areas with most reduced air pollutant levels below existing levels for any areas of 100 acres (1000+ft radius from model points)

The Alternatives Analyses and EIR/EIS must include and identify those areas with any increased air pollutant levels (reduced air quality) which include single "sensitive receptor" as listed above. The EIR must identify also identify those areas within the upper 10 highest increased air pollutant and contain any "sensitive receptors" within 5000ft radius. The EIR must include a "Health Risk Assessment" for any area with one "sensitive receptor" and must include a "Health Impact Assessment" for 1) any of the ten highest increase areas with at least one "sensitive receptor", 2) and for any increase-areas with more than one "sensitive receptor", and 3) areas with two highest levels and two highest increases in pollutant levels.

If an alternative has fixed sources of emissions, all sources must be assumed to be worthy of "hot spot" modeling of the emissions and air quality degradation. If modeling indicates any increases in air pollutants, the alternative must include mitigation to collect and treat air pollutants before emissions. Fixed sources in any alternative shall not be designed to reduce ground levels to existing emissions levels by elevating, heating, or increased fan velocity in order to dilute the pollutant levels; the solution to air pollution shall not be by dilution and shall be achieved by treatment/removal of pollutants.

Potential Significant Benefits

As indicated above, the Alternatives Analyses and EIR/EIS must include and identify "Beneficiary Communities (areas or zones)" within the project area and within 10,000 ft of the project area and quantify levels/estimates of improvements. If improvements occur or are expected to occur at greater than 10,000ft from the project area boundary, further studies and identification must be required.

Prospective Mitigation Measures/Activities

The EIR/EIS and Alternatives Analyses and assessments must protect Air Quality within the Air Basin. Any Alternative which increases air emissions and degrades air quality within the project area and modeling areas must include mitigations to return the area air quality to the existing ambient levels and their continued declines throughout the mid-term period up to 2035 and to meet the SCAQMD's planned achievements for 2035.

If "Hot Spots" analyses and modeling of any alternative indicate increases affecting "Sensitive Receptors", The Alternatives Analyses and EIR/EIS must include mitigation to return the air quality modeled levels to pre-existing levels equal to the 2012 ambient, and the mitigated alternatives must include receptor protection measures (e.g., air conditioning, filtration of intake air, interior air filtration, etc.) to mitigate any risk of failure by the source mitigation.

If alternatives have fixed emissions sources (e.g., any device using fans, vent stacks or "natural venting" through portal openings), all fixed emissions must be treated before release and shall not be "treated" by dilution to reduce the pollutant emissions levels.

The Alternatives Analyses and EIR/EIS must include the following mitigation measures, as part of mitigation for contained facilities, electrostatic precipitators and associated particulate filtration down

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to PM0.1 with removal/treatment efficiency sufficient to reduce any tunnel alternatives' emissions to equivalent to surrounding existing air quality without project.

The EIR/EIS must include the following be completed: an HRA and a socioeconomic impact study.
The EIR/EIS must include the following be identified and studied: air pollution impacts; global warming impacts; noise standards and noise impacts; growth impacts; construction-related impacts; aesthetic impacts; traffic impacts; maintenance and operation impacts; and impacts to the storm water runoff and discharge.
The EIR/EIS must include the document will include Air Quality and HRA and The EIR/EIS must include and assess concerns with the future highway projects not increasing traffic, air quality, and health impacts.
The EIR/EIS must include the following: a detailed analysis of the effects of diesel particulates on those living and working near the project; evaluation and examination of all potential health effects caused by the project; discussion of traffic-inducing and congestion-producing impacts; discussion of irreversible impacts to habitat, navigable waterways, recreation resources, and water quality; and growth of goods movements infrastructure at the ports and in the Inland Empire.
The EIR/EIS must include information about what trees will be considered to make the freeway more attractive and voiced support for designated truck lanes and limited access.
The EIR/EIS must include and assess information about a fuel-saver transit system in response to a need for public mass transit, pollution from diesel trucks, and traffic congestion.
The EIR/EIS must include previous documents and studies be considered. The EIR/EIS must include and assess with air quality, cost benefit analysis, global warming, and noise.
The EIR/EIS must include and assess with noise and decrease in housing and quality of life.
The EIR/EIS must include and assess with public notification in the Study Area; traffic congestion from trucks, health impacts, and zero emissions.
The EIR/EIS must include the EIR analyze a zero-emissions alternative.
The EIR/EIS must include and assess with health impacts and community participation framework.
The EIR/EIS must include and assess with health impacts in proximity to freeway, a threefold increase in trucks, and the availability and legal documentation of the NOP posting for the proposed project.
The EIR/EIS must include a tree planting project be incorporated into the project to reduce pollution and noise.
The EIR/EIS must include cul-de-sacs created by the project be used as opportunities for the community gardens, tree planting, and daycare centers.
The EIR/EIS must include and assess with air pollution and health impacts.
The EIR/EIS must include and assess with more pollution and SR710/I-10, /SR110, and /I-210 connection.
The EIR/EIS must include and assess with air quality impacts and reduction of diesel particulates.
The EIR/EIS must include and assess with pollution, noise and impacts to parks.
The EIR/EIS must include and assess with air quality and improvements for Study Area railyards (Mission, Taylor, and Aurant/Alhambra Rd.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Air Resources - Noise

The Scoping Report and EIR/EIS must include a thorough and comprehensive monitoring of existing noise levels at more than 20 different locations for each alternative at daily, hourly, and instantaneous/peak (10 sec.) intervals within the project area and similar monitoring wherever

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modeled traffic would increase over those at present. The Scoping Report and EIR/EIS must include inventory of all noise sensitive land uses including but not limited to the following:

Medical, Senior Care, and Children Care facilities and complexes
Religious and cultural facilities
Educational, scientific, and research facilities,
Recreational facilities and Parks
Major population concentrations – transit stations, commercial centers

The inventories must include daily, hourly, and peak/maxima levels within the sensitive facilities

The Scoping Report and EIR/EIS must include modeling of noise generation and projections within 1000ft of any project elements in each alternative for both construction and operations. If modeling showed any increases within the initial zones, the zones should be expanded to the limits of any increases within and beyond the initial zones.

If noise levels are found to exceed those during the monitoring period, the Scoping Report and EIR/EIS must include, as part of mitigation for contained and open road facilities, noise absorption and reflective measures with treatment efficiency sufficient to reduce any alternatives' generation to equivalent to surrounding existing noise quality without project.

The Scoping Report and EIR/EIS must include adequate mitigation for any increases over the ambient noise levels by either controlling sources, interfering with noise transmission, or protecting sensitive receptors.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Air Resources - Vibrations

The Scoping Report and EIR/EIS must include a thorough and comprehensive monitoring of existing vibration levels at more than 20 different locations for each alternative at daily, hourly, and instantaneous/peak (10 sec.) intervals within the project area and similar monitoring wherever modeled traffic, transit, or other vibration sources would increase over those at present. The Scoping Report and EIR/EIS must include inventory of all vibration sensitive land uses including but not limited to the following:

Medical, Senior Care, and Children Care facilities and complexes
Educational, scientific, and research facilities
Major population concentrations – transit stations, commercial centers

The inventories must include daily, hourly, and peak/maxima levels within the sensitive facilities

The Scoping Report and EIR/EIS must include modeling of vibration generation and projections within 1000ft of any project elements in each alternative for both construction and operations. If modeling showed any increases within the initial zones, the zones should be expanded to the limits of any increases within and beyond the initial zones.

If vibration levels are found to exceed those during the monitoring period, the Scoping Report and EIR/EIS must include, as part of mitigation for contained and open road facilities, vibration absorption and isolation measures with treatment efficiency sufficient to reduce any alternatives' generation to equivalent to surrounding existing vibration regimes without project.

The Scoping Report and EIR/EIS must include adequate mitigation for any increases over the ambient vibration levels/regimes by either controlling or isolating sources, interfering with vibration transmission, or protecting/isolating sensitive receptors, facilities, and equipment.

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4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Cultural, Archeological, and Historic Resources

Approximately 10 years has passed since Caltrans completed an updated survey of historic resources in Pasadena. Obviously, a large number of additional structures will have reached the 50-year mark and will need to be researched.

Because of the potential adverse impacts on possible National Register eligible properties, the Scoping Report and EIR/EIS must include a careful and thorough historic survey within 1000ft of any proposed facilities or alternatives of the Project under consideration. The survey of historic properties must be done by an experienced historic preservation consultant – and in cooperation with State Office of Historic Preservation, Pasadena Heritage, South Pasadena Preservation Foundation and Los Angeles Conservancy.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Hazards - Accidental, Natural, and Targeted Events

The Scoping Report and EIR/EIS must include a full and thorough inventory, analyses, and assessment of hazards from accidents, natural events, and targeted events ("events") that could be expected during both construction and operations of any "build" alternative. In general, events would generally correspond to the construction activities and duration, while operational events would generally correspond to the number and types of vehicles, not directly related to the distances and number of passengers or volume of materials moved. Accidents would be more numerous as the modes become mixed: motorcycles, sedans, SUVs, vans, mini-buses, full-buses, light and heavy pickups, long-distance buses, and 3,4,5,6-axled trucks, while flow/capacity generally related in a direct positive manner to accidents. Other targeted events relate to very different factors but would generally relate positively with vehicular volume/flow and perhaps to larger vehicles with larger on-board fuel tanks.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include review of natural events, earthquakes, rain storms, droughts, wind storms, etc., for the Study Area which could be expected within the project operational life span, 50-100 years for major capital projects. The Scoping Report and EIR/EIS also must include review of human/urban events, traffic accidents, pedestrian suicide attempts, etc., for the Study Area which could be expected within the project operational life span, 50-100 years. As the latter occur on a daily basis,

As generally accepted, the Los Angeles Metropolitan area and the Study Area has historically had a few significant accidents within road tunnels as most "tunnels" are short and through-passage is rapid (seconds to minutes). As these accidents have occurred they could be considered as a minimum level of involvement and not a worst case event.

The Scoping Report and EIR/EIS must include review of accidental events, including a worst case of two light vehicles and two heavy duty vehicles with a total fuel spill of 150 gallons, and worst case natural events (e.g., >6R earthquake on the Raymond Hill or Alhambra Active Faults at depths of less than two miles with periods of 2 minutes) for any alternatives.

So far, no reported significant "targeted event" has occurred in California although many suitable targets exist.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include a base case intentional "targeted event" which can be based on the following:

Two light duty vehicles – moving through the project facilities each way (total: four vehicles)

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Each vehicle carries two drums of fuel in rear compartments with attached road flares
Vehicles release their ignited road-flare on fuel drums onto pavement with maximum longitudinal grades and speed away, occupants vacate thru nearest emergency exits or sacrifice.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Landuse Compliance and Suitability

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all existing landuses and relationship of existing landuses and existing landuse plans for the Study Area. The inventory must also include all known transportation origin and destination studies related to the Study Area, including any origins, any destinations, and any pathways passing through any part of the Study Area. The inventory must further include all project landuse and demographic related growth during the current planning period up to 2035 and expected for the life of project, up to 2065.

Landuse growth beyond 2035 must consider the assumed costs and availability of fuels for goods and passenger transport by light and heavy duty vehicles compared to road and rail transits.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: SocioEconomics – Costs/Employment

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all existing and future CTs, MTA, and State properties within the Study Area and within 1000ft of any proposed facilities. As part of the inventory, all existing occupants, residents, and site workers must be interviewed and any cultural concerns, comments, and issues must be collected and incorporated into cultural assessment of existing conditions and how any particular project alternative may influence the cultural aspects of those involved in past and current property and community resources of public properties.

An inventory of all vacant and/or leased-rented properties must also include their current/2011 valuations and current revenues and expenditures.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventories of jobs and employment for heavy construction and for transit and vehicle operators and maintainers within the Study Area, Region, and County. Projected employment for Project related jobs must be quantified and located as to the Study Area, Region, and County.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include a full economic analyses of Study Area and Regional conditions and economic and employment resources and opportunities and given current conditions an assumed economic constraints of local, county, regional, and state resources for both the planning period to 2035 and the life of project period to 2065.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all tolled transportation facilities within LA County, SoCal/SCAG area, California, and the western US and their charges, lengths, capacity and Levels of Services.

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4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: SocioEconomics – Environmental Justice

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all existing and future CTs, MTA, and State properties within the Study Area and within 1000ft of any proposed facilities and the ethnicity and income characteristics. As part of the inventory, all existing occupants, residents, and site workers must be interviewed and any cultural concerns, comments, and issues must be collected and incorporated into cultural assessment of existing conditions and how any particular project alternative may influence the cultural aspects of those involved in past and current property and community resources of public properties. The Scoping Report, Alternatives Analyses, and EIR/EIS must include an assessment of environmental justice issues within and amongst the State owned properties' tenants, renters, leasees, and occupants based on direct interviews and audited records and assessed conditions, valuations, and terms/conditions.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include comparisons of environmental property conditions amongst the various communities within the Study Area and assess whether preferential treatments have been administered for those involved.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory and assess the identified "Beneficiary Communities (areas or zones)" within the Study Area and LA County and quantify levels/estimates of transportation improvements. If improvements occur or are expected to occur beyond the Study Area, further studies and identification shall be required to inventory and assess prospective improvements. If improvements are generally restricted to the Study Area or if portions of the Study Area (eastern vs western) show statistically significant differences, further studies of improvements vs ethnicity/incomes/employment must be undertaken.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Secondary, Indirect Impacts Growth Inducements

Either as a Freeway or Tunnel systems, any infrastructure transportation road improvements are to serve areas well beyond the limits of the improvements, and to integrate with other projects which are planned, underway, or completed as an overall program or system. Therefore by the very nature of roadway (infrastructure) projects, secondary and/or indirect impacts (both beneficial and detrimental) are generated for area outside of the direct project area.

The SR710 is such a project and will generated secondary and indirect impacts outside of the limits of the physical project. Some such impacts are further identified as "growth inducements" where the intentional or unintentional consequences of the project spur the development of currently undeveloped lands within the project's "service areas" (e.g., Altadena, La Crescenta, LaCanada-Flintridge, NE San Fernando Valley, Mint Canyon, Canyon Country, Palmdale, etc.).

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all areas which will derive any discernible improvement of transportation conditions due to each Alternative both within and beyond the Study Area. Specifically special studies must focus on:

Ports of LA and Long Beach,
near dock areas south of I-5,
I-710 corridor (including 15,000ft either side) from the ports to I-10,
I-210 corridor (east and north, I-605 to I-5),
I-5 (I-605 – SR14) and SR14
High Desert Corridor and SR138

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As the project's life extends throughout the current forecast period of the So.Cal.Assoc.Govts. and actually well beyond 50-100 years, major secondary growth inducement impacts can be expected as typical of any such roads project. As this particular project has been deemed so vital to the entire regional transportation region (e.g., entire San Gabriel Valley, 210 Corridor/Eastern San Fernando Valley, and Palmdale), the impacts of its implementation may have even more spectacular effects in the region and well beyond the 100 sq mi "Initial Study Area".
The Scoping Report, Alternatives Analyses, and EIR/EIS must include a thorough inventory, assessment, and beneficiary projections for all area related to any transportation systems passing through the Study Area. MTA/CTs may consider these areas for prospective beneficiary assessment for the costs of construction and operations and maintenance. Such areas must also be assessed for potential Environmental Justice issues.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure – General Transportation

The Scoping Report, Alternatives Analyses, and EIR/EIS must provide all transportation assumptions for the planning (2035) and life of project period (2065) for each Alternative:

Fuel Prices
Parking Prices
Parking/Unit Requirements
Labor costs
Origins/Destinations
Passenger and Goods projections

During the SR710 Conversations - Series 1 Sessions, the Public provide many transportation concerns and issues.
The Scoping Report, Alternatives Analyses, and EIR/EIS must include individually reviewed, compiled, and assessed of the concerns as part of the general review of transportation and their relationships to each Alternative, include the following:

Freeway Butchery – Northern and Southern South Pasadena
Truck/HOV/Bus Ban on SR110
N/W Bound Trucks on I-210 Avoiding I-5 – AND >2% ROAD GRADE – NO CLIMBING LANES
NOISE/DIESEL ON BOTH SIDES
SR134/210 CONGESTION AND RAMP TAILBACKS – HOV/LOS F 330-630pm
SR110>OrangeGrove Freeway SR/Fremont/Columbia>Pasadena>710Stub SR110>Arroyo/Marengo
SAN GABR. VALLEY/MONTEREY HILLS COMMUTERS IN SINGLE OCCUPANT CARS
Lack of SCAG/MTA Coordinated Planning in Open/Transparent Manner – I-5/ExpressLanes
Lack of SCAG/MTA Coordinated Transportation Plan for Regional Rail/Road Commuter Routes
Lack of SCAG/MTA Coordinated Plan of Rail Transportation in Open/Transparent Manner
Lack of SCAG/MTA Coordinated Plan of Rail Transportation for Container Freight
Lack of SCAG/MTA Fuel Taxes and Plans for Transportation/Landuse Planning
Losses of DASH/MTA Feeder and Workers' buses - <25% San Gabriel Bus Commuters
Lack of SCAG/MTA Fuel Taxes and Parking Fees for Transportation/Landuse Planning
Inadequate Last Mile Transport feeders (DASH, etc.) and Pedestrian/Transit Villages/Centers.
W-E Commuters based on single occupancy vehicles – 95% on Huntington, Valley, and Figueroa
LA DoT pays for 85% of commuters from east of the 710 Corridor – Let the Beneficiaries Pay – Need congestion pricing zone for non-transit passengers = ExpressDistricts
Cheap downtown parking rewards single occupancy commuters, low income forced to transit
Past fuel prices supported single occupancy WSGValley vehicles and higher transport O&M for LACity; future much higher fuel prices must be reflected in transport
Lack of Connector Road to Mission Road, not Alhambra Ave., Shared Sacrifices.
Lack of Alhambra congestion reduction measures, purposefully making worst, to get ???

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Lack of Fed, State, LACo funds = PPP + Traffic Assessment/Parking Districts + Congestion $20-Tolls.
Freeway Butchery – Via SR110 – Northern/Southern and SR710 Eastern/Western South Pasadena –SR2, SR134, I-5, and I-210 –FarWest, SouthCentral, NorthCentral, East, & North – I-10 City Terrace/Ramona Gardens - Marengo-CityTerr.-Ram.-Garvey
SR110 Truck/HOV/Bus Ban forces traffic to Figueroa and Huntington
Truck/HOV/Bus Ban on SR110 and Diversions to Figueroa, Monterey Road, and Fremont/FairOaks
SR110/Fremont/FairOaks/Garfield Congestion/Ramp-Tailbacks(OrangeGrove and FairOaks)
NO Arterial Management for Fremont, FairOaks, Garfield, Huntington, and Monterey Road
Orange Grove Freeway – Signals Synchronization for Pasadena/Fremont Thru Commuters (5-7%,
Huntington Freeway – Signals Synchronization for the Good of San Marino Commuters (5-7%, 2+)
Huntington and Monterey Rd Thru-Traffic Congestion Sacrifices Local TrafficMTA GoldLine – Disregard of At-Grade Crossings and Lack of Parking Poor ADA Compiance
Poor MTA Thru-Bus Routings Lack of Adequate Feeders/Shuttles – First/Last Miles Connections
Protecting N-S Route of Bus 258…Ridership/Productivity/Service
Poor MTA Thru-Bus Routings Lack of Adequate Feeders/Shuttles – First/Last Miles Connections
Lack of Local Feeders/Shuttles for NE/SW MultiFamily Villages - First/Last Mile Problems
Historic SoPas Isolation/Segregation from LA, El Sereno and Garvanza
Historic Separation/Isolation of Multi/Single Family Developments
LACK of CaHSRA Coordinated Plan of Routing/Stations in Open/Transparent Manner
Commuter GAPS - <10% Multi-Occupancies – Few Car/VanPools
Caltrans' GAP – SR2 and SR-134 why not Interstate Ranking
Truck/HOV/Bus Congestion on SR and Diversions to SR134/SR2/I-210
NO Arterial/2/134/I-5 Ramp Management- Colorado, Brand, SanFernando: Congestion/Tailbacks
Colorado, Brand, SanFernando, ArterialWays – Intersections and Signals Synchronization
SanFernandoRd ArterialWay – Signals Synchronization for the Good of Northern Commuters
Thru-Traffic Congestion Sacrifices Local Traffic

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Highways
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all infrastructure road systems and individually by segments of 5000ft each within the Study Area.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Local Roads
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all infrastructure
LACo Call for Projects 2007, 2009, 2011 and after

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Mainline Railroads
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all current Mainline Railroads, rights-of-way, facilities, and capacities within the Study Area and those transportation corridors related thereto. The inventory shall also include current status and information regarding all planned and prospective new facilities (e.g., GRID, SCIG, ICTF, Colton, Mission, and Taylor yards) through the planning period up to 2035 and those expected throughout the remainder of the Project's operating life to at least 2065. The inventory must be included for Alternatives Analyses in order to support development of Alternatives related to heavy rail systems for goods, services, and passengers.

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4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Rail Transit
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all current infrastructure – rail transit, rights-of-way, facilities, and capacities within the Study Area and those transportation corridors related thereto, including prospective Gap Closures (e.g., North Gold Line to North Hollywood and Gold Line – North to South. The inventory shall also include current status and information regarding all planned and prospective new facilities (e.g., Gold Line, Orange Line, MetroLink, etc.) through the planning period up to 2035 and those expected throughout the remainder of the Project's operating life to at least 2065. The inventory must be included for Alternatives Analyses in order to support development of Alternatives related to transit rail systems for services and passengers, and perhaps goods.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Road Transit
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all current infrastructure – road transit, mixed and dedicated rights-of-way, facilities, and capacities within the Study Area and those transportation corridors related thereto, including prospective Gap Closures. The inventory shall also include current status and information regarding all planned and prospective new facilities (e.g., integrated road/rail stations for Gold Line, Orange Line, MetroLink, transit villages, inter-modal connections [MTA 256 and Gold Line], etc.) through the planning period up to 2035 and those expected throughout the remainder of the Project's operating life to at least 2065. The inventory must be included for Alternatives Analyses in order to support development of Alternatives related to transit road systems for services and passengers.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Services – Sewerage and Drainage
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all infrastructure utilities and services resources currently supporting the Study Area and those planned by State, County, and Local agencies at least through the regional planning period to 2035 and forecasted or expected throughout the typical capital project life of 2015-2065.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include all infrastructure utilities and services resources required by each Alternative and through comparisons of all Alternatives for the Project.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include comparisons of all infrastructure utilities and services resources required by each Alternative and available supporting existing and expected facilities and systems. If any alternative's utilities and services requirements cause the regional services ratios to fall below their levels of services without the Project, the Project alternative must include compensation/mitigation to raise service levels back to those expected without the Project.

5. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Mitigations
The Scoping Report, Alternatives Analyses, and EIR/EIS each must include mitigation measures for each Alternative; however, without a defined base case alternative prospective mitigation measures, activities, and compensation cannot be readily defined. MTA/CTs must provide a reasonable opportunity for the Public to participate in the Alternatives Analyses in order to provide

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the opportunity for the Public to provide Scoping inputs for each Alternative of concern for the Public as this has not been available during the "Scoping" process, Series 3 sessions.

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Alternatives – General

The Scoping Report, Alternatives Analyses, and EIR/EIS must include "all possible" transportation alternatives as emphasized throughout all Scoping Series 3, SR710 Conversations without any limits other than the Study Area figure. Therefore the Scoping Report and EIR/EIS must include the wider range of alternatives than those indicated in the NOP/NOI/Scoping listings of:

Route Neutral Surface and Subsurface Highway/Freeway
Heavy Passenger and Freight Rail Improvements
Bus and Light Rail System Improvements
Local Street Upgrades
Signal synchronization
Pedestrian and Bike Access Improvements
Traffic Management Systems
No Build

and then included all five Zones (Geotechnical/Technical Feasibility Study).

Throughout the NOP/NOI and all three series of SR710 Conversations, presentation included the federal court's review of the 1990s "Multi-Mode Low-Build" alternative which was judged not to have been adequately reviewed and appraised by CTs as part of the Federal jurisdiction.
The Scoping Report and EIR/EIS must specifically include updated Multi-Mode Alternatives even though not specifically listed by the NOP/NOI.

During the SR710 Conversations, Series 1, various "Considerations" included various additional Alternatives categories:

MultiMode Improved freeway ramp access from Foothill and LaTunaCanyon...
Freight on Rails - Improve Alameda Corridor and UP/BNSF thru SFValley to Palmdale
Fix Transit Gaps – Gold Line West Extension to Orange Line
and Rosemead/SR19 Gold Line North/South connector
Truck ban on I-210 due to road grades in excess of 2% - 710>134>I5

The Scoping Report, Alternatives Analyses, and EIR/EIS must include alternatives derived from the Series 1 Considerations.

The Scoping Report and EIR/EIS must include the following general categories of alternatives:

Tunnels with and without trucks
from SR710 South Stub to I-5, SR2, SR134, and I-210 and
from I-10 to I-210 east of Fremont Ave.
Based on MTA/PPP
Based on MTA/Parsons-Brinkerhoof Study and Geotechnical Study
Surface or Elevated Roadways with and without trucks
from SR710 South Stub to I-5, SR2, SR134, and I-210 and
from I-10 to I-210 east of Fremont Ave.
Surface and Elevated Highway Limited Connectors within the Study Area (1-2 miles)
MultiMode – Connector facilities and many other road improvements of existing facilities
MultiMode – Improvements of existing facilities without Connectors
BusRapidTransit – Road improvements focused entirely on improved bus movements
Multimodal transportation landscape of South Pasadena applied throughout the Study Area

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6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Subsurface Alternatives

Subsurface Alternatives herein do not include limited or extended "Cut-and-Cover" subsurface facilities as they are more similar to "subgrade" or "depressed section" surface freeways.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include a wide range of possible subsurface road facilities, beyond those considered under the earlier 2006 and January 2011 conceptual designs for the "Meridian" tunnel route (through the Zone 3). The Scoping Report, Alternatives Analyses, and EIR/EIS must include the Meridian Tunnel Alternatives of MTA/PPP of 2010-11 and the MTA/P-B of 2006, see figure below.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include the following subsurface, bored/mined tunnel systems for the following corridors:

1. *Far West – I-10/I-710 to south end of Mt Washington and thence to I-5 (Zone 1, southern alignment);*
2. *West – I-10/I-710 to mid west side of Mt Washington and thence to the I-5/SR2 interchange (Zone 1, northerly alignment);*
3. *West-Central – I-10/I-710 to north end of Mt Washington and thence to equivalent of Ave 38 and Eagle Rock Blvd. (north of intersection with Verdugo, southern alignment in Zone 2);*
4. *West-Central – I-10/I-710 to SR134 at San Rafael Interchange, west of I-210 (far west alignment in Zone 3, West-Garvanza)*
5. *Central – I-10/I-710 to north stub end of I-710/I-210 (St.Johns/Pasadena north of California, central alignment in Zone 3, beneath Alhambra City);*
6. *PPP Item 2 January 2011 Tunnel of 21,000 ft total project and thereby Alhambra Ave to California Blvd., X2 - x3 TBM Diam. Covers, WITHOUT connector bridges and viaducts*
7. *P-B 2006 Tunnel of 21,000 ft total project from thereby Alhambra Ave to California Blvd., X2 - x3 TBM Diam. Covers, WITH connector bridges and viaducts to the existing I-710 Stub at Valley Blvd.*
8. *East-Central – I-10/I-710 to north end of SR110 at Glenarm thence to I-210 easterly alignment in Zone 3)*
9. *West-Far East – I-10 to I-210 (Zone 3* Palm/Marengo SR110-Arroyo)
10. *Central-Far East – I-10 to I-210 (Zone 4/5* San Marino)
11. *East-Far East – I-10 to I-210 beneath Rosemead SR19 (Zone 5)*

As exampled in figure below for western two-thirds of Study Area:

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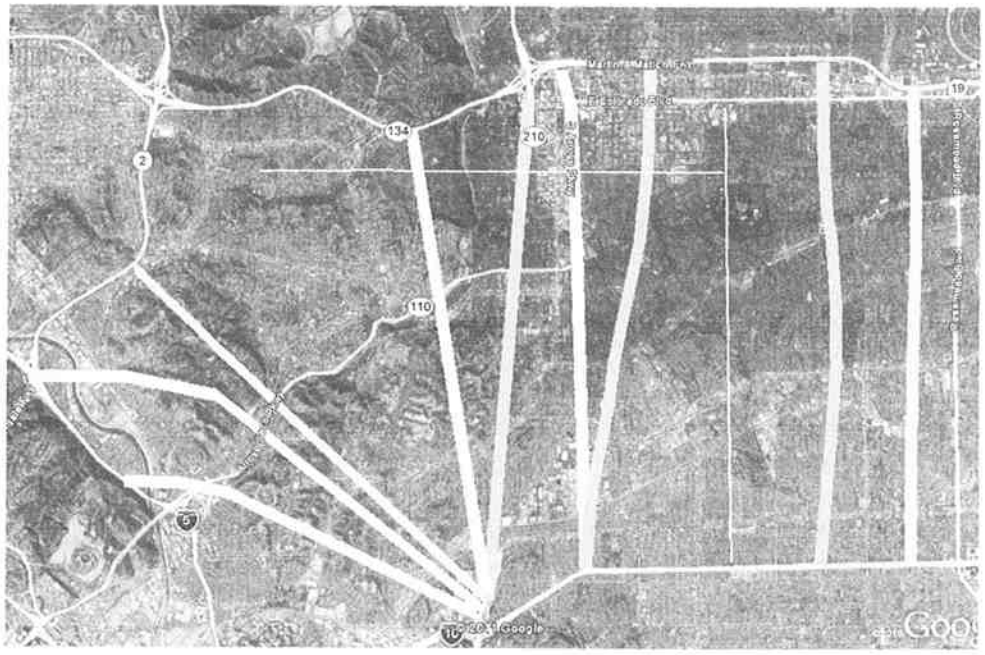

In all above subsurface alternatives, the Scoping Report, Alternatives Analyses, and EIR/EIS must include addition alternative subsets for the initial road alternative WITH and WITHOUT

Two-three times tunnel diameters for tunnel cover above the tunnel crown
Trucks and Truck Lanes and Truck Climbing Lanes
Ban Trucks of 3-4 axles and loads of 20,000 lbs gross – 3-4% Grades
Ban Trucks of 4-6 axles and loads of 40,000 lbs gross – 2% Grades
Tunnel covers of times two and times three
"Bus Rapid Transit" HOV lanes
South Portals entirely south of Valley Blvd.
*South Portals entirely south of I-10***
North Portals entirely north of California Blvd.
North Portals entirely north of I-210

***The EIR/EIS must include tunnel alternatives with portal beginning and ending south of I-10 and with tunnels beginning from the south side of I-10, leaving the existing south I-710 Stub with minor modifications for Hellman Ramp/Interchange and for Connector from Valley to West Mission Rd. in Alhambra.*

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Surface Alternatives – At Grade to +20ft above to -20ft below ground levels

Development of surface alternatives is based on the basic approach of "Let those who benefit provide the corridor and endure the solutions". As established at present and future, congestion on N-S arterials lies primarily within the city of Alhambra and thereby surface alternatives must lie within Alhambra on the south and Pasadena on north and may pass through San Marino and/or South Pasadena. No alternatives should be routed through adjacent communities without demonstrated and approved significant community benefits.

The Scoping Report Alternatives Analyses, and EIR/EIS must clearly include those surface alternatives which achieve the needs and purposes within those areas where congestion relief and other improvements are required or realized. Similarly alternatives must be excluded where those

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alternatives benefit communities beyond the project implementation areas while inflicting impacts on communities which do not realize benefits.

The Scoping Report Alternatives Analyses, and EIR/EIS must include the following N-S Full length (I-10 to I-210) surface alternatives:

West-Alhambra - Fremont /SR110 Corridor with interchanges at
- *Alhambra City - Mission Rd./Main*
- *South Pasadena - Huntington Drive or SR110*
- *Pasadena – California Blvd.*

Central-Mid Valley Corridor (New-San Marino-Ramona-Greenwood, 7mile Road w of I-605 and e of SR2) with interchanges at
- *East Pasadena*
- *East of Huntington Library*
- *San Gabriel /W.Rosemead*
- *Monterey Park (I-10)*
- *Montebello (SR60)*

Rosemead/SR19 – I-210-SR60 with interchanges at
- *I-10*
- *Mission Road*
- *Huntington Drive*

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Viaduct/Elevated Highway Alternatives (20-35ft height)

The Scoping Report, Alternatives Analyses, and EIR/EIS must include full length elevated alternatives along the same routes from I-10 to I-210:

West-Alhambra - Fremont /SR110 Corridor with interchanges at
- *Alhambra City - Mission Rd./Main*
- *South Pasadena - Huntington Drive or SR110*
- *Pasadena – California Blvd.*

Central-Mid Valley Corridor (New-San Marino-Ramona-Greenwood, 7mile Road W of I-605 and E of SR2) with interchanges at
- *East Pasadena*
- *East of Huntington Library*
- *San Gabriel /W.Rosemead*
- *Monterey Park (I-10)*

Rosemead/SR19 – I-210-SR60 with interchanges at
- *I-10*
- *Mission Road*
- *Huntington Drive*

Such elevated viaducts have been constructed in many California and other states, such as -
http://thei81challenge.org/cm/ResourceFiles/resources/Austin.pdf

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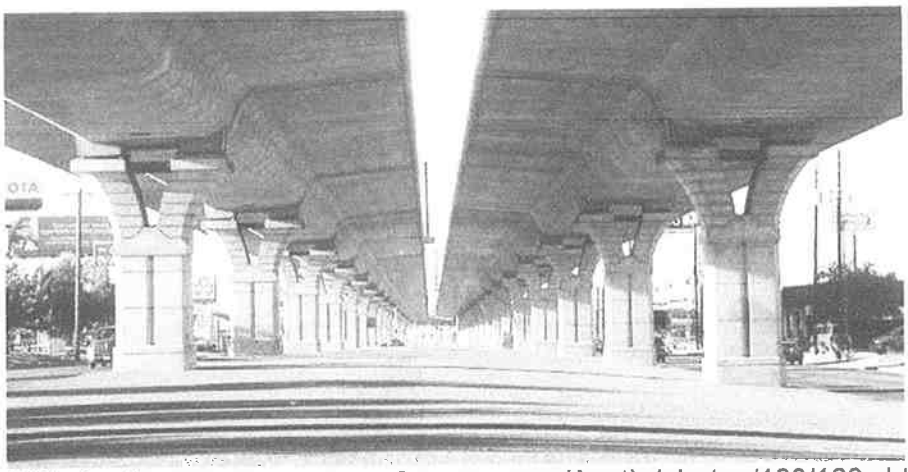

I-81, Austin http://www.texasfreeway.com/Austin/photos/183/183.shtml

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Viaduct/Elevated/Surface "Connector Roads" Alternatives

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an intermediate Build-Project Alternative including numerous highway connector elements between existing highway elements but not connecting the full N-S dimension of the Study Area; these must include as a minimum:

West- South End - Alhambra City
- *Mission Rd. and separately or combined-Mission-Meridian-Main/Huntington Drive*
- *Hellman-CSULA*
- *Hellman-Fremont (North and South of I-10)*
- *Valley-Palm/Mission-Palm/Main-Marengo/Alhambra Road*

West-North End – Pasadena
- *SR110-Arroyo-I-210*
- *SR110-SR710 North Stub*

Other prospective Connectors:

Central-Mid Valley Corridor
- *East Pasadena – I-210 to Huntington*
- *San Gabriel /W.Rosemead – I-10 to Mission*
- *Monterey Park – I-10 to Garvey*

Rosemead/SR19 –
- *I-210 to Huntingtont*
- *I-210 to Foothill/SierraMadre*
- *I-10 to Mission Road/LasTunas*

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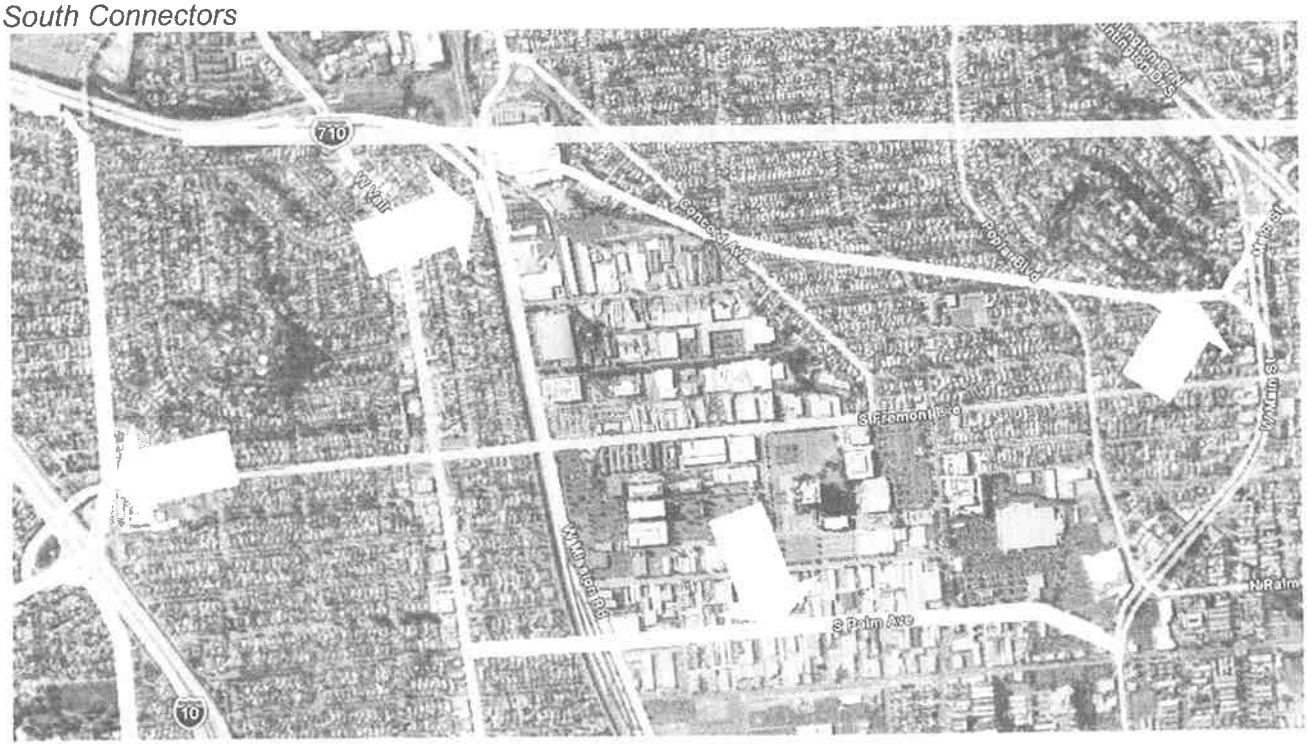
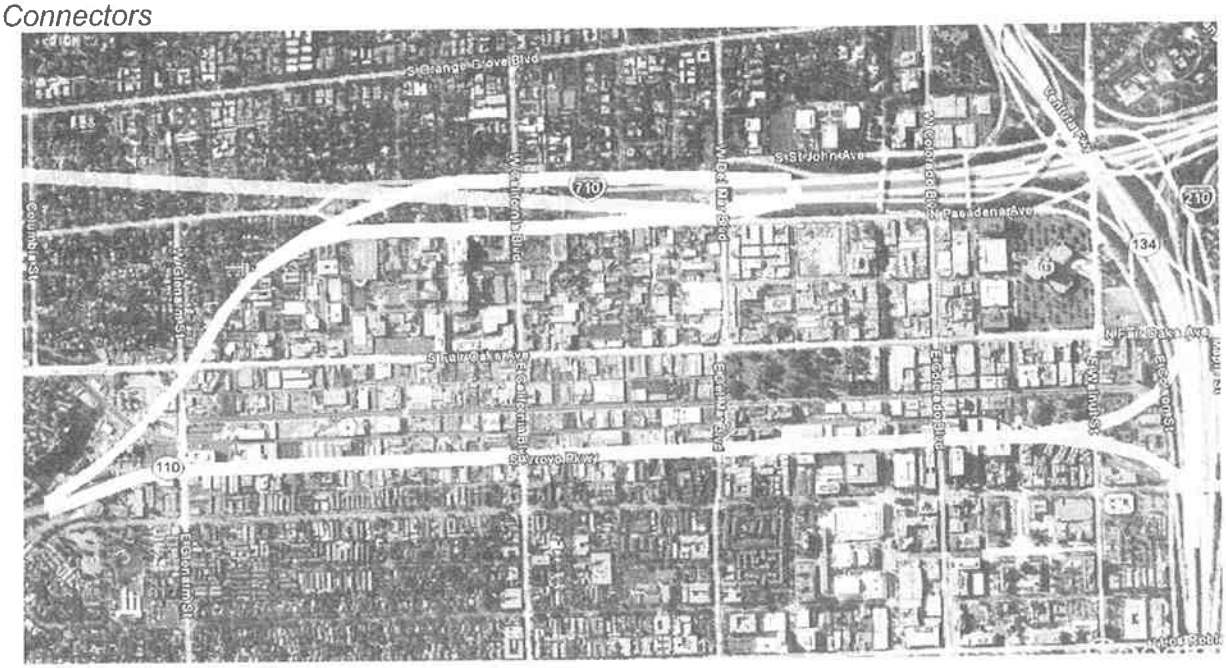
South Connectors



North Connectors



6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Bus Rapid Transit Alternatives/Multi-Occupancy Only Alternative

The Scoping Report Alternatives Analyses, and EIR/EIS must include Bus Rapid Transit (BRT) systems for both N-S and E-W corridors.

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In all above surface and elevated road alternatives, add a second alternative for the initial road alternative with a dedicated "Bus Rapid Transit" facility, and the BRTan additional alternative set for the following E-W corridors:

Marengo-City Terrace-Garvey
Main-Valley
Mission Road-Huntington Drive
Broadway-Figueroa-Monterey Road
Spring-San Fernando Road-Eagle Rock-Colorado

The BRT facility must include:

Upgrade curb lane – smooth surface, adjusted lane and curb curvature, driveway controls, overhead clearances for trees, wires, and signage
Signal Synchronization and Transit Signal Over-Rides
Out-of-Lane Stops and Stations
Integrated Multi-Road Transit Stations
Integrated Park-N-Ride Transit Stations

As a separate road alternative or as enlargement part of any MultiMode Alternative, add an alternative including fully dedicated bus-lane/BRT Corridor facilities along:

San Fernando Road-Eagle Rock Blvd.-Colorado as two-way SW-NE facility
Fremmont/Palm-Marengo as one-way couplets N/S facility
Garfield/Atlantic as one-way couplets N/S facility
Rosemead as two-way N/S facility
Valley – Main/Mission to Peck Road
Mission-Huntington Drive – Chavez to BuenaVista/Duarte

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6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Multimode Alternatives (including Transportation System Management)

The Scoping Report Alternatives Analyses, and EIR/EIS must include the following Multi-Mode systems for the illustrate ten-plus E-W and N-S corridors, see figure below

The Scoping Report, Alternatives Analyses, and EIR/EIS must include and develop a multimode approach consistent with those of MoveLA/FAST/Rand, South Pasadena, and others which usually involve several basic elements

Get Goods and Passengers on Rail
Get goods off the roads
Get passengers in multi-passenger road vehicles
Make streets, roads, freeway operate smarter – higher consistent flows
Increased passenger miles with fewer vehicles
Reduced peak-hour speeds but increased vehicle/hour and average daily trips
Price route and destination and origin parking to reflect true costs to the Public
Price fuel to reflect true environmental and infrastructure costs and impacts

MTA/CTs must include review of and assessment of application to LACounty in European urban plans to remove most light duty gas/diesel fueled individual-passenger vehicles from cities by 2035 and all individual-passenger vehicle by 2050.

The Scoping Report Alternatives Analyses, and EIR/EIS must include Important Components as well as many others:

Freight *"Zero Port Road Freight 2035"*
Gaps – BNSF/UPRR>LOSSAN > High Desert Corridor and SanLuisObispo
Passengers
Rail Transit Systems
NE-RedLine Extension through Glendale
GoldLine West Extension-Glendale/Burbank/N.Hollywood

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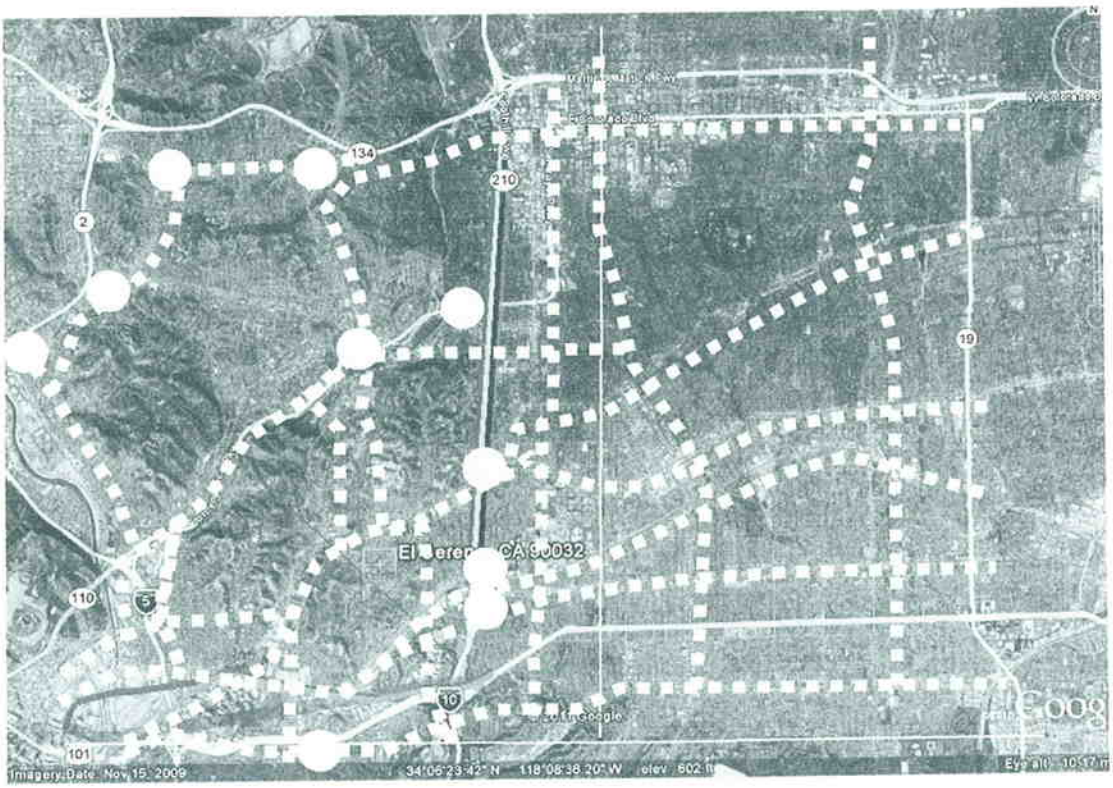
GoldLine East Grid – Whittier/Azusa N-S CrossLink
Road Transit Systems
Make Streets Work Better
Road Efficiencies
Demand Management
Parking Management
Free 1-3 hr retail parking
$25/car space-day – W of I-5, N of Slauson, E of Vermont, S of Los Feliz
Park-N-Ride – Parking Zone Perimeter of LA City as shown as example below:



Congestion Pricing for access to areas west of Par-N-Ride facilities
Similar to District Pricing (London, Singapore, HongKong, Dubai, etc.)
State/Local Registration – Full Cost Recovery for all vehicles in Study Area
LA County Fuel Taxes for a minimum of $5/gal – Gas and Diesel

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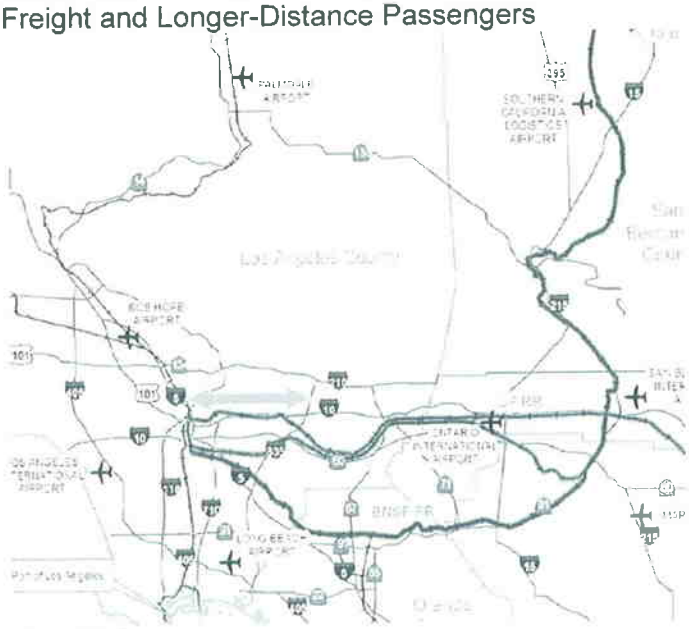
6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Rail Only Alternatives

The Scoping Report, Alternatives Analyses, and EIR/EIS must include the following Railroad Alternatives for passengers, goods and services:

- All containers on rails between ports and logistics centers in San Bernandino, Los Angeles, and San Luis Obispo counties within existing railroad corridors (e.g., Alameda Corridor Central, Alameda Corridor East, "Alameda Corridor North", Alameda/LOSSAN Corridor NorthWest, and San Gabriel River Corridor [GRID])
- Passengers on "Gap" rails –
  - Existing Gold Line west to North Hollywood-Red Line and Orange Line
  - Existing northern to existing/planned southern Gold Lines (crossing spokes) at-
    - Atlantic
    - San Gabriel
    - Rosemead or Peck
    - Easterly most boundary of illustrated Study Area, east of I-605
- Passengers on "New" Light Rails (actually returning to earlier trolley alignments)–
  - Valley
  - Huntington
  - Figueroa
  - San Fernando-Eagle Rock (connecting to Gold Line West Gap Closure

Heavy Rail for Freight and Longer-Distance Passengers



Project -- Blue double pointed arrow
Main railroads in thick red (UP), blue (BNSF), green (ACTA/UP/BNSF), and unshaded (LOSSAN) hatched lines

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7. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Methods and Approaches

The Scoping Report, Alternatives Analyses, and EIR/EIS must include quantitative and numerical analyses based on monitoring and verified numerical computerized model results. Words such as "improve", "increase", "reduce", "diminish", "degrade", etc. must be supported by numerical values and quantification with supporting evidence; qualitative measures and descriptors must not be used or incorporated. Because of the use of computer models, all programs and input files must be made available preferably online or by CD/DVDs to the Public.

All computer models must be verifiable as to their organization, use of information, and calculations and must be audited/verified by a independent specialist in each field and computer sciences/programming.

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A comprehensive listing of project and land use development dependencies (including Altadena, LaCrescenta, and Palmdale-Victorville) and assessment of growth inducements and secondary impacts both on the up- and down-stream projects.

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Needs, Purposes, Goals, and Objectives

Some EIR/EISs simply state that ANY improvement, reduction, or increase fulfills the "needs" without regard to any quantitative levels and levels of impacts.
Prior to the initiation of Alternatives Analyses, the Scoping efforts and/or EIR/EIS process must provide a single set of all needs, purposes, goals, and objectives for the SR710 general categories of include quantitative "Needs" and "Purposes"

General Regional Network – Qualitative – Goals, Needs and Purposes
General Regional Network – Quantitative – Goals, Needs, and Purposes
Regional Network – Any transport facilities considered as affected, benefited or degraded, by the absence or future presence of the SR710 North Extension
Project Area Network – Qualitative – Goals, Needs and Purposes
Project Area Network – Quantitative – Goals, Needs, and Purposes
Project Regional Network – Any transport facilities considered as involved and/or affected, benefited or degraded, by the absence or future presence of the SR710 North Extension within the Study Area of I-5, SR2, SR134, I-210, I-605, and I-10

*Based on the written "**Preliminary Purposes and Needs"** of the Scoping Sessions, the Scoping Report must clarify and incorporate the following comments by specific needs and purposes: The NOP/NOI stated only two needs and/or purposes but during agency and public scoping other needs and purposes were added in visuals and verbal presentations but without inclusion of all items in hard-copy handouts to the public. Verbal requests for copies of the presentation materials were met with responses that the client had not approved such, although they had been provided to others and include the following:*

The Scoping process has not provided a basis for proposing potential impacts, related mitigation measures and reasoned alternatives - Lack of project description – no physical project in a 100 sq mi area - created confusion as to what comments involved. Alternatives assessments and analyses must be open to all proposed alternatives and every alternative must include a Truck Ban and Truck Allowed Option with appropriate physical rather than regulatory restrictions – e.g., clearances of 12ft vs 16ft.

All needs and purposes must be formally approved by both Caltrans and MTA and must be quantified and objective and must be available and accessible via webpages to the public and must allow for full public commenting. Following such, additional appropriate alternatives can be reasonably formulated and presented. All proposed alternatives must be judged numerically against quantified N/Ps.

All alternatives must be assessed in public and in writing, recommend webpage for each and must allow for full public commenting on the alternatives and the assessment process.

SR710 North has been reviewed before the current efforts and thereby current needs and purposes must be reviewed and compared to those of the 1990-2003 and those used for the 2006 feasibility study.

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The Scoping Report must provide the historic and current needs and purposes for the SR710 "Gap Closure" and/or North Extension, compare the different sets (if different), and provide rationale for any changes from the historic sets to those proposed for the current efforts..

1. Improve regional mobility and accessibility for the movement of people, goods, and services

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels which must include existing and future "growth" levels comparable with modeled levels

Improve – existing and alternative values, criteria levels of significance to Study
Regional mobility
Regional accessibility
Movement
People – individual cars, bus, rail, and others
Goods – Containerized, bulk, or break-cargos, 3, 4,5, and 6 axled goods trucks
Services – requires definitions or sources of terms

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by numerical or percentage values.

2. Reduce circuitous out-of-direction travel on the network

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for –
Reduce – In feet, yards, - direct line, pavement lengths, travel times, etc.
"Circuitousity" – straight-line:route distances between origins and destinations
"Out-of-Direction" – shortest possible:fastest route distances for same origins-destinations
Network – any part of transportation facilities with more than 100 ADT involved in the Study Area

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for the "Network" used to establish the "routes" and distances – freeways, park-/expressways, highways, arterials, and local streets between origins and destinations

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by numerical or percentage values.

3. Reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels and specific listings for

Reduce – straight-line:route distances between origins and destinations
Congestion on Arterials – give specific classifications – Major Highways Class I or II, etc.
Congestion on Local Streets - Collectors or local streets – give specific classifications
North-South Arterials NE-NW to SW-SE respectively
Examples - San Fernando Road, Monterey Fair Oaks, Rosemead, etc. but not Huntington, Valley, Main-Las Tunas, Mission, Figueroa

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Clarify as to whether East-West arterials and local streets are excluded
Currently adversely affected – Within the context of the LA County provide basis for selection, references, and screening for adversely affected vs unaffected.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

4. Improve regional travel time savings and thereby reduce loss of productivity associated with congestion

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:
Improve – increase compared to what basis and time frames – current, 2035, or 2065
Seconds, minutes, etc.
regional travel time savings – District 7 summations, Study Area,
reduce loss of productivity – Driving, work, home and family, leisure time, etc.
associated with congestion – defined congestion and enumerate – LOS-F, F^1, F^2, F^3, F^4,etc.
All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

5. Provide additional connectivity in the regional network for use by public transit

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for
Provide – bus stops, transit station facilities, etc.
Additional Connectivity – lineal footage, ramps, etc.
Regional Network – Study Area by freeway/figure, by operational origins-destinations, etc.
Use by public transit - MetroLink, Metro heavy rail, Metro Light Rail, Metro buses, municipal buses of all cities within the Study Area.
All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

6. Improve regional and local mobile source site/air quality characteristics

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:
Improve - increases or reductions in establish air quality values
regional and local mobile source[s] – estimate individual and operating mobile categories
regional and local mobile site[s] – estimated for mobile sites – e.g., north of Glenarm to Foothill/Orange Grove in Pasadena, I-5 from I-10 to SR2, etc.
air quality characteristics – particulate matter – PM0.1, PM2.5, PM10, etc.
All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each Alternative within the Study Area and throughout the region. Criteria Levels

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must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

7. Reduce greenhouse gas emissions from mobile sources

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Reduce – as to area for categorizing – Airshed, LAMetro Basin, Project region of influence, Project study area, Project Right-of-Way, etc.

GHG Emissions – CO2, oxidized CO, and CH4 (compressed natural gas; CH4 has 20x more effect than CO2)

Mobile sources – including base-load coal-fired generation of electricity for transit, methane production and delivery into buses and other vehicles, etc.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each Alternative within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

8. Provide a project that constrains impacts in local communities to acceptable levels

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Provide a project -

Constrains impacts – Explain and quantify

Local communities – All neighborhoods with 2500ft of any alternative.

Acceptable levels – All project levels must be equal or better to existing levels.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each alternative within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

9. Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including public private partnerships

Also covered under separate comments specific to this subject.

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Develop -

Financially feasible project – Include capital, financial, and operations & maintenance costs

Consideration – Requires fully quantified costs and schedules of expenditures and revenues

Cost effectiveness – Include Cost/Benefit as the primary indicator of effectiveness

Viable funding strategy -

Public private partnerships – excluding Design and Build

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each alternative within the Study Area and any financial and funding relationships beyond the Study Area, such as facilitation of tolling on other highway elements . Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Financial Purposes and Needs
Resources, Impacts, Mitigation and Alternatives

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Written handouts of Project Purposes and Needs did not contain the same statements as presented in visual slides and repeated verbally as part of the Agency and public scoping sessions. Although direct responses to inquiries for copies of the public presentations, no copies would be provided; a copy is available through online sources at: http://www.bizfed.org/files/710NorthGap_ppt.pdf. Such online sources were not made known to or referenced for the Public. The exception (last one in listing has been discussed in a separate comment submittal and involves: **Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including public private partnerships**

The MTA Board approval of the environmental considerations for the SR-710 North Extension/Gap Closure included amendment statement to include the financial aspects. Throughout the scoping process, presentations of purposes and needs by Caltrans has included:

"Develop a financially feasible project, taking into consideration
cost effectiveness and
viable funding strategies,
including public private partnerships"

Furthermore, Caltrans recognizes the EIR category: Economic and Social Effects -

"Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. Although primarily directed at physical changes, CEQA regulations require that socioeconomic consequences of the physical change be analyzed."

"This means evaluating the impacts on an existing community, on religious practices, and on business activity brought on by the physical changes directly related to the project." (Volume 4 of the Caltrans referenced Environmental Handbook).

Therefore, CTs/MTA must provide in the Scoping Report, Alternatives Analyses, and EIR/EIS full financial analyses prepared for each alternative, including but not limited to:

Existing financial resources available and project alternatives' shares of such resources
Project alternative cost estimates
- *Life-of-Project*
- *Total Capital Costs*
- *Debt/Financing Costs*
- *Operations Costs*
- *Maintenance and Replacement Costs*

Funding strategies
- *Public Only*
- *Public-Private Partnerships as F&B, D&F&B, D&F&B&O, D&B&F&O&M*

Revenue Sources
- *Investor Assessment Only – Unsecured corporate bonds allowed*
  - *Public provides Rights-of-Way only,*
- *Public Assessment – Either separately or combined with investor assessments*
  - *LACounty Sales Taxes, Gas Taxes, Property Taxes/Fees,*
  - *Betterment District Fees, etc.,*
- *User and Beneficiary Origination Fees –*
  - *Container/Tonnage/Use Fees by Manifest- Ports of LB & LAm*
  - *Trucker Fees – fuel taxes, vehicle registration, direct user;*

Beneficiaries and Impacted SocioGroups
- *Delineate and defined existing socio-economic characteristics of those who benefit and those who may suffer impacts,*

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Delineate and defined socio-economic characteristics of those groups who benefit and may suffer impacts during the Project planning period 2015-2035,
Delineate and defined socio-economic characteristics of those groups who benefit and may suffer impacts during the life-of-project period (2015-2065+);

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Needs and Purposes and Screening

Written handouts of Project Purposes and Needs did not contain the same statements as presented in visual slides and repeated verbally as part of the Agency and public scoping sessions.

Once the needs and purposes for the Project are established and quantified as indicated as the purpose of the scoping, CTs/MTA must define and circulate sets of threshold criteria for alternatives screening comparisons of alternative achievements as compared to detriments. MTA/CTs must use these threshold criteria throughout the alternative development and screening process to ensure that the Project needs as expressed in the project needs and purposes are met for both the regional and local systems in a quantified manner.

2. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Project Description

The Project Description even within the CTs transmittal letter and attachments in the NOP/NOI for agencies contains inconsistent text descriptions as follows:

> Transmittal Letter "…710 Gap Closure Project…consists of **constructing an extension** of Interstate 710 from its existing northern terminus in the City of Alhambra to a new, yet to be determined terminus…a gap in the I-710 corridor…**distance of approximately 4.5 miles**…An **underground highway tunnel is under consideration**…may involve one of five possible route alignments."
> Attachment to above letter: "The proposed project…**may** include…surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems. local street upgrades, traffic management systems **[no mention of multimode low build considered in 1990s-2000s]** and a no build alternative…contributes to congestion on **local streets** and…**regional freeway system**. The objective…relieve congestion and improve mobility within the study area." (**emphasis added**; Mar.28, 2011)

The Scoping Report, Alternatives Analyses, and EIR/EIS must clearly provide objectives (which requires quantifications and scheduled elements) and perhaps longer term goals through the life of project, 2115 and coordination between goals and objectives and the Project's needs and purposes. These texts differ from the needs and purposes of the Public and Agency Scoping Sessions (Series 3). Here only two objectives while presentations had 8-9 needs and purposes.

As scoping is required to clearly define the Project's area and location the Initial Study Area contained in the NOP/NOI does not and the Project area contains 100 sqmi, approximately 6+mi NS x 15+mi EW while the text Description - West: SR2, North: SR134/I-210, East: I-605, South: I-10 does not conform with the Image Description -

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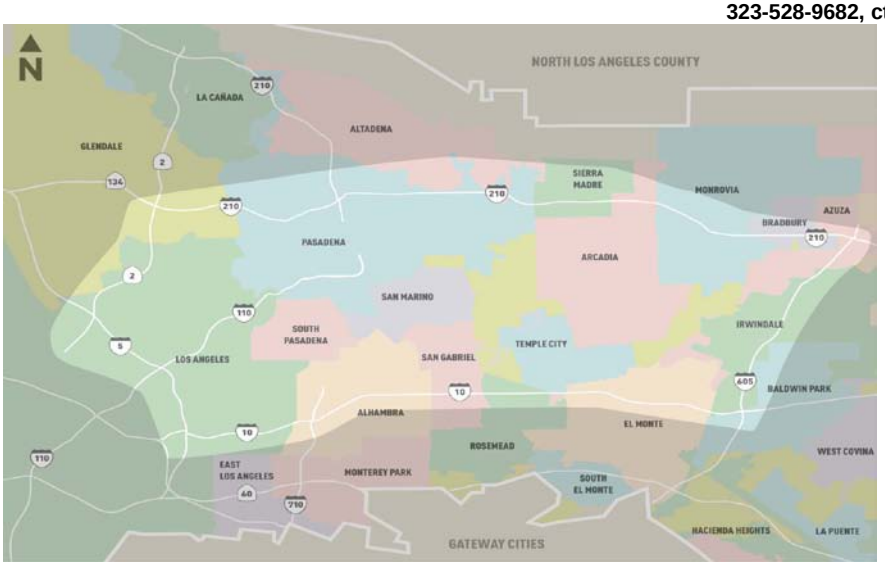

The Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must all clearly define the physical locations and the functional network elements of the Project. The current NOP/NOI and presented materials do not clearly identify the Project, description, and physical/functional locations. References to the five zones are not explained and related to the Project location(s).

The Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must include the potential Functional Systems in which the Project will function and the conditions of the same system without the Project. The Functional Systems must include any transport-related projects or systems which may influenced or affected by the proposed Project – at the levels of Metropolitan Network, Regional System, Study Area, and Corridor/Local Areas.

The Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must include the desired Operational Levels and Regulatory/Industry Standards and Requirements, such as: expected volumes/vehicles per hour per lane or maximum percent longitudinal grades for light vs heavy duty trucks and other vehicles (2%, 5%, etc. for up to 5000ft). Without such requirements, proposal of alternatives and mitigation measures cannot be adequately provided and may be unreasonable.

Materials provided do not clearly identify the Project's basic assumptions for current and future conditions related to the Project; the Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must include the basic physical, functional, economic, and financial conditions assumed for the development of the Project, Alternatives, and mitigations.

The Scoping Report, any Alternatives Analyses, and EIR/EIS must provide estimates or assumptions, such as:

- *Gasoline/Diesel Fuels of $4.50/gal by direct costs and Fuel Taxes*
- *LA City Day-Parking Fees*
- *Ports of Los Angeles and Long Beach projections of containers imports/exports*
- *So.Cal.Internatl.Gateway and Integrated Container Transfer Facility projections of containers movements*

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2. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Project Description – Caltrans Lands and Properties

As part of the Scoping Report, Alternatives Analyses, and EIR/EIS, Caltrans (CTs) must provide a map and listing of all existing CTs, State, and MTA properties which are currently unused for any public purposes, are vacant, or have been leased for non-transportation uses within the Study Area as defined in the figure above. The listing should indicate original purchase date, purchase costs, and current status, whether occupied or vacant, perhaps as of January 1, 2011.

3. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Important Known/Suspected Resources and Expected Significant Impacts

During the Series 1 sessions, many community members listed the resources considered to be important or significant within their communities, their current transportation concerns, and considerations (solutions) as to how to solve such concerns. Some of these sessions occurred before and after the date of circulation for the NOP/NOI but presenters stated that this is not part of the Scoping comments.

MTA/CTs must require incorporation of ALL public statements from participants during the Series 1 SR-710 Conversations sessions into the Scoping Report and incorporate them into the Alternatives Analyses and EIR/EIS for important environmental resources, current adverse conditions, and mitigation measures or alternatives for the Study Area, for example:

MOST IMPORTANT RESOURCES

Mission Station/Farmers Market, Station/Farmers Market Trader Joe's Home Town
Mission-GoldLine Transit Station Village
Huntington/Fremont Transit MultiFamily Neighborhood Villages (MTA258/79)
SoPas and Glendale Cities of Trees and Top-Recognized K-12 School Districts
Meridian-Garfield Historic Districts -1920-30s Old Transit Villages/Centers
Historic Districts -1920-30s Old Transit Villages/Centers
Short Line/Berkshire Historic District; Numerous Bungalow-1920-30s Transit Villages
Golf Courses, Brand, Wilderness, and other Parks, Forest Lawn, Equestrian
Great Views of SanGabriel, Verdugo, San Rafael, and Hollywood Valleys/Hills/Mountains
Green Hills - Ascot Hills, Elephant Hill, Barrett Hill, Montecito Heights, Monterey Hills
Arroyo Seco River and Valley
Small Town/Village/Hills Enclaves
Strength in Fusion – Hillside Ordinance/Manorization
Small Town/Village/Barrio Cohesion and Hill/Valley Enclaves
"Pride of Place" *1990s Env.Justice Suit Against 710 Tunnels*
Alhambra's 710 Degradation of El Sereno/Sierra Park
SoPas Isolation by Street Barriers along City Boundary
El Sereno Recreational Center/Middle School
El Sereno Downtown Planning by Community Members
Community Variety – Buddhist Temples, Korean Church and Protestant/Catholic Churches
Rose Bowl/Parade, OldTown, City Hall,
Huntington Hospital and Medical District
CSU Los Angeles, USC/LACo Medical Startup Facilities
Active BioMedical Adelante Industrial Development, CRA and Enterprise Zones
PCC-College, Ambassador and CalTech Institue
NortonSimons/Huntington Museums
South Pasadena and Pasadena City Libraries

GoldLine Transit Villages
MetroLink Transit/Amtrak Station
GridIron Roadway and Green/Walnut OneWay Couplet

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MTA Bus 256-Community Supported for 4 years
Central Access to LA, Pasadena, SanFernando Valley, Mountains, and Coast
SanFernando Road and Colorado Blvd. Arterial Ways
Transit Villages - Maycrest, Poplar, VanHorne. Eastern, Collis, Monterey Rd., Soto/Mission
Buses 78/79/256 and DASH
First Single Grade-Separated RR Crossing

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Geology, Mineral Resources, Soils and Topography

A major Study of the geology of the Study Area was conducted and resulted in a statement that all routes were technically feasible for various types of bored/mined tunneling methods. The Study also found subsurface evidence of extensions of known "active faults" but although stating that they would do surface surveys, none were undertaken and reported or documented. The geology of the eastern half Study Area is complicated in areas and at depths through which tunnels may be constructed and surface-exposed geological formation clearly show "faults", fractures, and zones of overturning of beds with significant displacement.

Although these are not formally designated as "active", the EIR/EIS must conduct a thorough underground study of any tunnel alignment with borings at no greater than 1000ft intervals and at depths of no less than 300ft below surface (e.g, based on 3x tunnel diameter of cover over a tunnel diameter of 60ft plus a margin beneath the tunnel invert/floor.
All faults, fractures with displacement of more than 1ft, and overturned folding must be further documented and incorporated into designs and mitigation for ground stability issues.

Although the geological study discussed methane gas occurrences in the borings, the information provided is inconsistent and undocumented with appropriate protocols for ground gases. Several oil/gas wells occur within the delineated study area and some are not abandoned. Gas was attributed to one formation but without appropriated documentation and apparent specialist knowledge of ground gases, composition, and characteristics.
The Scoping Report, Alternatives Analyses and EIR/EIS must be based on appropriate well-documented studies of existing well records (e.g., State DOGGR) and ground gases during every boring for any purposes. A well-qualified "gas expert" must be used and a well monitored three-point monitoring system must be used, similar to those used by MTA/RTD for the Wilshire segments of the earlier Red Line Phase 2 along Wilshire and Fairfax streets.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Structural Geology, Seismicity, Liquefaction, Subsidence, and Landslides

The earlier referenced geological study did not include appropriate geological investigations of ground stability. Geological materials may have been analyzed but the structural geology was not documented for the five zones or the current Study Area. General statements of seismicity and "active faults" did not focus on the documentation required for the EIR/EIS and especially for Alternatives Analyses.

The Alternatives Analyses and EIR/EIS must include a full geological documentation of all significant construction and all tunnels zones and corridors, including:

All faults, fractures, and complex folding – surface and subsurface evidence
Microseismic monitoring for events of <R4 (e.g., 100 seismometers)
Groundwater levels – initial and seasonal (requiring piezometers in borings)
Ground levels monitoring (all past records, quarterly and later annual measurements)

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The documentation must be based on 1000ft intervals within 3000ft of any significant construction and all tunnels.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Water Resources and Quality – Surface Waters

The Alternatives Analyses and EIR/EIS must include a thorough stormwater and waterway inventory throughout the Study Area and must be used within the Alternatives Analyses to evaluate the current storm water concerns of the Regional Water Quality Control Boards for reducing runoff and reducing pollutants to surface riverine and coastal regimes.

The Alternatives Analyses and EIR/EIS must include annual and maximum stormwater, groundwater, and wastewater generation for each alternative and the Project and any treatment required for discharge or onsite reuse.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Water Resources and Quality – Subsurface Waters

The EIR/EIS must include a thorough groundwater inventory throughout the Study Area and such information must be used within the Alternatives Analyses to evaluate the current groundwater uses and disposition concerns of the LA and San Gabriel Rivers Basins adjudication and Water Masters. The Alternatives Analyses and EIR/EIS must include an integration of the geological and groundwater studies in order to properly consider the impacts of deep construction and surface development upon the infiltration/recharge, movement, and potential uses of groundwater.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Air Pollution from Project Implementation

The Alternatives Analyses and EIR/EIS must include a thorough inventory, analyses, modeling, and assessment of air pollutant generation, air quality, and potential measures to maintain and improve current air quality. The basic approach must include the basic criterion of "do-no-harm"; existing air quality shall not be degraded and shall be improved over the planning period up to 2035 and throughout the Project's capital improvements expected operating life, 50-100 years.

The Alternatives Analyses and EIR/EIS must include air quality considerations separately for: 1) ONLY the Study area, 2) a regional consideration for those areas where a "significant" change (e.g., 5% up or down) can be documented to result directly from the Project, and 3) the Project-related air shed based on AQMD delineations (e.g., east of I-405, east of US-101, north of I-105, etc.).

At this time, changes in traffic are expected in the I-5 and northern I-210 corridor airsheds based on regulatory changes of truck traffic. The Alternatives Analyses and EIR/EIS must include separate assessment of traffic generated air pollutants based on Alternatives including any regulatory constraints and requirements on modes of traffic (e.g., Truck Bans on LA downtown I-5) rather than physical attributes of the Project (e.g, height clearance, lane widths, grades, etc.)

The Alternatives Analyses and EIR/EIS must include considerations of air pollutants generated during both construction and operations of any "build" alternative. Air pollutant generation would generally correspond to the construction value and duration while operations generation would

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generally correspond to the number and types of vehicles, not directly related to the distances and number of passengers and/or volume of materials moved.

Existing Setting - Conditions and Resources

As generally accepted, the Los Angeles Metropolitan area and the project area has been historically and for the foreseeable future (>2030) the worst air quality in the United States, and some have recommended a special category for California's South Coast Air Basin. Similarly the South Coast Air Basin (LAB) has the worst road congestion in the US and especially when adjusted for population resulting from the long distant commutes by mostly single occupancy vehicles even with the most stringent emission controls for mobile sources in the US.

The project area of about 100sq mi is largely residential or mixed residential and light commercial land uses. The project is delineated by major congested freeways and interchanges which contribute to the degraded air quality within the study area and the Air Basin, as a whole. Most cities and communities of the project area have numerous mixed multi-family and commercial arterial corridors, except for Pasadena which has a more traditionally defined central business district. Previous studies have shown more polluted air quality along I-210 east of the I-710 interchange and around the I-605/I-10 interchange compared to the eastern half of the Study Area and to the somewhat more degraded air quality in the western third of the Study Area; all levels in the Study Area are noticeably less air polluted than the I-710 corridor south of SR60.

The Alternatives Analyses and EIR/EIS must include detailed 1000-2000ft interval model cells with appropriate inventory information to support such modeling results to establish both short and longer term air quality intervals for current conditions. These results on say a 1500ft grid must then become the criteria levels for comparisons of impacts; any exceeding of the existing air quality would be considered as significant. Similarly, based on the AQMD plans and projections of air quality, modeling of future air quality through 2035 must maintain or improve (reduce pollutants) air quality without the Project, and the Alternatives Analyses and EIR/EIS must include modeling results to show that the Project would generate air quality levels equal or below the expected local air quality based on the AQMD plans through 2035.

Few industrial zones exist within the project area and are generally concentrated along the historic railroad corridors: near San Fernando Road, Monterey Road, Mission Road, and Valley Blvd. Most industrial areas are considered as light to medium industries and integrated through community redevelopment authorities; no heavy industrial land uses exist within the project area.

The Alternatives Analyses and EIR/EIS must include the many structured, combined, and unstructured "Sensitive Receptors" contained Study Area such as:

> *CalTech, CSULA, PCC, Occidental College, LACC/Fletcher Campus, Ambassador College, Adelante/USC-Biotech, Huntington Hospital, Alhambra Hospital, LACounty/USC Medical Center, Southwest Museum, Norton Simon Museum, Huntington Library, Old Town Pasadena, Schools (K-12), Churches/Temples/Mosques, Clinics, Parks, and Golf Courses (SoP, Alh), and Rose Bowl Parades (Pas).*

As throughout the South Coast Air Basin, the predominant sources of air pollutants are transportation facilities, such as:

> Congested SR2, SR19, SR110, SR134, I-5, I-10, I-210, I-605, and I-710 ROWs/Interchanges,
> Union Pacific and BNSF Railroads' ROWs and Yards (SCIG, ICTF, Hobart, etc.),
> Taylor Yard/MetroLink (SanFernando Rd.), Mission Road Yard, Hobart, and Valley/AlhambraAve. Sidings.

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Few fixed or area industrial air pollutant sources exist:

Pasadena Power Plant-FairOaks/Glenarm (Pas),
Humboldt/Ave33 (LA), Valley/Medford/Fowler (LA), Mission Ave./Soto/Valley (LA),
Sycamore/Pasadena (SoP),
Westminister/Raymond/Mission Road (Alh),
Baldwin/Lower Azuza (Ros/ElM), East of Peck Rd. (ElM).

The Alternatives Analyses and EIR/EIS must contain:

Full inventory of all known/permitted and anticipated (=future) fixed air pollutant sources,
Full inventory of all known area and line air pollutant sources and estimated air pollutant generations from all area (>10ac) and line sources of air pollutants,
Full inventory of all known and expected sensitive receptors and corridors in the Study Area and additional detailed inventories for individual receptors within 5000ft of any major (>$200M capital works costs) project facilities
Monitored and recorded air quality within the project area – monthly/seasonal ranges and resolution of at least four monitoring sites per square mile (less than 3000ft separation),
Calibrated and modeled air quality within the project sectors and area – monthly/seasonal ranges and resolution of at less than 1000ft separation,
Urban Air Shed Model for project area and 5mile zone of influence, especially upwind – westerly – downtown – including worst-case (maximum), median, and quartile wind circulation/mixing conditions for study area

The Alternatives Analyses and EIR/EIS must include full weather (T/RH/WDir/WSpd) and air pollutant monitoring of all expected pollutants and precursors (e.g., CO, NOX, VOC, PM10/2.5/0.1,etc.) on a one-mile grid for at least one year and at least 1/month ballon-survey of stratification of weather and pollutants up to 1000ft above highest point in study area; conduct monthly airborne LIDAR surveys for particulates and NOX.

Potential Significant Impacts

The Alternatives Analyses and EIR/EIS must provide and compare existing, no-build future, base-case build alternative, and other alternatives for differences and changes of air pollutant emissions and resulting regional and local air quality within the project study area.

The Alternatives Analyses and EIR/EIS must include:

Projected future air pollutant generations from all area and line sources of air pollutants for No-Build-, Build-Base-Case-, and Other-alternatives ,
Seasonal and Annual air quality within the project area – monthly/seasonal ranges and resolution of four modeled sites per square mile throughout construction periods and for Year Two and 2035 year operations
Modeled air quality for each alternative within the project area – monthly/seasonal ranges and resolution of at less than 1000ft separation within 5000ft of the alternatives' operation influence

The Alternatives Analyses and EIR/EIS must identify those:

Significantly Impacted Communities - 10 highest levels of changes above existing levels for any areas of 100 acres (1000+ft radius from model points)
Affected Communities - - Upper quartile levels of changes above existing and future no build levels for any areas of 100 acres (1000+ft radius from model points)
Less Affected Communities - all areas with less than 25% increase from existing modeled levels

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Less benefited communities - all areas within less than 25% decrease from existing modeled levels

Beneficiary Communities - 10 areas with most reduced air pollutant levels below existing levels for any areas of 100 acres (1000+ft radius from model points)

The Alternatives Analyses and EIR/EIS must include and identify those areas with any increased air pollutant levels (reduced air quality) which include single "sensitive receptor" as listed above. The EIR must identify also identify those areas within the upper 10 highest increased air pollutant and contain any "sensitive receptors" within 5000ft radius. The EIR must include a "Health Risk Assessment" for any area with one "sensitive receptor" and must include a "Health Impact Assessment" for 1) any of the ten highest increase areas with at least one "sensitive receptor", 2) and for any increase-areas with more than one "sensitive receptor", and 3) areas with two highest levels and two highest increases in pollutant levels.

If an alternative has fixed sources of emissions, all sources must be assumed to be worthy of "hot spot" modeling of the emissions and air quality degradation. If modeling indicates any increases in air pollutants, the alternative must include mitigation to collect and treat air pollutants before emissions. Fixed sources in any alternative shall not be designed to reduce ground levels to existing emissions levels by elevating, heating, or increased fan velocity in order to dilute the pollutant levels; the solution to air pollution shall not be by dilution and shall be achieved by treatment/removal of pollutants.

Potential Significant Benefits

As indicated above, the Alternatives Analyses and EIR/EIS must include and identify "Beneficiary Communities (areas or zones)" within the project area and within 10,000 ft of the project area and quantify levels/estimates of improvements. If improvements occur or are expected to occur at greater than 10,000ft from the project area boundary, further studies and identification must be required.

Prospective Mitigation Measures/Activities

The EIR/EIS and Alternatives Analyses and assessments must protect Air Quality within the Air Basin. Any Alternative which increases air emissions and degrades air quality within the project area and modeling areas must include mitigations to return the area air quality to the existing ambient levels and their continued declines throughout the mid-term period up to 2035 and to meet the SCAQMD's planned achievements for 2035.

If "Hot Spots" analyses and modeling of any alternative indicate increases affecting "Sensitive Receptors", The Alternatives Analyses and EIR/EIS must include mitigation to return the air quality modeled levels to pre-existing levels equal to the 2012 ambient, and the mitigated alternatives must include receptor protection measures (e.g., air conditioning, filtration of intake air, interior air filtration, etc.) to mitigate any risk of failure by the source mitigation.

If alternatives have fixed emissions sources (e.g., any device using fans, vent stacks or "natural venting" through portal openings), all fixed emissions must be treated before release and shall not be "treated" by dilution to reduce the pollutant emissions levels.

The Alternatives Analyses and EIR/EIS must include the following mitigation measures, as part of mitigation for contained facilities, electrostatic precipitators and associated particulate filtration down

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to PM0.1 with removal/treatment efficiency sufficient to reduce any tunnel alternatives' emissions to equivalent to surrounding existing air quality without project.

The EIR/EIS must include the following be completed: an HRA and a socioeconomic impact study.
The EIR/EIS must include the following be identified and studied: air pollution impacts; global warming impacts; noise standards and noise impacts; growth impacts; construction-related impacts; aesthetic impacts; traffic impacts; maintenance and operation impacts; and impacts to the storm water runoff and discharge.
The EIR/EIS must include the document will include Air Quality and HRA and The EIR/EIS must include and assess concerns with the future highway projects not increasing traffic, air quality, and health impacts.
The EIR/EIS must include the following: a detailed analysis of the effects of diesel particulates on those living and working near the project; evaluation and examination of all potential health effects caused by the project; discussion of traffic-inducing and congestion-producing impacts; discussion of irreversible impacts to habitat, navigable waterways, recreation resources, and water quality; and growth of goods movements infrastructure at the ports and in the Inland Empire.
The EIR/EIS must include information about what trees will be considered to make the freeway more attractive and voiced support for designated truck lanes and limited access.
The EIR/EIS must include and assess information about a fuel-saver transit system in response to a need for public mass transit, pollution from diesel trucks, and traffic congestion.
The EIR/EIS must include previous documents and studies be considered. The EIR/EIS must include and assess with air quality, cost benefit analysis, global warming, and noise.
The EIR/EIS must include and assess with noise and decrease in housing and quality of life.
The EIR/EIS must include and assess with public notification in the Study Area, traffic congestion from trucks, health impacts, and zero emissions.
The EIR/EIS must include the EIR analyze a zero-emissions alternative.
The EIR/EIS must include and assess with health impacts and community participation framework.
The EIR/EIS must include and assess with health impacts in proximity to freeway, a threefold increase in trucks, and the availability and legal documentation of the NOP posting for the proposed project.
The EIR/EIS must include a tree planting project be incorporated into the project to reduce pollution and noise.
The EIR/EIS must include cul-de-sacs created by the project be used as opportunities for the community gardens, tree planting, and daycare centers.
The EIR/EIS must include and assess with air pollution and health impacts.
The EIR/EIS must include and assess with more pollution and SR710/I-10, /SR110, and /I-210 connection.
The EIR/EIS must include and assess with air quality impacts and reduction of diesel particulates.
The EIR/EIS must include and assess with pollution, noise and impacts to parks.
The EIR/EIS must include and assess with air quality and improvements for Study Area railyards (Mission, Taylor, and Aurant/Alhambra Rd.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Air Resources - Noise

The Scoping Report and EIR/EIS must include a thorough and comprehensive monitoring of existing noise levels at more than 20 different locations for each alternative at daily, hourly, and instantaneous/peak (10 sec.) intervals within the project area and similar monitoring wherever

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modeled traffic would increase over those at present. The Scoping Report and EIR/EIS must include inventory of all noise sensitive land uses including but not limited to the following:

Medical, Senior Care, and Children Care facilities and complexes
Religious and cultural facilities
Educational, scientific, and research facilities,
Recreational facilities and Parks
Major population concentrations – transit stations, commercial centers

The inventories must include daily, hourly, and peak/maxima levels within the sensitive facilities

The Scoping Report and EIR/EIS must include modeling of noise generation and projections within 1000ft of any project elements in each alternative for both construction and operations. If modeling showed any increases within the initial zones, the zones should be expanded to the limits of any increases within and beyond the initial zones.

If noise levels are found to exceed those during the monitoring period, the Scoping Report and EIR/EIS must include, as part of mitigation for contained and open road facilities, noise absorption and reflective measures with treatment efficiency sufficient to reduce any alternatives' generation to equivalent to surrounding existing noise quality without project.

The Scoping Report and EIR/EIS must include adequate mitigation for any increases over the ambient noise levels by either controlling sources, interfering with noise transmission, or protecting sensitive receptors.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Air Resources - Vibrations

The Scoping Report and EIR/EIS must include a thorough and comprehensive monitoring of existing vibration levels at more than 20 different locations for each alternative at daily, hourly, and instantaneous/peak (10 sec.) intervals within the project area and similar monitoring wherever modeled traffic, transit, or other vibration sources would increase over those at present. The Scoping Report and EIR/EIS must include inventory of all vibration sensitive land uses including but not limited to the following:

Medical, Senior Care, and Children Care facilities and complexes
Educational, scientific, and research facilities
Major population concentrations – transit stations, commercial centers

The inventories must include daily, hourly, and peak/maxima levels within the sensitive facilities

The Scoping Report and EIR/EIS must include modeling of vibration generation and projections within 1000ft of any project elements in each alternative for both construction and operations. If modeling showed any increases within the initial zones, the zones should be expanded to the limits of any increases within and beyond the initial zones.

If vibration levels are found to exceed those during the monitoring period, the Scoping Report and EIR/EIS must include, as part of mitigation for contained and open road facilities, vibration absorption and isolation measures with treatment efficiency sufficient to reduce any alternatives' generation to equivalent to surrounding existing vibration regimes without project.

The Scoping Report and EIR/EIS must include adequate mitigation for any increases over the ambient vibration levels/regimes by either controlling or isolating sources, interfering with vibration transmission, or protecting/isolating sensitive receptors, facilities, and equipment.

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4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Cultural, Archeological, and Historic Resources

Approximately 10 years has passed since Caltrans completed an updated survey of historic resources in Pasadena. Obviously, a large number of additional structures will have reached the 50-year mark and will need to be researched.

Because of the potential adverse impacts on possible National Register eligible properties, the Scoping Report and EIR/EIS must include a careful and thorough historic survey within 1000ft of any proposed facilities or alternatives of the Project under consideration. The survey of historic properties must be done by an experienced historic preservation consultant – and in cooperation with State Office of Historic Preservation, Pasadena Heritage, South Pasadena Preservation Foundation and Los Angeles Conservancy.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Hazards - Accidental, Natural, and Targeted Events

The Scoping Report and EIR/EIS must include a full and thorough inventory, analyses, and assessment of hazards from accidents, natural events, and targeted events ("events") that could be expected during both construction and operations of any "build" alternative. In general, events would generally correspond to the construction activities and duration, while operational events would generally correspond to the number and types of vehicles, not directly related to the distances and number of passengers or volume of materials moved. Accidents would be more numerous as the modes become mixed: motorcycles, sedans, SUVs, vans, mini-buses, full-buses, light and heavy pickups, long-distance buses, and 3,4,5,6-axled trucks, while flow/capacity generally related in a direct positive manner to accidents. Other targeted events relate to very different factors but would generally relate positively with vehicular volume/flow and perhaps to larger vehicles with larger on-board fuel tanks.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include review of natural events, earthquakes, rain storms, droughts, wind storms, etc., for the Study Area which could be expected within the project operational life span, 50-100 years for major capital projects. The Scoping Report and EIR/EIS also must include review of human/urban events, traffic accidents, pedestrian suicide attempts, etc., for the Study Area which could be expected within the project operational life span, 50-100 years. As the latter occur on a daily basis,

As generally accepted, the Los Angeles Metropolitan area and the Study Area has historically had a few significant accidents within road tunnels as most "tunnels" are short and through-passage is rapid (seconds to minutes). As these accidents have occurred they could be considered as a minimum level of involvement and not a worst case event.

The Scoping Report and EIR/EIS must include review of accidental events, including a worst case of two light vehicles and two heavy duty vehicles with a total fuel spill of 150 gallons, and worst case natural events (e.g., >6R earthquake on the Raymond Hill or Alhambra Active Faults at depths of less than two miles with periods of 2 minutes) for any alternatives.

So far, no reported significant "targeted event" has occurred in California although many suitable targets exist.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include a base case intentional "targeted event" which can be based on the following:

Two light duty vehicles – moving through the project facilities each way (total: four vehicles)

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Each vehicle carries two drums of fuel in rear compartments with attached road flares
Vehicles release their ignited road-flare on fuel drums onto pavement with maximum longitudinal grades and speed away, occupants vacate thru nearest emergency exits or sacrifice.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Landuse Compliance and Suitability

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all existing landuses and relationship of existing landuses and existing landuse plans for the Study Area. The inventory must also include all known transportation origin and destination studies related to the Study Area, including any origins, any destinations, and any pathways passing through any part of the Study Area. The inventory must further include all project landuse and demographic related growth during the current planning period up to 2035 and expected for the life of project, up to 2065.

Landuse growth beyond 2035 must consider the assumed costs and availability of fuels for goods and passenger transport by light and heavy duty vehicles compared to road and rail transits.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: SocioEconomics – Costs/Employment

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all existing and future CTs, MTA, and State properties within the Study Area and within 1000ft of any proposed facilities. As part of the inventory, all existing occupants, residents, and site workers must be interviewed and any cultural concerns, comments, and issues must be collected and incorporated into cultural assessment of existing conditions and how any particular project alternative may influence the cultural aspects of those involved in past and current property and community resources of public properties.

An inventory of all vacant and/or leased-rented properties must also include their current/2011 valuations and current revenues and expenditures.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventories of jobs and employment for heavy construction and for transit and vehicle operators and maintainers within the Study Area, Region, and County. Projected employment for Project related jobs must be quantified and located as to the Study Area, Region, and County.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include a full economic analyses of Study Area and Regional conditions and economic and employment resources and opportunities and given current conditions an assumed economic constraints of local, county, regional, and state resources for both the planning period to 2035 and the life of project period to 2065.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all tolled transportation facilities within LA County, SoCal/SCAG area, California, and the western US and their charges, lengths, capacity and Levels of Services.

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4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: SocioEconomics – Environmental Justice

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all existing and future CTs, MTA, and State properties within the Study Area and within 1000ft of any proposed facilities and the ethnicity and income characteristics. As part of the inventory, all existing occupants, residents, and site workers must be interviewed and any cultural concerns, comments, and issues must be collected and incorporated into cultural assessment of existing conditions and how any particular project alternative may influence the cultural aspects of those involved in past and current property and community resources of public properties. The Scoping Report, Alternatives Analyses, and EIR/EIS must include an assessment of environmental justice issues within and amongst the State owned properties' tenants, renters, leasees, and occupants based on direct interviews and audited records and assessed conditions, valuations, and terms/conditions.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include comparisons of environmental property conditions amongst the various communities within the Study Area and assess whether preferential treatments have been administered for those involved.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory and assess the identified "Beneficiary Communities (areas or zones)" within the Study Area and LA County and quantify levels/estimates of transportation improvements. If improvements occur or are expected to occur beyond the Study Area, further studies and identification shall be required to inventory and assess prospective improvements. If improvements are generally restricted to the Study Area or if portions of the Study Area (eastern vs western) show statistically significant differences, further studies of improvements vs ethnicity/incomes/employment must be undertaken.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Secondary, Indirect Impacts Growth Inducements

Either as a Freeway or Tunnel systems, any infrastructure transportation road improvements are to serve areas well beyond the limits of the improvements, and to integrate with other projects which are planned, underway, or completed as an overall program or system. Therefore by the very nature of roadway (infrastructure) projects, secondary and/or indirect impacts (both beneficial and detrimental) are generated for area outside of the direct project area.

The SR710 is such a project and will generated secondary and indirect impacts outside of the limits of the physical project. Some such impacts are further identified as "growth inducements" where the intentional or unintentional consequences of the project spur the development of currently undeveloped lands within the project's "service areas" (e.g., Altadena, La Crescenta, LaCanada-Flintridge, NE San Fernando Valley, Mint Canyon, Canyon Country, Palmdale, etc.).

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all areas which will derive any discernible improvement of transportation conditions due to each Alternative both within and beyond the Study Area. Specifically special studies must focus on:

Ports of LA and Long Beach,
near dock areas south of I-5,
I-710 corridor (including 15,000ft either side) from the ports to I-10,
I-210 corridor (east and north, I-605 to I-5),
I-5 (I-605 – SR14) and SR14
High Desert Corridor and SR138

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As the project's life extends throughout the current forecast period of the So.Cal.Assoc.Govts. and actually well beyond 50-100 years, major secondary growth inducement impacts can be expected as typical of any such roads project. As this particular project has been deemed so vital to the entire regional transportation region (e.g., entire San Gabriel Valley, 210 Corridor/Eastern San Fernando Valley, and Palmdale), the impacts of its implementation may have even more spectacular effects in the region and well beyond the 100 sq mi "Initial Study Area".
The Scoping Report, Alternatives Analyses, and EIR/EIS must include a thorough inventory, assessment, and beneficiary projections for all area related to any transportation systems passing through the Study Area. MTA/CTs may consider these areas for prospective beneficiary assessment for the costs of construction and operations and maintenance. Such areas must also be assessed for potential Environmental Justice issues.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure – General Transportation

The Scoping Report, Alternatives Analyses, and EIR/EIS must provide all transportation assumptions for the planning (2035) and life of project period (2065) for each Alternative:

Fuel Prices
Parking Prices
Parking/Unit Requirements
Labor costs
Origins/Destinations
Passenger and Goods projections

During the SR710 Conversations - Series 1 Sessions, the Public provide many transportation concerns and issues.
The Scoping Report, Alternatives Analyses, and EIR/EIS must include individually reviewed, compiled, and assessed of the concerns as part of the general review of transportation and their relationships to each Alternative, include the following:

Freeway Butchery – Northern and Southern South Pasadena
Truck/HOV/Bus Ban on SR110
N/W Bound Trucks on I-210 Avoiding I-5 – AND >2% ROAD GRADE – NO CLIMBING LANES NOISE/DIESEL ON BOTH SIDES
SR134/210 CONGESTION AND RAMP TAILBACKS – HOV/LOS F 330-630pm
SR110>OrangeGrove Freeway SR/Fremont/Columbia>Pasadena>710Stub SR110>Arroyo/Marengo
SAN GABR. VALLEY/MONTEREY HILLS COMMUTERS IN SINGLE OCCUPANT CARS
Lack of SCAG/MTA Coordinated Planning in Open/Transparent Manner – I-5/ExpressLanes
Lack of SCAG/MTA Coordinated Transportation Plan for Regional Rail/Road Commuter Routes
Lack of SCAG/MTA Coordinated Plan of Rail Transportation in Open/Transparent Manner
Lack of SCAG/MTA Coordinated Plan of Rail Transportation for Container Freight
Lack of SCAG/MTA Fuel Taxes and Plans for Transportation/Landuse Planning
Losses of DASH/MTA Feeder and Workers' buses - <25% San Gabriel Bus Commuters
Lack of SCAG/MTA Fuel Taxes and Parking Fees for Transportation/Landuse Planning
Inadequate Last Mile Transport feeders (DASH, etc.) and Pedestrian/Transit Villages/Centers.
W-E Commuters based on single occupancy vehicles – 95% on Huntington, Valley, and Figueroa
LA DoT pays for 85% of commuters from east of the 710 Corridor – Let the Beneficiaries Pay – Need congestion pricing zone for non-transit passengers = ExpressDistricts
Cheap downtown parking rewards single occupancy commuters, low income forced to transit
Past fuel prices supported single occupancy WSGValley vehicles and higher transport O&M for LACity; future much higher fuel prices must be reflected in transport
Lack of Connector Road to Mission Road, not Alhambra Ave., Shared Sacrifices.
Lack of Alhambra congestion reduction measures, purposefully making worst, to get ???

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Lack of Fed, State, LACo funds = PPP + Traffic Assessment/Parking Districts + Congestion $20-Tolls.
Freeway Butchery – Via SR110 – Northern/Southern and SR710 Eastern/Western South Pasadena –SR2, SR134, I-5, and I-210 –FarWest, SouthCentral, NorthCentral, East, & North – I-10 City Terrace/Ramona Gardens - Marengo-CityTerr.-Ram.-Garvey
SR110 Truck/HOV/Bus Ban forces traffic to Figueroa and Huntington
Truck/HOV/Bus Ban on SR110 and Diversions to Figueroa, Monterey Road, and Fremont/FairOaks
SR110/Fremont/FairOaks/Garfield Congestion/Ramp-Tailbacks(OrangeGrove and FairOaks)
NO Arterial Management for Fremont, FairOaks, Garfield, Huntington, and Monterey Road
Orange Grove Freeway – Signals Synchronization for Pasadena/Fremont Thru Commuters (5-7%,
Huntington Freeway – Signals Synchronization for the Good of San Marino Commuters (5-7%, 2+)
Huntington and Monterey Rd Thru-Traffic Congestion Sacrifices Local TrafficMTA GoldLine – Disregard of At-Grade Crossings and Lack of Parking Poor ADA Compiance
Poor MTA Thru-Bus Routings Lack of Adequate Feeders/Shuttles – First/Last Miles Connections
Protecting N-S Route of Bus 258…Ridership/Productivity/Service
Poor MTA Thru-Bus Routings Lack of Adequate Feeders/Shuttles – First/Last Miles Connections
Lack of Local Feeders/Shuttles for NE/SW MultiFamily Villages - First/Last Mile Problems
Historic SoPas Isolation/Segregation from LA, El Sereno and Garvanza
Historic Separation/Isolation of Multi/Single Family Developments
LACK of CaHSRA Coordinated Plan of Routing/Stations in Open/Transparent Manner
Commuter GAPS - <10% Multi-Occupancies – Few Car/VanPools
Caltrans' GAP – SR2 and SR-134 why not Interstate Ranking
Truck/HOV/Bus Congestion on SR and Diversions to SR134/SR2/I-210
NO Arterial/2/134/I-5 Ramp Management- Colorado, Brand, SanFernando: Congestion/Tailbacks
Colorado, Brand, SanFernando, ArterialWays – Intersections and Signals Synchronization
SanFernandoRd ArterialWay – Signals Synchronization for the Good of Northern Commuters
Thru-Traffic Congestion Sacrifices Local Traffic

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Highways
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all infrastructure road systems and individually by segments of 5000ft each within the Study Area.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Local Roads
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all infrastructure
LACo Call for Projects 2007, 2009, 2011 and after

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Mainline Railroads
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all current Mainline Railroads, rights-of-way, facilities, and capacities within the Study Area and those transportation corridors related thereto. The inventory shall also include current status and information regarding all planned and prospective new facilities (e.g., GRID, SCIG, ICTF, Colton, Mission, and Taylor yards) through the planning period up to 2035 and those expected throughout the remainder of the Project's operating life to at least 2065. The inventory must be included for Alternatives Analyses in order to support development of Alternatives related to heavy rail systems for goods, services, and passengers.

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4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Rail Transit
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all current infrastructure – rail transit, rights-of-way, facilities, and capacities within the Study Area and those transportation corridors related thereto, including prospective Gap Closures (e.g., North Gold Line to North Hollywood and Gold Line – North to South. The inventory shall also include current status and information regarding all planned and prospective new facilities (e.g., Gold Line, Orange Line, MetroLink, etc.) through the planning period up to 2035 and those expected throughout the remainder of the Project's operating life to at least 2065. The inventory must be included for Alternatives Analyses in order to support development of Alternatives related to transit rail systems for services and passengers, and perhaps goods.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Road Transit
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all current infrastructure – road transit, mixed and dedicated rights-of-way, facilities, and capacities within the Study Area and those transportation corridors related thereto, including prospective Gap Closures. The inventory shall also include current status and information regarding all planned and prospective new facilities (e.g., integrated road/rail stations for Gold Line, Orange Line, MetroLink, transit villages, inter-modal connections [MTA 256 and Gold Line], etc.) through the planning period up to 2035 and those expected throughout the remainder of the Project's operating life to at least 2065. The inventory must be included for Alternatives Analyses in order to support development of Alternatives related to transit road systems for services and passengers.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Services – Sewerage and Drainage
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all infrastructure utilities and services resources currently supporting the Study Area and those planned by State, County, and Local agencies at least through the regional planning period to 2035 and forecasted or expected throughout the typical capital project life of 2015-2065.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include all infrastructure utilities and services resources required by each Alternative and through comparisons of all Alternatives for the Project.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include comparisons of all infrastructure utilities and services resources required by each Alternative and available supporting existing and expected facilities and systems. If any alternative's utilities and services requirements cause the regional services ratios to fall below their levels of services without the Project, the Project alternative must include compensation/mitigation to raise service levels back to those expected without the Project.

5. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Mitigations
The Scoping Report, Alternatives Analyses, and EIR/EIS each must include mitigation measures for each Alternative; however, without a defined base case alternative prospective mitigation measures, activities, and compensation cannot be readily defined. MTA/CTs must provide a reasonable opportunity for the Public to participate in the Alternatives Analyses in order to provide

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the opportunity for the Public to provide Scoping inputs for each Alternative of concern for the Public as this has not been available during the "Scoping" process, Series 3 sessions.

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Alternatives – General

The Scoping Report, Alternatives Analyses, and EIR/EIS must include "all possible" transportation alternatives as emphasized throughout all Scoping Series 3, SR710 Conversations without any limits other than the Study Area figure. Therefore the Scoping Report and EIR/EIS must include the wider range of alternatives than those indicated in the NOP/NOI/Scoping listings of:

Route Neutral Surface and Subsurface Highway/Freeway
Heavy Passenger and Freight Rail Improvements
Bus and Light Rail System Improvements
Local Street Upgrades
Signal synchronization
Pedestrian and Bike Access Improvements
Traffic Management Systems
No Build

and then included all five Zones (Geotechnical/Technical Feasibility Study).

Throughout the NOP/NOI and all three series of SR710 Conversations, presentation included the federal court's review of the 1990s "Multi-Mode Low-Build" alternative which was judged not to have been adequately reviewed and appraised by CTs as part of the Federal jurisdiction.
The Scoping Report and EIR/EIS must specifically include updated Multi-Mode Alternatives even though not specifically listed by the NOP/NOI.

During the SR710 Conversations, Series 1, various "Considerations" included various additional Alternatives categories:

MultiMode Improved freeway ramp access from Foothill and LaTunaCanyon...
Freight on Rails - Improve Alameda Corridor and UP/BNSF thru SFValley to Palmdale
Fix Transit Gaps – Gold Line West Extension to Orange Line
and Rosemead/SR19 Gold Line North/South connector
Truck ban on I-210 due to road grades in excess of 2% - 710>134>I5

The Scoping Report, Alternatives Analyses, and EIR/EIS must include alternatives derived from the Series 1 Considerations.

The Scoping Report and EIR/EIS must include the following general categories of alternatives:

Tunnels with and without trucks
from SR710 South Stub to I-5, SR2, SR134, and I-210 and
from I-10 to I-210 east of Fremont Ave.
Based on MTA/PPP
Based on MTA/Parsons-Brinkerhoof Study and Geotechnical Study
Surface or Elevated Roadways with and without trucks
from SR710 South Stub to I-5, SR2, SR134, and I-210 and
from I-10 to I-210 east of Fremont Ave.
Surface and Elevated Highway Limited Connectors within the Study Area (1-2 miles)
MultiMode – Connector facilities and many other road improvements of existing facilities
MultiMode – Improvements of existing facilities without Connectors
BusRapidTransit – Road improvements focused entirely on improved bus movements
Multimodal transportation landscape of South Pasadena applied throughout the Study Area

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6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Subsurface Alternatives

Subsurface Alternatives herein do not include limited or extended "Cut-and-Cover" subsurface facilities as they are more similar to "subgrade" or "depressed section" surface freeways.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include a wide range of possible subsurface road facilities, beyond those considered under the earlier 2006 and January 2011 conceptual designs for the "Meridian" tunnel route (through the Zone 3). The Scoping Report, Alternatives Analyses, and EIR/EIS must include the Meridian Tunnel Alternatives of MTA/PPP of 2010-11 and the MTA/P-B of 2006, see figure below.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include the following subsurface, bored/mined tunnel systems for the following corridors:

1. *Far West – I-10/I-710 to south end of Mt Washington and thence to I-5 (Zone 1, southern alignment);*
2. *West – I-10/I-710 to mid west side of Mt Washington and thence to the I-5/SR2 interchange (Zone 1, northerly alignment);*
3. *West-Central – I-10/I-710 to north end of Mt Washington and thence to equivalent of Ave 38 and Eagle Rock Blvd. (north of intersection with Verdugo, southern alignment in Zone 2);*
4. *West-Central – I-10/I-710 to SR134 at San Rafael Interchange, west of I-210 (far west alignment in Zone 3, West-Garvanza)*
5. *Central – I-10/I-710 to north stub end of I-710/I-210 (St.Johns/Pasadena north of California, central alignment in Zone 3, beneath Alhambra City);*
6. *PPP Item 2 January 2011 Tunnel of 21,000 ft total project and thereby Alhambra Ave to California Blvd., X2 - x3 TBM Diam. Covers, WITHOUT connector bridges and viaducts*
7. *P-B 2006 Tunnel of 21,000 ft total project from thereby Alhambra Ave to California Blvd., X2 - x3 TBM Diam. Covers, WITH connector bridges and viaducts to the existing I-710 Stub at Valley Blvd.*
8. *East-Central – I-10/I-710 to north end of SR110 at Glenarm thence to I-210 easterly alignment in Zone 3)*
9. *West-Far East – I-10 to I-210 (Zone 3* Palm/Marengo SR110-Arroyo)
10. *Central-Far East – I-10 to I-210 (Zone 4/5* San Marino)
11. *East-Far East – I-10 to I-210 beneath Rosemead SR19 (Zone 5)*

As exampled in figure below for western two-thirds of Study Area:

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In all above subsurface alternatives, the Scoping Report, Alternatives Analyses, and EIR/EIS must include addition alternative subsets for the initial road alternative WITH and WITHOUT

Two-three times tunnel diameters for tunnel cover above the tunnel crown
Trucks and Truck Lanes and Truck Climbing Lanes
Ban Trucks of 3-4 axles and loads of 20,000 lbs gross – 3-4% Grades
Ban Trucks of 4-6 axles and loads of 40,000 lbs gross – 2% Grades
Tunnel covers of times two and times three
"Bus Rapid Transit" HOV lanes
South Portals entirely south of Valley Blvd.
*South Portals entirely south of I-10***
North Portals entirely north of California Blvd.
North Portals entirely north of I-210

***The EIR/EIS must include tunnel alternatives with portal beginning and ending south of I-10 and with tunnels beginning from the south side of I-10, leaving the existing south I-710 Stub with minor modifications for Hellman Ramp/Interchange and for Connector from Valley to West Mission Rd. in Alhambra.*

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Surface Alternatives – At Grade to +20ft above to -20ft below ground levels

Development of surface alternatives is based on the basic approach of "Let those who benefit provide the corridor and endure the solutions". As established at present and future, congestion on N-S arterials lies primarily within the city of Alhambra and thereby surface alternatives must lie within Alhambra on the south and Pasadena on north and may pass through San Marino and/or South Pasadena. No alternatives should be routed through adjacent communities without demonstrated and approved significant community benefits.

The Scoping Report Alternatives Analyses, and EIR/EIS must clearly include those surface alternatives which achieve the needs and purposes within those areas where congestion relief and other improvements are required or realized. Similarly alternatives must be excluded where those

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alternatives benefit communities beyond the project implementation areas while inflicting impacts on communities which do not realize benefits.

The Scoping Report Alternatives Analyses, and EIR/EIS must include the following N-S Full length (I-10 to I-210) surface alternatives:

West-Alhambra - Fremont /SR110 Corridor with interchanges at
- *Alhambra City - Mission Rd./Main*
- *South Pasadena - Huntington Drive or SR110*
- *Pasadena – California Blvd.*

Central-Mid Valley Corridor (New-San Marino-Ramona-Greenwood, 7mile Road w of I-605 and e of SR2) with interchanges at
- *East Pasadena*
- *East of Huntington Library*
- *San Gabriel /W.Rosemead*
- *Monterey Park (I-10)*
- *Montebello (SR60)*

Rosemead/SR19 – I-210-SR60 with interchanges at
- *I-10*
- *Mission Road*
- *Huntington Drive*

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Viaduct/Elevated Highway Alternatives (20-35ft height)

The Scoping Report, Alternatives Analyses, and EIR/EIS must include full length elevated alternatives along the same routes from I-10 to I-210:

West-Alhambra - Fremont /SR110 Corridor with interchanges at
- *Alhambra City - Mission Rd./Main*
- *South Pasadena - Huntington Drive or SR110*
- *Pasadena – California Blvd.*

Central-Mid Valley Corridor (New-San Marino-Ramona-Greenwood, 7mile Road W of I-605 and E of SR2) with interchanges at
- *East Pasadena*
- *East of Huntington Library*
- *San Gabriel /W.Rosemead*
- *Monterey Park (I-10)*

Rosemead/SR19 – I-210-SR60 with interchanges at
- *I-10*
- *Mission Road*
- *Huntington Drive*

Such elevated viaducts have been constructed in many California and other states, such as -
http://thei81challenge.org/cm/ResourceFiles/resources/Austin.pdf

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I-81, Austin http://www.texasfreeway.com/Austin/photos/183/183.shtml

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Viaduct/Elevated/Surface "Connector Roads" Alternatives

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an intermediate Build-Project Alternative including numerous highway connector elements between existing highway elements but not connecting the full N-S dimension of the Study Area; these must include as a minimum:

West- South End - Alhambra City
- *Mission Rd. and separately or combined-Mission-Meridian-Main/Huntington Drive*
- *Hellman-CSULA*
- *Hellman-Fremont (North and South of I-10)*
- *Valley-Palm/Mission-Palm/Main-Marengo/Alhambra Road*

West-North End – Pasadena
- *SR110-Arroyo-I-210*
- *SR110-SR710 North Stub*

Other prospective Connectors:

Central-Mid Valley Corridor
- *East Pasadena – I-210 to Huntington*
- *San Gabriel /W.Rosemead – I-10 to Mission*
- *Monterey Park – I-10 to Garvey*

Rosemead/SR19 –
- *I-210 to Huntingtont*
- *I-210 to Foothill/SierraMadre*
- *I-10 to Mission Road/LasTunas*

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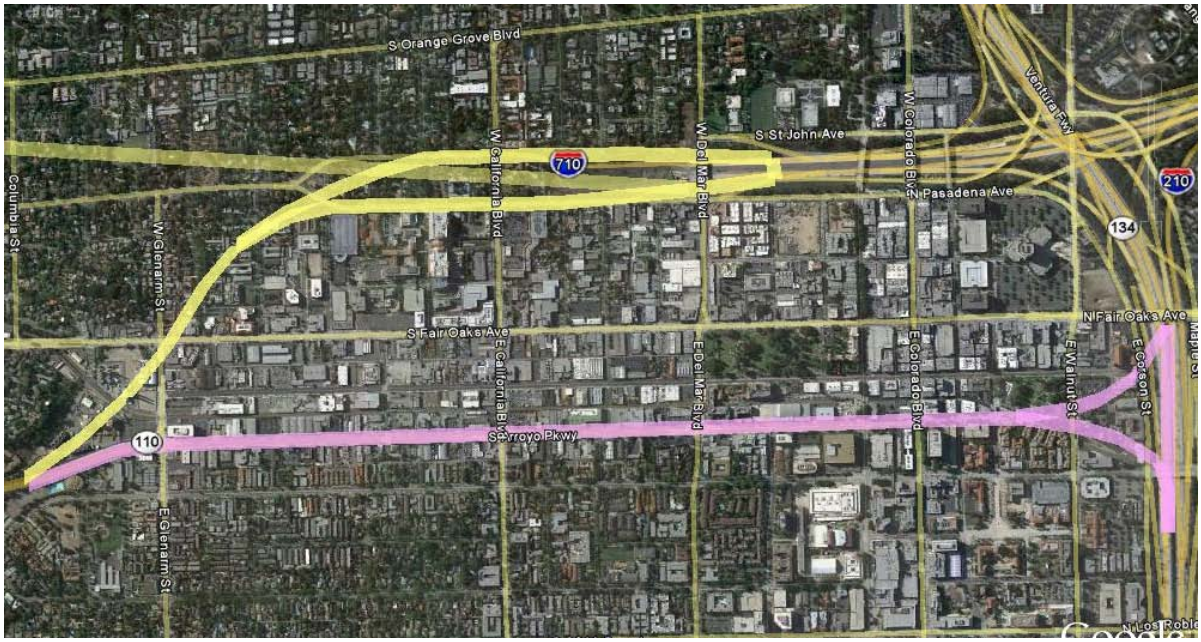
South Connectors

North Connectors



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6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Bus Rapid Transit Alternatives/Multi-Occupancy Only Alternative

The Scoping Report Alternatives Analyses, and EIR/EIS must include Bus Rapid Transit (BRT) systems for both N-S and E-W corridors.

In all above surface and elevated road alternatives, add a second alternative for the initial road alternative with a dedicated "Bus Rapid Transit" facility, and the BRTan additional alternative set for the following E-W corridors:

Marengo-City Terrace-Garvey
Main-Valley
Mission Road-Huntington Drive
Broadway-Figueroa-Monterey Road
Spring-San Fernando Road-Eagle Rock-Colorado

The BRT facility must include:

- *Upgrade curb lane – smooth surface, adjusted lane and curb curvature, driveway controls, overhead clearances for trees, wires, and signage*
- *Signal Synchronization and Transit Signal Over-Rides*
- *Out-of-Lane Stops and Stations*
  - *Integrated Multi-Road Transit Stations*
  - *Integrated Park-N-Ride Transit Stations*

As a separate road alternative or as enlargement part of any MultiMode Alternative, add an alternative including fully dedicated bus-lane/BRT Corridor facilities along:

- *San Fernando Road-Eagle Rock Blvd.-Colorado as two-way SW-NE facility*
- *Fremmont/Palm-Marengo as one-way couplets N/S facility*
- *Garfield/Atlantic as one-way couplets N/S facility*
- *Rosemead as two-way N/S facility*
- *Valley – Main/Mission to Peck Road*
- *Mission-Huntington Drive – Chavez to BuenaVista/Duarte*

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Multimode Alternatives (including Transportation System Management)

The Scoping Report Alternatives Analyses, and EIR/EIS must include the following Multi-Mode systems for the illustrate ten-plus E-W and N-S corridors, see figure below

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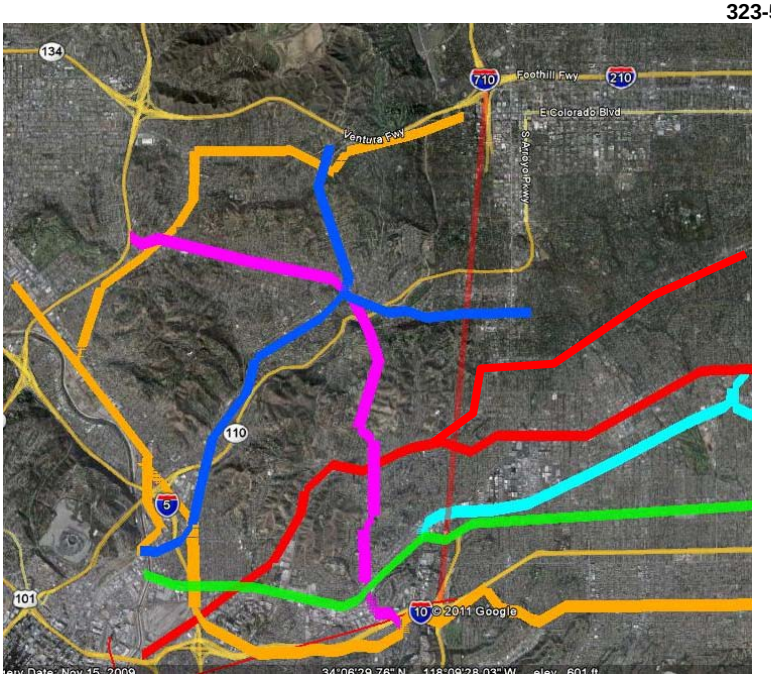

The Scoping Report, Alternatives Analyses, and EIR/EIS must include and develop a multimode approach consistent with those of MoveLA/FAST/Rand, South Pasadena, and others which usually involve several basic elements

Get Goods and Passengers on Rail
Get goods off the roads
Get passengers in multi-passenger road vehicles
Make streets, roads, freeway operate smarter – higher consistent flows
Increased passenger miles with fewer vehicles
Reduced peak-hour speeds but increased vehicle/hour and average daily trips
Price route and destination and origin parking to reflect true costs to the Public
Price fuel to reflect true environmental and infrastructure costs and impacts

MTA/CTs must include review of and assessment of application to LACounty in European urban plans to remove most light duty gas/diesel fueled individual-passenger vehicles from cities by 2035 and all individual-passenger vehicle by 2050.

The Scoping Report Alternatives Analyses, and EIR/EIS must include Important Components as well as many others:

Freight *"Zero Port Road Freight 2035"*
Gaps – BNSF/UPRR>LOSSAN > High Desert Corridor and SanLuisObispo
Passengers
Rail Transit Systems
NE-RedLine Extension through Glendale
GoldLine West Extension-Glendale/Burbank/N.Hollywood
GoldLine East Grid – Whittier/Azusa N-S CrossLink
Road Transit Systems
Make Streets Work Better
Road Efficiencies
Demand Management
Parking Management

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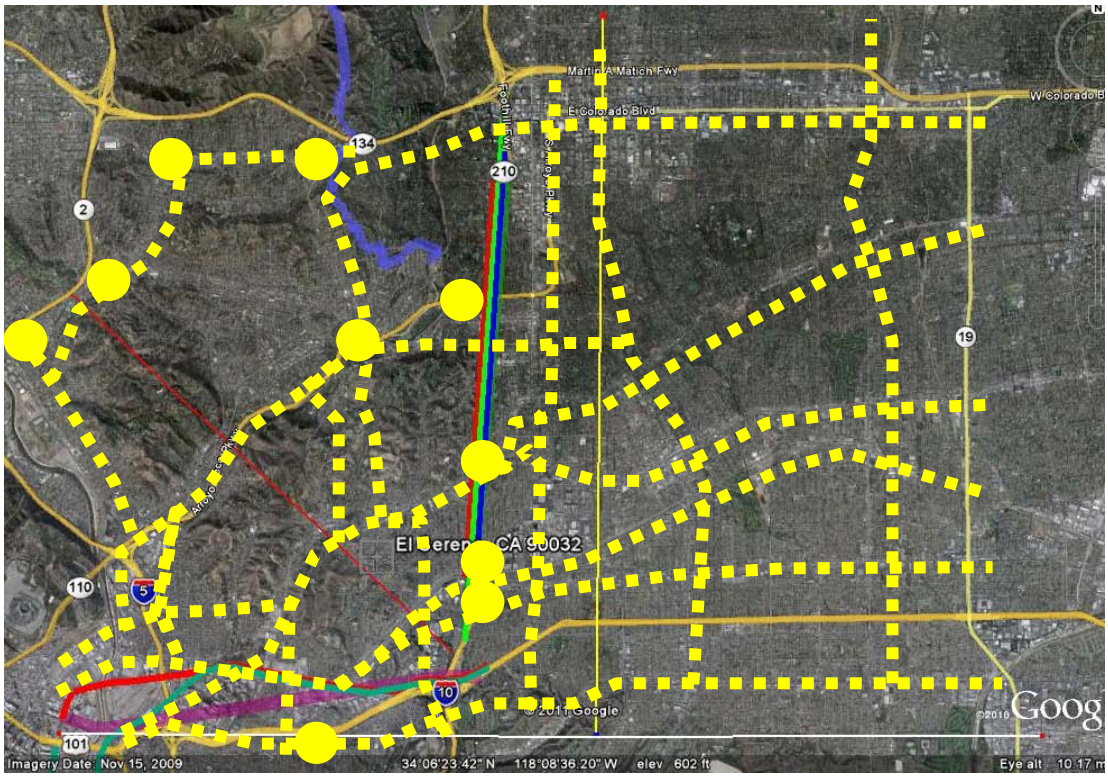
Free 1-3 hr retail parking
$25/car space-day – W of I-5, N of Slauson, E of Vermont, S of Los Feliz
Park-N-Ride – Parking Zone Perimeter of LA City as shown as example below:



Congestion Pricing for access to areas west of Par-N-Ride facilities
Similar to District Pricing (London, Singapore, HongKong, Dubai, etc.)
State/Local Registration – Full Cost Recovery for all vehicles in Study Area
LA County Fuel Taxes for a minimum of $5/gal – Gas and Diesel

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Funding Alternatives

As the CTs presentations of needs and purposes included references to financial and funding alternatives, including Public Private Partnerships, the Scoping Report, Alternative Analyses, and EIR/EIS must include all relevant financial and funding systems for any alternative with:

Costs – Total Costs
Estimated capital costs or values of more than $1 billion (50% >Measure R funds)
Estimated funding costs (interest, fees, etc.) by sources (e.g., private, federal, state, etc.)
Estimated management and design (CTs, MTA, and cities)
Estimated commissioning and startup
Estimated annual and life-of-project costs

Revenues – Total Revenues
Measure R Only
Measure R + Tolls
Measure R + Beneficiary Commuter Districts + Tolls

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Measure R + Beneficiary Commuter Districts + Containers/Ports Tonnage/Logistics + Tolls
Federal, State, Regional, and County grants and assistance
Other contributions

Financial Management
Federal, State, and CTs District
Regional-SCAG, County-MTA, and Cities
Special Assessment Districts
Project – Tolls, etc.

The Scoping Report, Alternative Analyses, and EIR/EIS must include various alternative contracting methods including:

Design/Build
Design/Build/Operate
Design/Finance/Build/Operate
Design/Finance/Build/Operate/Maintain
Design/Finance/Build/Operate/Maintain in Public Private Partnerships
Build/Operate/Transfer (BOT; Public provides only lands and some administrative activities)
Build/Own/Operate (BOO)

The Scoping Report, Alternative Analyses, and EIR/EIS must reflect and include considerations and LAO's concerns for Public-Private Partnerships as expressed in April 2011 by the State Legislative Analyst Office (http://www.lao.ca.gov/analysis/2010/transportation/trans_anl10.pdf) which can be summarized as follows:

Unidentified portion of the costs and allocations to Federal, State, regional, County, Cities, and any special assessment districts
State pays for operations and maintenance of transportation facilities from local funds
Project Costs not eligible for federal funding.
CTs not able to explain how it plans to spend funds requested
Legislature should not make such a large commitment of funds.
Unclear how P3 procurement would achieve certain cost savings
Assumed saving the state money over the life of the project.
Set-asides of a sizeable amount of the state's transportation funds to pay for P3 projects.
Reduced amounts of funding available for rest of state's highway maintenance/repairs
Budget Requests as a Blank Check - OPEN-ENDED authority to augment appropriation.
spend an unlimited amount of future federal funds
would be authorized INDEFINITELY

The Scoping Report, Alternative Analyses, and EIR/EIS must include:

Clear explanation how funds requested would be used, such as a list of activities
CTs plans to fund
Associated dollar amounts requested for these purposes
Identification of criteria/methodologies analyzing financial benefits from funding
use of payments would allow a project to be completed at a lower cost, or significantly sooner project completion and operation than otherwise be the case.
Explanation of impact by prioritizing maintenance of privately managed transportation facilities on governments' ability to fund operations, maintenance, and repair of the rest of the highway system operated in/by LA County
Identification of governmental/public costs paid under P3 agreements directly or indirectly
Identification of O&M costs for transportation facilities (not eligible for federal funds)
Full independently verified and audited explanation as to how CTs plans to spend the majority of the funds requested

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Support of assumed saving the state money over the life of the project
Impacts of reduced funds available for other highway maintenance and repair needs

The Scoping Report, Alternative Analyses, and EIR/EIS must include:
Workable Foundation agreements - given restrictions/requirements of funding sources
Financial plans on how funds requested would be used, such as a list of activities
Capital, Financials, Operations, and Maintenance
CTs plans to fund and associated dollar amounts requested for these purposes
Guarantee Maxima caps for all activities over $100M
Identifies quantitative assumptions, criteria, and methodologies used to establish state benefits from funding agreements.
Comparisons of Current Practices to demonstrate-
use of payments allow projects to be completed at a lower cost,
use of payments allow projects to be completed significantly sooner
Explanation of impacts of prioritizing maintenance of privately managed transportation facilities on the state's ability to fund maintenance and repair of the rest of the highway system operated by the state.

The Scoping Report, Alternative Analyses, and EIR/EIS must include comparisons of the financial aspects of each Alternative including costs assignments, revenue sources and their capabilities, indebtness costs, and potential for surplus revenue generation. Because of the unlimited range of all possible alternatives, the Scoping Report, Alternative Analyses, and EIR/EIS must include the widest possible ranges of financial resources, impacts, and mitigations.

The Scoping Report, Alternative Analyses, and EIR/EIS must include clarifications of the financial aspects of all CTs and MTA lands, their uses, and revenue/costs generation and their impacts on communities, municipal and County property taxes and other related indirect financial impacts and perhaps benefits.

The Scoping Report, Alternative Analyses, and EIR/EIS must include comparisons regarding the benefits derived from such large public expenditure through the support of local small-medium businesses and contractors and of construction trade employment. Alternative Analyses must include and compare Alternatives for:
Estimated direct support of local/LA County small to medium contractors
Estimated support of State medium to large contractors
Estimated support of international large contractors (generally under a State Contractor)
Estimated Non-California and International Contractors' shares of Contracts
Estimated shares of Contract values for heavy and specialized equipment and for materials vs labor components
Estimates must be appropriate to the stage of Alternative developments and may require engineering judgments and approximation based on recent – 2010-11 bidded contracts in the US and they should be applied in a conservative manner, no low-balling.

The Scoping Report, Alternative Analyses, and EIR/EIS must include comparisons regarding the use of existing contract administrative and inspection capabilities in cities and councils of governments rather than using CTs, MTA, or specialized consultants staffs.

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Screening of Alternatives

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The Scoping Report, Alternatives Analyses, and EIR/EIS must include quantitative criteria for assessing and comparing Alternatives during the Alternative Analyses and before commencing preparation of the EIR/EIS. MTA/CTs must also provide full transparent and accessible participation by the Public as the Public has not had actual Project context during the Scoping in order to recommend alternatives and mitigation and to present and evaluate significant impacts for the "Project" within a 100sq mi Study Area. Therefore the adequacy and completeness of the Scoping process is not fulfilled and appropriate for a multi-billion dollars project.

The Alternatives Analyses and Screening must include:

Project Purposes	*Define transportation problems to be solved in quantitative terms*
	Do not identify solutions, provides numerical criteria for success
	Promotes consideration of multiple modes and alternatives
Project Needs	*Establishes documented and quantified evidence that problems exist*
Project Goals	*Define broad vision statements influencing project characteristics*
Project Objectives	*Define quantified and scheduled steps to achieve the goals*

All screening must be based on pre-analyses established quantified criteria and ranking categories and their consistent application across the quantified information for each Alternative. Resorting numerical data and ranks after the comparisons must not be done and would demonstrate clearly bias and non-objective/arbitrary screening and process leading to the inadequacy of the EIR/EIS.

7. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Methods and Approaches

The Scoping Report, Alternatives Analyses, and EIR/EIS must include quantitative and numerical analyses based on monitoring and verified numerical computerized model results. Words such as "improve", "increase", "reduce", "diminish", "degrade", etc. must be supported by numerical values and quantification with supporting evidence; qualitative measures and descriptors must not be used or incorporated. Because of the use of computer models, all programs and input files must be made available preferably online or by CD/DVDs to the Public.

All computer models must be verifiable as to their organization, use of information, and calculations and must be audited/verified by a independent specialist in each field and computer sciences/programming.

Elise Kalfayan
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RECEIVED 4/14/11

April 12, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans – District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

Demands for inclusion in the 710 Gap Closure Project Environmental Impact Report/Environmental Impact Statement:

Proof and detailed analysis of working business models with detailed explanations of how they will avoid incurring later costs to taxpayers (with past successful models in California as examples) for all public/private partnership models being considered for this project.

Cost-Benefit Analysis of the project for state taxpayers only. Include costs of not using these funds for multi-mode alternatives, electric cargo rail system construction, doing nothing.

Cost-Benefit Analysis, encompassing public monies spent, pollution, future workforce training, and regional competitiveness for an electric rail system for carrying all port cargo to inland distribution centers versus conventional freeway expansion to handle truck traffic carrying cargo on the 710.

Cost-Benefit Analysis of disaster impacts, with detailed costs of addressing structural damage, fire, toxic spills, accidents, injuries, and extended cleanup due to a major 9.0 earthquake. Compare these costs with a detailed analysis of costs of addressing such threats to an alternative multi-modal system with no freeway tunnel.

Cost-Benefit Analysis of steel on steel vs. rubber on asphalt. Quantify comparative fuel use, noise level impacts, and pollution in the region under an electrified rail system for moving port goods or "more of the same" (investment in more freeways) with rubber on asphalt as continued major transport mechanism for individuals and port goods transit, instead of steel on steel.

Cost-Benefit Analysis of significant public investment in freeway expansion instead of new rail and cargo movement technology that address regional competitiveness with major port upgrades in Panama, Mexico, the Gulf of Mexico, and other regions.

Clear and detailed cost-benefit analysis (which examines in just as much detail every alternative such as electrified rail and expanded public transit investments) for the stated "need and purpose" of the final project.

Detailed analysis and estimated costs for each area of potential cost overrun in a tunnel project, including excavation and construction of portals, ventilation towers, engineering, geological troubles, accidents, materials, and earth movement.

Submitted by Elise Kalfayan Elise Kalfayan

Ron Kosinski
Deputy Director
Division of Environmental Planning
Caltrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

From:
Janice SooHoo
1339 El Vago St.
La Cañada Flintridge, CA 91011
jan@soohoos.org
818-952-4103
Submitted by email on 4/14/11 with hard copy submitted by surface mail

RE: Items to be included in the Scoping Report for the EIR/EIS for the extension of the 710 Freeway to the 210 Freeway.

Dear Mr. Kosinski,

As a resident of La Cañada Flintridge, and someone who has followed the proposed connection of the 710 Freeway to the 210 Freeway, I wish to submit these comments and demands for inclusion in the Scoping Report for the EIR/EIS for this project.

Stated Purpose and Need

The stated purpose and need for a connection of the 710 Freeway to the 210 Freeway has been consistent over the many decades since it was conceived. According to the Draft Environmental Impact Statements (EIS) and supplements from 1974 through 1986 (See 1, 2, 3, 4), the stated purpose for connecting the 710 and 210 Freeways is to improve the existing transportation system by reducing congestion on local city streets and to reduce stop and go driving, thereby reducing emissions and to reduce travel time through the corridor. The need for "closing the gap" was stated to be relief of traffic congestion caused by both trucks and automobiles in the Cities of Alhambra, Los Angeles, South Pasadena and Pasadena.and to facilitate goods movement through the 710 corridor.

The 1986 third draft EIS supplement reported 1982 average daily traffic counts on major arterials in the corridor between the 710 Freeway terminus and the 210 Freeway and along Valley Blvd. These data demonstrate that the studied roadways were near capacity, confirming the obvious – these roadways were, and still are, congested.

In 2011, some 37 years following the 1974 Draft EIS, the proposed purpose and need statement remains much the same: improving regional mobility and the movement of people, goods and services; reducing congestion on arterials and local streets and reducing greenhouse gas emissions from mobile sources.

On first read, these various purpose and need statements seem reasonable – add more lanes of freeway, and vehicles currently traveling on surface streets and major arterials will abandon those routes for the new roadways. But, is it true?

Reason dictates that if adding roadways relieves congestion, cities that invest heavily in building new roads, or expanding the capacity of existing ones, should benefit from less congestion, and lower costs associated with congestion, compared to cities that spend less on constructing additional capacity. In its 1998 report (See 5), the Surface Transportation Policy Project (STPP) sought to test this hypothesis by analyzing 15 years (1982 – 1996) of data from the Texas Transportation Institute's (TTI) study of congestion in 70 U.S. metropolitan areas from 35 states. These 70 metropolitan areas were first ranked based on their growth in lane capacity and then divided into half – a "high growth" group in which the metro areas increased lane capacity by an average of 47%, and a "low-growth" group in which average growth was only 22%.

Four conventional transportation indicators were calculated from the data: congestion cost per capita, excess fuel used per capita, delay per capita and roadway congestion index. The two groups showed **no significant difference** in congestion cost per capita, **no difference** in excess fuel per capita and delay per capita **did not differ** between the two groups.

The two groups showed **no significant difference** in the mean roadway congestion index, a commonly-used parameter calculated from an area's daily volume of travel per lane of freeways and major streets. The "high growth" group spent $22 billion more than the "low growth" group and the bottom line is **the "high growth" metropolitan areas did not achieve more congestion relief than the "low growth" areas** (See figure).

The STPP study did not control for factors such as changes in population, shifting demographics, economic activity or changes in land use. However, the large size of the data set (70 metropolitan areas), geographic range (35 states from every region of the U.S.) and the long study period (15 years) make it likely that the relationships that emerged from the analysis are real and not biased by any of these factors.

The results of the STPP analysis were not surprising in 1998, and are not surprising today. A large body of research documents the phenomenon of "induced traffic". When road capacity is expanded near congested routes, drivers who did not use that route previously are attracted to the new route to save time, resulting in an increase in the traffic volume in the new route. An analysis of 17 years of data from 30 urban California counties by U.C. Berkeley researchers (See 6) found that every 1% increase in new lane-miles generated a 0.9% increase in traffic in less than 5 years, effectively neutralizing the transient increase in capacity.

Glaringly absent from the statements of purpose and need and the draft Environmental Impact Statements is incontrovertible evidence that connecting the 710 Freeway to the 210 Freeway will achieve the stated purpose. Traffic counts alone cannot prove that adding more lanes – whether underground or above ground – will remove vehicles from the impacted streets. We do not know how many of the vehicles counted in such studies originated from the 710 Freeway terminus and eventually enter the 210 Freeway. Many may have destinations that lie between the current terminus of the 710 Freeway and the 210 Freeway. Their travel will not be facilitated by a tunnel spanning the distance between the current 710 Freeway terminus and the 210 Freeway with no opportunity for exit between these points. These vehicles must continue to rely on surface streets to reach their destinations.

Origin and Destination (O/D) Studies must be conducted to verify the need for the 710-210 connection. An O/D study answers questions about the major flows of traffic through an area or along a corridor. The study looks at where vehicles are coming from, where they are going, why people are traveling, when the trips occur, and what kinds of vehicles are traveling. Origin and destination travel information is critical to clearly understand the magnitude of the transportation

issues, assess the ability of the current transportation system to meet demands and identify projects and programs to address this demand.

O/D studies should be conducted over a wide geographic range, covering all possible zones, with the 710 terminus as the "origin". The sampling strategy needs to be comprehensive, providing data from different times of the day and night, during all days of the week and all times of the year. It needs to include not only passenger vehicles, but also tractor-trailers. The following information can be collected from each respondent who participates:

- Closest cross streets to the origin
- Closest cross streets to the destination
- Exact entrance ramp
- Exact exit ramp
- Trip purpose
- Frequency of trip making
- Trip length
- Vehicle occupancy
- Socio-demographic characteristics

Without O/D studies, the statement that connecting the 710 and 210 Freeways is necessary to relieve congestion is merely unsubstantiated conjecture.

Expansion of the Project Study Area

The study area as currently delineated is inadequate to accurately assess the environmental impacts of any project on the region. For example, the City of La Cañada Flintridge is not included in the current study area, nor is the 210 corridor between La Cañada Flintridge and the intersection of the 210 and 5 Freeways. If the 710 Freeway is extended to the 210 Freeway, this corridor will definitely be impacted. The City of La Cañada Flintridge has reviewed the Draft Final Report for the I-710 Missing Link Truck Study prepared by Iteris dated May 2009. Although Caltrans and Metro like to discredit any reference to this study on the grounds that it was "only a draft and never finalized", the citation of this report in Metro's PPP confers legitimacy to its use. Highlights of the La Cañada analysis of the 2009 Iteris "Missing Link Truck Study" are summarized below.

The Study confirms that in every comparison, the tunnel project would cause SIGNIFICANT detrimental traffic and truck impacts on the segment of the I-210 Freeway through the cities of La Cañada Flintridge, Glendale, Pasadena, and the community of La Crescenta. A comparison of 2030 values with and without the tunnel project concludes:

- More than 25% increase in daily volume on I-210
- Additional 30,000 vehicles per day on I-210
- Additional 2,500 trucks per day on I-210
- 850 additional trucks per PM PEAK HOUR on I-210
- Truck percentages on I-210 increase from 11% to over 20%
- Higher truck volumes on Foothill Boulevard (almost no current truck volumes)
- Before-no freeway segments through City over capacity, after-most northbound
- segments over capacity
- I-210 freeway segments through city will operate over capacity (Level-of-Service F)
- and consequently force traffic onto local streets
- Foothill Boulevard will operate over capacity near Angeles Crest Highway

Amazingly, the Study's summary findings conclude that the tunnel connection would make overall driving conditions worse. The number of vehicle miles traveled would INCREASE in the peak hour with an I-710 connection, which would bring a host of unintended environmental impacts. Even more astounding is that the number of vehicle hours would INCREASE as well, which translates to more hours of delay, gas consumption and air pollution. The system-wide benefit would be a small increase in overall average speed of 0.6 miles per hour. Regionally, the substandard traffic conditions that exist would not be improved if the tunnel was built and additionally, those substandard conditions would be introduced into areas that would otherwise, without the tunnel, have standard or better conditions.

The impact of a connection of the 710 and 210 Freeways on this corridor cannot be denied. It is reasonable to conclude that similar impacts can be expected for any alignment of a project and that the method of connection – tunnel or otherwise – is irrelevant to the negative outcome for affected communities. By Caltrans' and Metro's own admission, the transportation problems this project is purported to remedy are REGIONAL. The study area must be expanded to reflect the entire impacted region or the conclusions will be invalid.

Attending School in the 210 Freeway Pollution Corridor

Children are getting more than an education while in the classroom

A minimum of 30 schools are located within 1,000 feet of the 210 Freeway between the eastern border of La Cañada Flintridge and the intersection of the 210 and 5 Freeways. Over 10,000 students spend up to eight hours a day in the classrooms of these schools. Many of these same students spend several additional hours each day outdoors participating in Physical Education classes and/or sports practices.

Childhood asthma has long been linked to freeway pollution, but the damage doesn't stop with asthma. Pollution from auto and diesel emissions has also been linked to cancer, accelerated progression of atherosclerosis, impacts on fetal development and chronic inflammation of the central nervous system.

The children in this section of the 210 Freeway pollution corridor are already subjected to dangerous levels of traffic-related pollution. Currently, truck traffic makes up 11% of traffic on the 210 Freeway. An analysis of the SCAG so-called "Missing Link" Study done by the City of La Cañada Flintridge has shown that if the 710 Freeway is connected to the 210 Freeway, an additional 2,500 trucks per day will pass through this corridor – an increase of 25% -- and trucks will make up over 20% of the traffic on the 210 Freeway.

Below you will find a table listing thirty schools from this corridor that lie within 1,000 feet of the 210 Freeway. "Hot spot analysis" for these locations as well as all schools similarly related to all the routes under consideration for the proposed 710 tunnel project must be conducted. These listed locations should be designated as "sensitive receptor community sites." The hot spot analysis should seek **peak** values for all measurements so as not to underestimate the effect on human health. These studies must sample air quality at hourly intervals including PM 0.1, PM2.5, and PM10 throughout the twenty-four hours of given days to yield an accurate description of true exposure. In addition, seasonal studies are required to adequately assess the impact of seasonal climatologic conditions..

The Hot Spot analysis and modeling analysis should include harmful products e.g.,:

- Particulate matter PM to include all sized particles including ultrafine particles (<100nm) and nano particles (<50 nm), carbon black (organic carbon and elemental carbon), and degradation of

road products and tires and brake linings and diesel catalyst decay products (including, but not limited to, metal particulate emissions, strontium, and a variety of organic compounds)

- Nitrogen oxides (NOx) and nitrogen dioxide (NO_2)
- Ozone
- Carbon monoxide (CO)

Health Impact Assessments and Health Risk Assessments are necessary at all school sites meeting the same criterion of 1,000 feet proximity to the project in all zones under consideration.

In addition to schools named below, identical Hot Spot Analysis, Health Impact Assessments and Health Risk Assessments are necessary for:

Verdugo Hills Hospital
1812 Verdugo Blvd.
Glendale, CA 91208

Verdugo Hills Hospital is located at the intersection of the 210 and 2 Freeways. The patients and employees would be highly impacted by any project that results in additional traffic—and therefore exhaust -- on the 210 Freeway. The same Health Impact Assessments and Health Risk Assessments are necessary at all hospital and other health care facilities meeting the same criterion of 1,000 feet proximity to the project in all zones under consideration.

Schools Positioned within 1,000 feet of the 210 Freeway between La Cañada and the Intersection with the 5 Freeway

La Canada Elementary School	4540 Encinas Dr., La Cañada, CA 91011
La Canada High School	4463 Oak Grove Dr., La Cañada, CA 91011
Hillside School & Learning Center	4331 Oak Grove Dr., La Cañada, CA 9101
Flintridge Preparatory School	4543 Crown Ave., La Cañada, CA 91011
St. Francis High School	200 Foothill Blvd., La Cañada, CA 91011
St. Bede The Venerable	4524 Crown Ave., La Cañada, CA 91011
Learning Castle	4490 Cornishon Ave., La Cañada, CA 91011
La Canada Preparatory School	4490 Cornishon Ave., La Cañada, CA 91011
Crestview Preparatory School	140 Foothill Blvd., La Cañada, CA 91011
Pinewood Academy	4490 Cornishon Ave, La Cañada CA 91011
Renaissance Academy	4490 Cornishon Ave., La Cañada, CA 91011
Foothill Progressive Montessori	4526 Indianola Way, La Cañada, CA 91011
Hogg's Hollow Preschool	4490 Cornishon Ave., La Cañada, CA 91011
Child Educational Center	140 Foothill Blvd., La Cañada, CA 91011
Crescenta-Canada Coop Nursery School	1700 Foothill Blvd., La Cañada, CA 91011
La Canada Community Center Preschool	4469 Chevy Chase Dr., La Cañada, CA 91011
Flintridge Montessori	1739 Foothill Blvd., La Cañada, CA 91011
La Canada Preschool	4460 Oakwood Ave., La Cañada, CA 91011
St. George's Preschool	808 Foothill Blvd., La Cañada, CA 91011
Lighted Window Preschool	1200 Foothill Blvd., La Cañada, CA 91011
Parents & Childrens Nursery School	4603 Indianola Way, La Cañada, CA 91011
Foothills School	4490 Cornishon Ave., La Cañada, CA 91011
Crescenta Valley High School	2900 Community Ave., La Crescenta, CA 91214
Holy Redeemer Catholic School	2361 Del Mar Rd., Montrose, CA 91020
La Crescenta Elementary School	4343 La Crescenta Blvd., La Crescenta, CA 91214

La Crescenta Christian School	3013 Montrose Ave., La Crescenta, CA, 91214
Lincoln Avenue School	4310 New York Ave., La Crescenta, CA 91214
Delphi Academy	11341 Brainard Ave, Lake View Terrace, CA, 91342
Crescenta Valley Adventist School	6245 Honolulu Avenue, La Crescenta 91214
Crescenta Valley Christian Academy	9100 Tujunga Canyon, Tujunga, CA 91042

I look forward to reading the Scoping Report, when issued, and expect to see the issues raised by myself and others included. Ultimately, I hope that Caltrans and Metro will be convinced that there are better, fiscally and environmentally responsible methods to improve regional traffic and to move freight from the Ports of Los Angeles and Long Beach – methods that would result in a win-win outcome for all involved. If not, these agencies should brace themselves for continued battles with the citizens of the region who understand now, more than ever, the importance of protecting our communities from the fallout from bad planning.

Sincerely,
Janice SooHoo

1339 El Vago St.
La Cañada Flintridge, CA 91011
` April 13, 2011

Ron Kosinski
Deputy Director
Division of Environmental Planning
Caltrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

RE: SR-710 Environmental Impact Report/Scoping

Dear Mr. Kosinski:

As a resident of La Cañada Flintridge, a member of the No 710 Action Committee and someone who has followed the proposed connection of the 710 Freeway to the 210 Freeway, I wish to submit these comments and items for inclusion in the Scoping Report for the EIR/EIS on this project.

Stated Purpose and Need

Caltrans needs to prove that the project will fulfill the stated purpose and need.

The stated purpose and need for a connection of the 710 Freeway to the 210 Freeway has been consistent over the many decades since it was conceived. According to the Draft Environmental Impact Statements (EIS) and supplements from 1974 through 1986 (See 1, 2, 3, 4), the stated purpose for connecting the 710 and 210 Freeways is to improve the existing transportation system by reducing congestion on local city streets and to reduce stop and go driving, thereby reducing emissions and to reduce travel time through the corridor. The need for "closing the gap" was stated to be relief of traffic congestion caused by both trucks and automobiles in the Cities of Alhambra, Los Angeles, South Pasadena, and Pasadena. and to facilitate goods movement through the 710 corridor.

The 1986 third draft EIS supplement reported 1982 average daily traffic counts on major arterials in the corridor between the 710 Freeway terminus and the 210 Freeway and along Valley Blvd. These data demonstrate that the studied roadways were near capacity, confirming the obvious – these roadways were, and still are, congested.

In 2011, some 37 years following the 1974 Draft EIS, the proposed purpose and need statement remains much the same: improving regional mobility and the movement of people, goods and services; reducing congestion on arterials and local streets and reducing greenhouse gas emissions from mobile sources.

Reason dictates that if adding roadways relieves congestion, cities that invest heavily in building new roads, or expanding the capacity of existing ones, should benefit from less congestion, and lower costs associated with congestion, compared to cities that spend less on constructing additional capacity. In its 1998 report (See 5), the Surface Transportation Policy Project (STPP) sought to test this hypothesis by analyzing 15 years (1982 – 1996) of data from the Texas Transportation Institute's (TTI) study of congestion in 70 U.S. metropolitan areas from 35 states. These 70 metropolitan areas were first ranked based on their growth in lane capacity and then divided into half – a "high growth" group in which the metro areas increased lane capacity by an average of 47%, and a "low-growth" group in which average growth was only 22%.

Four conventional transportation indicators were calculated from the data: congestion cost per capita, excess fuel used per capita, delay per capita and roadway congestion index. The two groups showed no significant difference in congestion cost per capita, no difference in excess fuel per capita and delay per capita did not differ.

The two groups showed no significant difference in the mean roadway congestion index, a commonly-used parameter calculated from an area's daily volume of travel per lane of freeways and major streets. The “high growth” group spent $22 billion more than the “low growth” group and the bottom line is the “high growth” metropolitan areas did not achieve more congestion relief than the “low growth” areas (Figure 1).

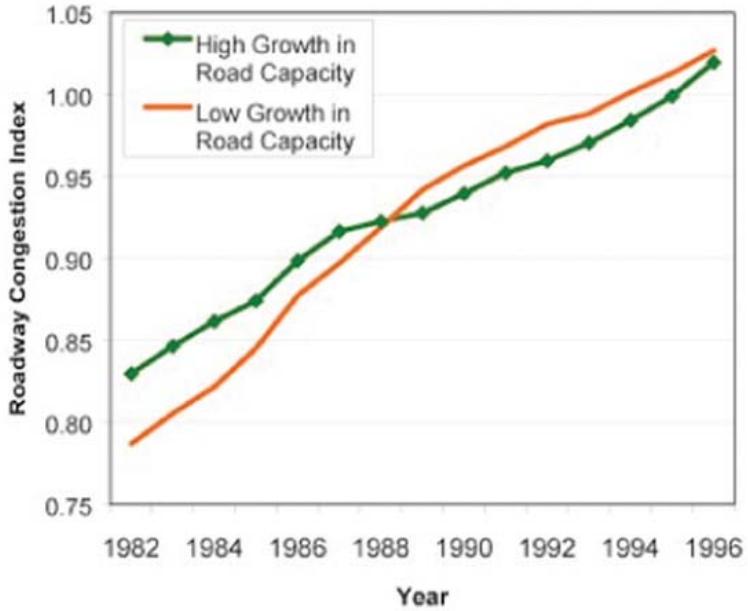

Figure 1.

The STPP study did not control for factors such as changes in population, shifting demographics, economic activity or changes in land use. However, the large size of the data set (70 metropolitan areas), geographic range (35 states from every region of the U.S.) and the long study period (15 years) make it likely that the relationships that emerged from the analysis are real and not biased by any of these factors.

There is substantial evidence that demonstrates that building new roads often increases congestion. When road capacity is expanded near congested routes, drivers who did not use that route previously are attracted to the new route to save time, resulting in an increase in the traffic volume in the new route. An analysis of 17 years of data from 30 urban California counties by U.C. Berkeley researchers (See 6) found that every 1% increase in new lane-miles generated a 0.9% increase in traffic in less than 5 years, effectively neutralizing the transient increase in capacity. A significant body of research demonstrates that new lanes fill with new traffic within a few years, particularly if surrounding routes are also congested (See 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25).

Glaringly absent from the current statements of purpose and need and the draft Environmental Impact Statements of the past is incontrovertible evidence that connecting the 710 Freeway to the 210 Freeway will achieve the stated purpose. Traffic counts alone cannot prove that adding more lanes – whether underground or above ground – will remove vehicles from the impacted streets. We do not know how many of the vehicles counted in such studies originated from the 710 Freeway terminus and eventually enter the 210 Freeway. Many may have destinations that lie between the current terminus of the 710 Freeway and the 210 Freeway. Their travel will not be facilitated by a tunnel spanning the distance between the current 710 Freeway terminus and the 210 Freeway with no opportunity for exit between these points. These vehicles must continue to rely on surface streets to reach their destinations.

In order for Caltrans to demonstrate that any project through any zone would fulfill the stated purpose and need, Origin and Destination (O/D) Studies must be conducted to verify the need for the 710-210 connection. An O/D study answers questions about the major flows of traffic through an area or along a corridor. The study looks at where vehicles are coming from, where they are going, why people are traveling, when the trips occur, and what kinds of vehicles are traveling. Origin and destination travel information is critical to clearly understand the magnitude of the transportation issues, assess the ability of the current transportation system to meet demands and identify projects and programs to address this demand.

O/D studies should be conducted over a wide geographic range, covering all possible zones, with the current 710 terminus as the "origin". The sampling strategy needs to be comprehensive, providing data from different times of the day and night, during all days of the week and all times of the year. It needs to include not only passenger vehicles, but also tractor-trailers. The following information can be collected from each respondent who participates:

- Closest cross streets to the origin
- Closest cross streets to the destination
- Exact entrance ramp
- Exact exit ramp
- Trip purpose
- Frequency of trip making
- Trip length
- Vehicle occupancy
- Socio-demographic characteristics

Without O/D studies, the statement that connecting the 710 and 210 Freeways is necessary to relieve congestion is merely conjecture.

Expansion of the Project Study Area

Caltrans claims to solve regional traffic issues with the proposed project, but the current study area is limited and does not include all potentially impacted communities.

The study area as currently delineated is inadequate to accurately assess the environmental impacts of any and all alternative projects on the region. The study area as currently defined appears to have been drawn from the map of the five zones under consideration for tunnel construction as presented to the public during the Tunnel Geotechnical Feasibility Study, casting doubt on the sincerity of Caltrans' claims to consider any and all alternatives to a tunnel project.

For example, the City of La Cañada Flintridge is not included in the current study area, nor is the 210 corridor between La Cañada Flintridge and the intersection of the 210 and 5 Freeways. If the 710 Freeway is extended to the 210 Freeway, this corridor will definitely feel the influence. The City of La Cañada Flintridge has reviewed the Draft Final Report for the I-710 Missing Link Truck Study prepared by Iteris dated May 2009. Although Caltrans and Metro like to discredit any reference to this study on the grounds that it was "only a draft and never finalized", the citation of this report in Metro's PPP confers legitimacy to its use. Highlights of the La Cañada analysis of the 2009 Iteris "Missing Link Truck Study" are summarized below.

The Study confirms that in every comparison, the tunnel project would cause SIGNIFICANT detrimental traffic and truck impacts on the segment of the I-210 Freeway through the cities of La Cañada Flintridge, Glendale, Pasadena, and the community of La Crescenta. A comparison of 2030 values with and without the tunnel project concludes:

- More than 25% increase in daily volume on I-210
- Additional 30,000 vehicles per day on I-210
- Additional 2,500 trucks per day on I-210
- 850 additional trucks per PM PEAK HOUR on I-210
- Truck percentages on I-210 increase from 11% to over 20%
- Higher truck volumes on Foothill Boulevard (almost no current truck volumes)
- Before-no freeway segments through City over capacity, after-most northbound
- segments over capacity
- I-210 freeway segments through city will operate over capacity (Level-of-Service F)
- and consequently force traffic onto local streets
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Amazingly, the Study's summary findings conclude that the tunnel connection would make overall driving conditions worse. The number of vehicle miles traveled would INCREASE in the peak hour with an I-710 connection, which would bring a host of unintended environmental impacts. Even more astounding is that the number of vehicle hours would INCREASE as well, which translates to more hours of delay, gas consumption and air pollution. The system-wide benefit would be a small increase in overall average speed of 0.6 miles per hour. Regionally, the substandard traffic conditions that exist would not be improved if the tunnel was built and additionally, those substandard conditions would be introduced into areas that would otherwise, without the tunnel, have standard or better conditions.

The negative impact of a connection of the 710 and 210 Freeways on this corridor cannot be denied. It is reasonable to conclude that similar impacts can be expected for any alignment of a project and that the method of connection – tunnel or otherwise – is irrelevant to the negative outcome for affected communities. By Caltrans' and Metro's own admission, the transportation problems this project is purported to remedy are REGIONAL. The study area must be expanded to reflect the entire impacted region or the conclusions will be invalid.

Diversion of Traffic to City and Residential Streets to Avoid Tolls

Building new roadways for freight transport does not guarantee truckers will use them.

Diversion of traffic from a toll road onto city or residential streets for purposes of toll avoidance is a great concern to all communities adjacent to any project built in the region. A growing number of reports show that tolled roadways can actually increase the traffic on adjacent arterials as drivers seek to avoid paying tolls (See 26, 27, 28, 29).

At THE Impact Project Trade, Health, Environment Conference in 2010, Australian Martin Wurt, Secretary of the Maribyrnong (Melbourne, Australia) Truck Action Group, reported on the increase in truck usage of residential streets since the construction of the Ring Roadway which was intended to funnel trucks to the Princes Freeway, over the Westgate Bridge, and then onto Bolte Bridge to the Port of Melbourne. However, this transportation plan has failed miserably since truck drivers are doing everything in their power to avoid the toll on Bolte Bridge. As a result, 20,000 heavy trucks a day currently use residential streets in Maribyrnong as thoroughfares. On some streets, as many as 8,000 heavy trucks a day pass homes, schools and hospitals. As a result, 36% of Maribyrnong's residents suffer from asthma. This is triple the Australian national average. Fifty-five percent of residents from affected streets reported ongoing sleep disturbance at night from truck traffic. Seventy-six percent felt constant apprehension at having to use the roads due to the truck traffic, and 62% reported that they no longer spent time in their yards due to exhaust fumes and noise.

States are increasing the use of toll roads with the intent of expanding capacity. A Government Accountability Office 2006 report estimated that 30 – 40% of new capacity is in the form of toll roadways (30, 31). Decreases in gas tax revenues and increased construction costs have led transportation agencies to resort to tolling for financing the cost of new construction. However, as discussed by Zhou *et. al.* (32), just because there is a need for alternative revenue resources , and thus an increase in construction of tolled roadways, it does not mean that these tolled roadways will be successful. A high percentage of new toll roads constructed have failed to attract the

traffic, and therefore the revenue, that they expected (33). The trucking industry has a low profit margin and is highly competitive, therefore many truckers are reluctant to use toll roads. As a result, truckers search for the minimum cost method and often avoid toll roads(34).

Caltrans must include in its EIR/EIS studies of toll tolerance/avoidance on the part of passenger vehicles as well as freight trucks. How much are passenger cars willing to pay? How many commuters would use the route and pay the toll twice a day? How much will trucking companies pay? At what toll level will these vehicles cease to use the supplied roadway and divert their trips through adjacent city and residential streets? What incentives will be effective in getting truckers to use a tolled roadway and keeping them on the tolled roadway? These questions must be studied and answered for all projects in all zones.

Attending School in the 210 Freeway Pollution Corridor

Children are getting more than an education while in the classroom.

A minimum of 30 schools are located within 1,000 feet of the 210 Freeway between the eastern border of La Cañada Flintridge and the intersection of the 210 and 5 Freeways (See Figures 2a and 2b). Over 10,000 students spend up to eight hours a day in the classrooms of these schools. Many of these same students spend several additional hours each day outdoors participating in Physical Education classes and/or sports practices.

Childhood asthma has long been linked to freeway pollution, but the damage doesn't stop with asthma. Pollution from auto and diesel emissions has also been linked to cancer, accelerated progression of atherosclerosis, impacts on fetal development and chronic inflammation of the central nervous system (Refer to the Health and Pollution submission from the No 710 Action Committee for a comprehensive list of documentation).

The children in this section of the 210 Freeway pollution corridor are already subjected to dangerous levels of traffic-related pollution. Currently, truck traffic makes up 11% of traffic on the 210 Freeway. An analysis of the SCAG so-called "Missing Link" Study done by the City of La Cañada Flintridge has shown that if the 710 Freeway is connected to the 210 Freeway, an additional 2,500 trucks per day will pass through this corridor – an increase of 25% -- and trucks will make up over 20% of the traffic on the 210 Freeway.

Below you will find a table listing thirty schools from this corridor that lie within 1,000 feet of the 210 Freeway. "Hot spot analysis" for these locations as well as all schools similarly related to all the routes under consideration for the proposed 710 tunnel project must be conducted. These listed locations should be designated as "sensitive receptor community sites." The hot spot analysis should seek peak values for all measurements so as not to underestimate the effect on human health. These studies must sample air quality at hourly intervals including PM 0.1, PM2.5, and PM10 throughout the twenty-four hours of given days to yield an accurate description of true exposure. In addition, seasonal studies are required to adequately assess the impact of seasonal climatologic conditions..

The Hot Spot analysis and modeling analysis should include harmful products e.g.,:

- Particulate matter PM to include all sized particles including ultrafine particles (<100nm) and nano particles (<50 nm), carbon black (organic carbon and elemental carbon), and degradation of road products and tires and brake linings and diesel catalyst decay products (including, but not limited to, metal particulate emissions, strontium, and a variety of organic compounds)
- Nitrogen oxides (NOx) and nitrogen dioxide (NO_2)
- Ozone
- Carbon monoxide (CO)

Health Impact Assessments and Health Risk Assessments are necessary at all school sites meeting the same criterion of 1,000 feet proximity to the project in all zones under consideration.

In addition to schools named below, identical Hot Spot Analysis, Health Impact Assessments and Health Risk Assessments are necessary for:

Verdugo Hills Hospital
1812 Verdugo Blvd.
Glendale, CA 91208

Verdugo Hills Hospital is located at the intersection of the 210 and 2 Freeways. The patients and employees would be adversely affected by any project that results in additional traffic—and therefore exhaust -- on the 210 Freeway**.** The same Health Impact Assessments and Health Risk Assessments are necessary at all hospital and other health care facilities meeting the same criterion of proximity to the project in all zones under consideration**.**

Schools Positioned within 1,000 feet of the 210 Freeway between La Cañada Flintridge and the Intersection with the 5 Freeway

La Canada Elementary School	4540 Encinas Dr., La Cañada, CA 91011
La Canada High School	4463 Oak Grove Dr., La Cañada, CA 91011
Hillside School & Learning Center	4331 Oak Grove Dr., La Cañada, CA 9101
Flintridge Preparatory School	4543 Crown Ave., La Cañada, CA 91011
St. Francis High School	200 Foothill Blvd., La Cañada, CA 91011
St. Bede The Venerable	4524 Crown Ave., La Cañada, CA 91011
Learning Castle	4490 Cornishon Ave., La Cañada, CA 91011
La Canada Preparatory School	4490 Cornishon Ave., La Cañada, CA 91011
Crestview Preparatory School	140 Foothill Blvd., La Cañada, CA 91011
Pinewood Academy	4490 Cornishon Ave, La Cañada CA 91011
Renaissance Academy	4490 Cornishon Ave., La Cañada, CA 91011
Foothill Progressive Montessori	4526 Indianola Way, La Cañada, CA 91011
Hogg's Hollow Preschool	4490 Cornishon Ave., La Cañada, CA 91011
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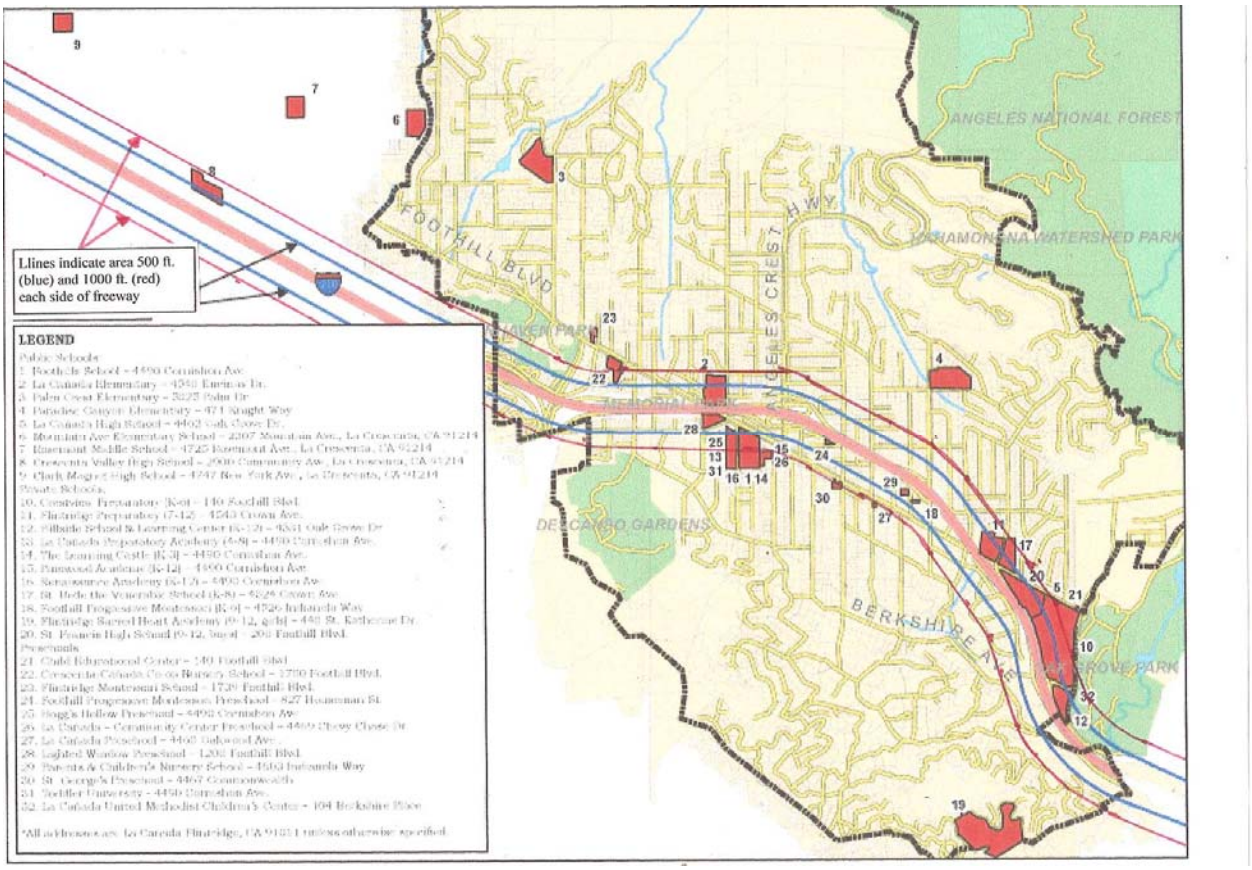

Figure 2a.

Schools in La Cañada Flintridge (Map courtesy of the City of La Cañada Flintridge).

Only those within 1,000 feet of the 210 Freeway (within the red lines paralleling the freeway) are included in the table above

.

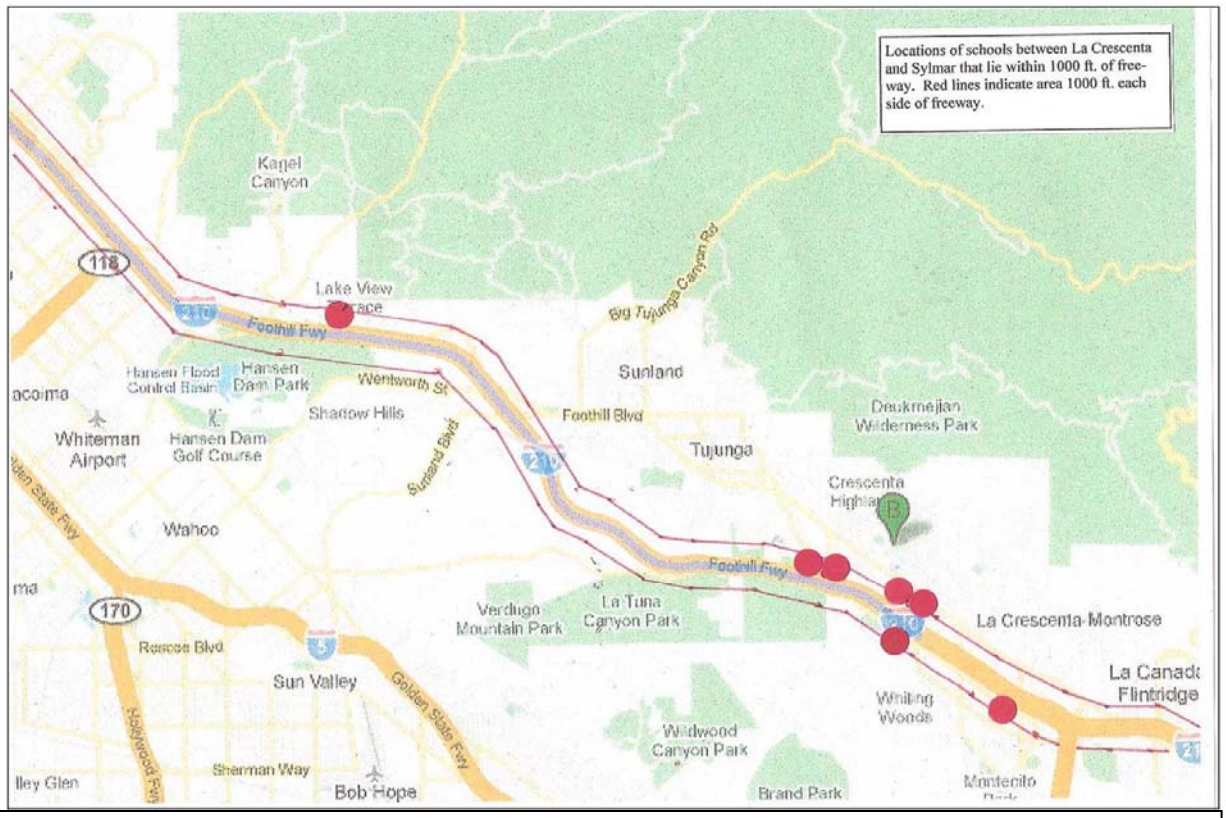

Figure 2b.
Schools between La Cañada Flintridge and the intersection of the 210 and 5 Freeways that lie within 1,000 feet of the 210 Freeway (within red lines paralleling the 201 Freeway).

I look forward to reading the Scoping Report, when issued, and expect to see the issues raised by myself and others included. Ultimately, I hope that Caltrans and Metro will be convinced that there are better, fiscally and environmentally responsible methods to improve regional automobile traffic and to move freight from the Ports of Los Angeles and Long Beach – methods that would result in a win-win outcome for all involved. If not, these agencies can expect continue opposition from the citizens of the region who understand now, more than ever, the importance of protecting our communities from the fallout from irresponsible planning.

Sincerely,

Janice SooHoo
Member, No 710 Action Committee

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From: **Joe Potts**
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received
4/14/11

To: **Ron Kosinski, Deputy District Director**
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

DEMANDS FOR INCLUSION IN THE ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Kosinski,

RE: SR-710 Environmental Impact Report/ Scoping Request. I would like to state at the outset my firm belief that MTA and Caltrans should be completely removed from any and all planning and discussion of the SR 710 extension as the public can no longer trust them to act fairly and responsibly on their behalf in this matter. Over the course of its 70+ year history this project has been ill conceived and mismanaged. The agencies involved through their evolution have been constantly engaged in corruption, bullying, conflict of interest, secrecy, waste of public funds and misrepresentation. This project and indeed the totality of Southern California's transportation projects should be turned over to an agency with a proven track record in utilizing any and "all" means of transportation to solve traffic congestion and move people and goods through the region in a safe and efficient manner.

I attended a March 3rd meeting in Alhambra to hear about the environmental impact review process. The mood there seemed more serious as well. After the briefing, which provided basic information about scoping for the CEQA/NEPA process for 'the project,' a series of attendees asked a variation on the same question: **What is the project?**

CalTrans and Metro presumably want to and (plan to) drill tunnels between the northern end of the 710 freeway and the 210 freeway. But they haven't told participants in their 710 conversation process that they want to and (plan to) do this, and would we please provide input on what environmental impacts to study and what alternatives to consider?

What they have now officially announced, halfway through the Conversation meeting series, is that:

"The proposed project, depending on the results of a thorough environmental analysis of all possible transportation improvements, may include, but not be limited to: surface and subsurface highway/freeway construction, heavy rail and bus/ light rail systems, local street upgrades, traffic management systems and a no build alternative. There currently is a gap in the I-710 corridor, for a distance of approximately 4.5 miles (7.2 km) which

extends between Valley Boulevard to the south and Del Mar to the north. As originally identified in the April 13, 1998 Record of Decision for the Meridian Variation alignment, this gap contributes to congestion on local streets and regional freeway system. The objective of this project is to relieve congestion and improve mobility within the project area."

It still doesn't define the project. The recent notice of intent for environmental review of another Measure R project, the Gold Line Foothill Extension, wasn't coy in stating that "The proposed project is an extension of the existing Metro Gold Line light rail transit line, from Azusa to Montclair."

There's an almost postmodern feel to the SR-710 process. The name "710 Gap Closure Project" features the lacuna rather than a mega-project to fill it. (Streestblog has even countered with alternative names http://la.streetsblog.org/2011/02/25/name-the-sr-710-extension-moves-to-the-final-page-but-how-much-will-it-cost) Over decades, the proposed freeway has retreated into trenches and now into deeply bored tunnels. Public outreach around these tunnels doesn't mention tunnels. It seems more like something from Deleuze and Guattari than CalTrans. What happened to the confident modernism of the freeway-paving 20th century?

The undefined nature of the project left skeptics and supporters at last Thursday's meeting unsatisfied. A Northeast LA resident wondered why no outreach meetings were being held in Mt. Washington or Glassell Park, site of two of the five possible tunnel orientations. An elderly Alhambra resident described her frustration over writing letters for 35 years in support of a freeway extension: "Why can't we start digging yet."

You can't dig a project that doesn't exist yet.

In late 2002, Caltrans, in consultation with the FHWA, determined that consideration of a tunnel was appropriate as an alternative to a surface extension along the 710 corridor. Over the next year, representatives from Caltrans, the Southern California Association of Governments ("SCAG") and the Los Angeles County Metropolitan Transportation Authority ("MTA") met publicly with various city councils along the corridor to present this alternative concept and to recommend further study of a tunnel alternative. In June of 2003, the South Pasadena City Council voted not to oppose "sound research" of a tunnel alternative. However, this was not to be misconstrued as support for the tunnel. The ultimate position of the South Pasadena City Council will depend on the integrity of the research.

In 2004 the MTA selected a team of outside consultants, led by the engineering firm Parsons, Brinkerhoff, Quade & Douglas (PB), to conduct a feasibility analysis of the tunnel approach. The limited purpose of the analysis was to: a) determine if a tunnel is technically, operationally, and financially feasible; b) describe the preliminary potential physical, environmental, financial, and social impacts to neighboring communities; c) validate the concept of a deep-bore tunnel; and d) develop a more refined project scope

and cost. After several months of delay, the MTA's Route 710 Tunnel Technical Feasibility Assessment Report (the "MTA Study") was finally issued in June of 2006.

In response to the MTA Study, and in an effort to dedicate ample time and analysis to its review, the Mayor and City Council appointed seven South Pasadena residents to a Special Advisory Committee on the subject. Their report agreed that the MTA Study showed that a tunnel was technically feasible, but went on to say that the MTA Study did not provide sufficient information upon which to responsibly determine its environmental and financial feasibility, and that more study was needed.

In March of 2007, Metro and Caltrans initiated plans for another, more extensive Feasibility Study that also received federal funding through the efforts of Congressman Adam Schiff, with the stipulation that the Study consider all practicable routes. On November 28, 2007, the City Council approved an updated Resolution adding "route-neutral" to the description of the "sound research" the City would not oppose regarding a bored tunnel alternative. Caltrans and Metro initiated the SR-710 Tunnel Geotechnical Study process in July, 2008, and the City is participating with representatives on the Steering Committee and the Technical Advisory Committee.

In late 2007, SCAG issued its Draft 2008 Regional Transportation Plan (RTP). SCAG removed the 710 surface route from the plan, but included the completion of the 710 Tunnel in the "funded project" part of the RTP, rather than the "strategic project" (i.e., unfunded) part of the RTP. In its official comments to SCAG, the City requested that they move the 710 Tunnel into the "strategic project" part of the plan, since funding is not committed, available, nor reasonably available in the near future.

On June 8, 2008, City staff along with representatives from the cities of Pasadena and La Canada-Flintridge and Assemblymember Portantino's office appeared at SCAG's Transportation and Communications Committee meeting to request that they move the 710 tunnel into the "Strategic Project" portion of the RTP. The Committee voted not to do so, and the Regional Council approved the RTP as it was later that same day.

On March 12, 2008, Metro issued its Draft 2008 Long-range Transportation Plan (LRTP) for Los Angeles County. Metro also included what they termed the 710 "Gap Closure" Project in its Plan, but only as a potential, unfunded project. In its official comments to SCAG, the City supported the placement of the SR-710 tunnel in the "strategic unfunded" part of the plan. At their meeting on June 26, 2008, the Metro Board deferred approval of the LRTP until their November meeting to see if a bill (AB2321) to place a half-cent LA County sales tax measure (Measure R) on the November ballot to fund transportation projects would be passed and signed into law.

At their July meeting, the Metro Board approved an ordinance for the proposed sales tax measure that incorporated an Expenditure Plan that included $780 million in funding for the SR-710 tunnel. The City objected to that funding since the SR-710 tunnel did not fit any of the categories Metro cited for an exemption to the California Environmental

Quality Act (CEQA). Metro did not remove the SR-710 tunnel from the Expenditure Plan as the City requested, so the City filed a CEQA lawsuit against Metro on August 27.

The Governor signed AB2321 on September 25, 2008, so "Measure R" was placed on the November 4th ballot. On October 15, the City Council of South Pasadena passed a resolution opposing "Measure R", as did several other San Gabriel Valley cities and the San Gabriel Valley Council of Governments. The voters approved "Measure R" by a slim margin.

So apparently the goal now is to spend $780,000,000 by any means necessary, while attempting to keep the taxpayers in the dark.

The term "smog" was coined in 1905 by H.A. Des Vex. It is a combination of the words "smoke" and "fog".

Smog is produced from pollution from vehicles. It is made up of gas from slightly above Earth's surface, part of the ozone, particular matter and exhaust. Particular matter is made from "small solid and liquid particles" (cbc.ca). Pollutants in the air can be more harmful to floral than they are to humans. Trees can most definitely be killed by smog and whole ecosystems are damaged. In Los Angeles more than 50% of tree deaths seem to be a direct result of smog and its effects. Air pollution has been found to be the indirect cause of death to some birds. The emitted oxides of sculpture and the heavy metals copper, zinc, nickel and lead effects their internal organs, making it more difficult for them to breed. Researchers have also found that more polluted areas have fewer caterpillars, which in turn limits their food intake. This decreases the health in birds and compromises their ability to reproduce, which can possibly lead to their decrease in population.

Smog is air pollution. It is harmful chemicals that are floating around in the air. This can make animals very sick. It can also have indirect effects on the animals. For example, if the smog is very thick little sunlight can get through. This stunts the growth of plants or even kills them. If an animal depends on these plants as food, they may find it harder and harder to fill their stomachs. They may eventually die from this indirect effect. A new study has found that elevated ozone found in lower layers of the atmosphere could be another contributing factor to the ongoing decline and disappearance of many populations of amphibians. The study is published in the latest issue of *Environmental Toxicology and Chemistry.* Declines of many amphibian populations over the past two decades have received significant attention from biologists, in part because amphibians are viewed as monitors or sentinels of pollution and other anthropogenic changes to the environment. Their importance as potential indicators of environmental health is well recognized for watersheds but is more problematic for air quality.

Ozone (O_3) is a common air pollutant in many urban settings. Consequently, in adjacent wildlife habitats, O_3 levels can frequently exceed federally recommended levels. It is a highly reactive gas that can be elevated at ground levels by a chemical reaction between oxides of nitrogen and volatile organic compounds in the presence of sunlight. In studying the feeding and escape/exploratory behavior of toads after acute and chronic exposure to O_3, the researchers concluded that O_3 affects many aspects of toad behavior and physiology in a manner consistent with the extensive literature on humans and other mammals. The study results indicate that exposure to oxidant air pollution might be a contributing factor to declines in amphibian populations.

A toxic cocktail of ultra fine particles is lurking inside road tunnels in concentration levels so high they have the potential to harm drivers and passengers, a new study has found. "The human health effects of exposure to ultra fine particles produced by fuel combustion are generally regarded as detrimental," Professor Mohawks said." Effects can range from minor respiratory problems in healthy people, to acute myocardial infarction (heart attack) in people with existing heart complaints.

"What this study aimed to do was identify the concentration levels found in the tunnel. It generated a huge body of data on the concentrations and the results show that, at times, the levels are up to 1000 times higher than in urban ambient conditions," she said. She said drivers and occupants of new vehicles which had their windows closed were safer than people traveling in older vehicles.

"People who are driving older vehicles which are inferior in terms of tightness and also those riding motorcycles or driving convertibles, these people are exposed to incredibly high concentrations," she said." When compared with similar studies reported previously, the measurements here were among the highest recorded concentrations," she said.

Professor Mohawks said tunnels were becoming an increasingly necessary infrastructure component in many cities across the world.

"When governments are building tunnels for urban design reasons, they should also consider the impact these tunnels are having on the environment and to people's health," she said.

"The study highlights why governments need to consider how they are going to deal with the air pollution levels inside the tunnel and removal of ultra fine particles in the outside environment."

The rapid development of road tunnels has given rise to considerable debate about their Health effects, the need for ventilation stacks, their location and the necessity of filtration to remove the concentrated vehicle emissions from both inside the tunnel and from the stack emissions. This debate is separate from and different to wider planning and transport issues, and especially the merits of public transport over freeways, and the effects of freeways on traffic and communities.

As these levels are above the range of exposures and concentrations known to trigger delayed asthmatic attacks in sensitive individuals, it is suggested that these people, and drivers in open vehicles and motorcyclists should avoid using tunnels and that motorists should close car windows before entering the tunnels. In addition it has been suggested that motorists should be warned by means of signs. In-tunnel air quality studies have failed to examine the impact of repeated trips through tunnels and of the interaction of different pollutants, especially that of NO2 and PM2.5. This is a
Major deficiency. Other potentially harmful components of in-tunnel air include volatile organic compounds (VOC), of which benzene is probably the major contributor of risk, and poly-aromatic hydrocarbons (PAH). In the tunnel atmosphere many of these volatile components are captured on the surface of carbon particles (PM2.5), increasing the toxicity.

Exposure to fine particles, especially the ultra fine particles below PM2.5, results in adverse short term effects such as cough, phlegm, mild to severe irritation of eyes and upper airways and exacerbation of asthma, and long term effects such as cancer, heart disease and premature deaths. Increased levels of particulate pollution are directly related to increases in hospital admissions, region wide. There is no safe threshold for exposure to particles, especially those associated with diesel engine exhaust.

Another major component of vehicle exhaust and tunnel air is nitrogen dioxide. It is a strong irritant causing eye and lung irritation and the onset of asthma.
Research has identified a significant impact on sensitive (healthy allergic asthmatic) individuals exposed to tunnel air. Experimental subjects were exposed to common tunnel pollutants as follows:

- NO2 levels of 500μg/m3 for half an hour
- NO2 levels of 500μg/m3 for three 15 minute periods over 2 days

In a road tunnel to NO2 levels of 300 μg/m3 together with PM2.5 levels of 100μg/m3. (It is not technically feasible to expose people to PM2.5 in the absence of other pollutants, but nitrogen dioxide is available as a pure gas, able to be used in an exposure chamber).In each case there was a similar increase in sensitivity to allergen which occurred some time after the actual exposure. The response to NO2 is not surprising, considering the known irritant effect of the gas however there are two other conclusions of significance:

- Short exposure times act cumulatively over periods likely to be experienced by commuters.
- Nitrogen dioxide and fine particles (PM2.5) act additively.

Based on these observations, it is clear that the levels currently existing in tunnels are higher than is desirable or safe.

It is frequently suggested that these problems were not experienced in older road tunnels. The reason for this is both simple and very complex and relates both to changes in vehicle emissions and tunnel ventilation technology. Until recently, the volumes of air required for tunnel were determined entirely by the need to dilute carbon monoxide to

safe levels. The other pollutant of major concern was lead from compounds used to increase the octane rating of gasoline. Until recently, experience had generally shown that if carbon monoxide was successfully controlled, other pollutants would be kept to safe or at least acceptable levels. Over the last 20 years there has been a significant change in vehicle emissions due to the introduction of unleaded petrol and catalytic converters:

- Lead levels have been reduced to negligible levels
- Carbon monoxide levels have been reduced by about 85% in light petrol engines.
- Sculpture dioxide levels have dropped due to the use of low sculpture fuels
- Nitrogen dioxide levels have tended to increase due to the introduction of more efficient Engines.

Requirements for the reduction of PM10 emissions from diesel engines have led to a Progressive reduction in particulate matter however this has had an unforeseen adverse impact on the harm caused by particulate emissions. Although PM10 levels have been reduced by up to 60% (by weight), the number of fine and ultra fine particles has significantly increased, thus making diesel exhaust more harmful than it previously was because it can now penetrate more deeply into the lungs. A very large proportion of particles in tunnel air are less than 1 micron in diameter. Diesel exhaust is now known to be a cause of lung and other cancer.

The guidelines put out by the international road tunneling association clearly state That as a result of these changes carbon monoxide is no longer a suitable 'marker' for tunnel air quality. As a proportion of tunnel air related to carbon monoxide, the harmful components nitrogen dioxide and PM2.5 have increased by a factor of at least 3.

Technology to remove fine particles is now highly developed with manufacturers having achieved efficiencies of removal of fine particles of between 80 and 95% with air Flow velocities in excess of 10m/s but this has not been proven in actual installations. A number of manufacturers also offer nitrogen dioxide removal systems but only one, has been actually installed in a tunnel.

The NO2 removal systems are also claimed to remove a significant proportion of volatile organic

Compounds. All NO2 removal systems require the installation of electrostatic precipitator filtration equipment to remove particles form the air before it enters the gas removal system the main problem comes from the fact that it not feasible to increase air Flows within the tunnel to increase dilution of the pollutants as this would lead to dangerously high air flow speeds at the centre of the tunnel. Emission of pollutants from the portals is prohibited by except during emergencies.

.Road tunnels can be designed which do not need stacks, tunnels up are often Ventilated through their portals at ground level. Except in unusual circumstances, large tunnels constructed in existing urban areas will require some sort of structure to disperse exhaust gases since there is no technology currently available to remove carbon monoxide. The size and nature of these dispersal structures is determined almost entirely by particulate matter. An impact of 5 - 10μg/m3 of PM10 for 1 hour from a tunnel would be

Unacceptable, however this represents a 200 fold dilution of the stack emissions. Such impacts are predicted to occur around the M5E stack. A similar dilution of carbon

monoxide, even if present in the stack exhaust at the maximum allowable concentration of 87ppm would represent a ground level concentration of 0.4ppm, negligible in impact when compared to the recommended 1 hour WHO exposure level of 25ppm. The structures required for the dispersal of the carbon monoxide alone contained in the tunnel exhaust can be much simpler and smaller than those required for particulate matter and nitrogen dioxide. They would be closer in size to those used to ventilate city car parks and their actual size is more likely to be determined by the need to safely disperse fumes in the case of fire than by any other consideration.

Environmental health researchers from UCLA, the University of Southern California and the California Air Resources Board have found that during the hours before sunrise, freeway air pollution extends much further than previously thought.

Air pollutants from Interstate 10 in Santa Monica extend as far as 2,500 meters — more than 1.5 miles — downwind, based on recent measurements from a research team headed by Dr. Arthur Winner, a professor of environmental health sciences at the UCLA School of Public Health. This distance is 10 times greater than previously measured daytime pollutant impacts from roadways and has significant exposure implications, since most people are in their homes during the hours before sunrise and outdoor pollutants penetrate into indoor environments.

A second striking finding of the study was that although traffic volumes are lower in the pre-sunrise hours, the air pollution concentrations measured by the team were higher than even those during daytime traffic congestion peaks. Concentrations are higher before sunrise even though emissions are lower because of the unique weather conditions. In the pre-sunrise hours, wind speeds are generally very low, and while the wind direction is somewhat variable, the predominant direction is from the northeast in the winter months and the northwest in the summer months.

This means that areas south of Interstate 10 are generally downwind in the pre-sunrise hours and areas north of the freeway are generally upwind; this is consistent with the observation that vehicle-related pollutants are found much further from the freeway on the south side in the pre-sunrise hours, compared with the north side.

"Our research shows that under the low wind speeds and shallow temperature inversions during the early morning, before sunrise, air pollution from freeways is trapped near the surface, limiting dilution and creating a zone of influence many times greater than during the day," said Dr. Suzanne Paulson, a professor in the UCLA Department of Atmospheric and Oceanic Sciences and a co-principal investigator of the study. "These meteorological conditions are very common in the hours before sunrise." In comparing the winter and summer early mornings, researchers found much higher levels of air pollution in the winter." This is because the sun rises later in the winter, so the early morning period captures more of the early morning rush hour," Paulsen said." Our findings confirm previous work showing peak levels of ultra fine particles (UFP) immediately adjacent to the freeway, but we found high concentrations persisted for up to 1.5 miles downwind of the freeway during the pre-sunrise hours," said Dr. Scott Fruit of the USC Keck School of

Medicine. "Elevated UFP concentrations also extended up to 600 meters upwind of the freeway, another strong difference from daytime observations, which typically show little or no vehicle-related pollution directly upwind from freeways."

In the present study, other pollutants, including nitric oxide and particle-bound polycyclic aromatic hydrocarbons, also extended far from the freeway during the pre-sunrise hours. Other members of the research team included Dr. Kathleen Konawa and Steve Mara of the California Air Resources Board, which sponsored the study.

"The study raises more questions about the significant health outcomes caused or exacerbated by freeway traffic," Winner said. Numerous epidemiologic studies have already shown that traffic-related pollution is linked to increased risk of asthma, respiratory illness, cardiovascular disease and premature mortality. The researchers recommend that residents living near freeways should consider keeping their windows closed at night and minimize outdoor exercise near major roadways in the hours before sunrise.The ozone molecule consists of three oxygen atoms that are bound together (diatomic oxygen, or O3). Unlike the form of oxygen that is a major constituent of air (diatomic oxygen, or O2); ozone is a powerful oxidizing agent. Ozone reacts with some gases, such as nitric oxide or NO, and with some surfaces, such as dust particles, leaves, and biological membranes. These reactions can damage living cells, such as those present in the linings of the human lungs. Exposure has been associated with several adverse health effects, such as aggravation of asthma and decreased lung function.

Ozone was first observed in the Los Angeles area in the 1940s. The ozone that the ARB regulates as an air pollutant is mainly produced close to ground (troposphere ozone), where people live, exercise, and breathe. A layer of ozone high up in the atmosphere, called stratospheric ozone, reduces the amount of ultraviolet light entering the earth's atmosphere. Without the protection of the stratospheric ozone layer, plant and animal life would be seriously harmed. In this document, 'ozone' refers to troposphere ozone unless otherwise specified.

Most of the ozone in California's air results from reactions between substances emitted from vehicles, industrial plants, consumer products, and vegetation. These reactions involve volatile organic compounds (Voss, which the ARB also refers to as reactive organic gases or ROG) and oxides of nitrogen (Knox) in the presence of sunlight. As a photochemical pollutant, ozone is formed only during daylight hours under appropriate conditions, but is destroyed throughout the day and night. Therefore, ozone concentrations vary depending upon both the time of day and the location. Ozone concentrations are higher on hot, sunny, calm days. In metropolitan areas of California, ozone concentrations frequently exceed regulatory standards during the summer.

From the 1950s into the 1970s, California had the highest ozone concentrations in the world, with hourly average concentrations in Los Angeles peaking over 0.5 pip and frequent "smog alerts". In the early 1970s, the ARB initiated emission control strategies that provided for concurrent and continuing reductions of both Knox and VOC from mobile sources and, in conjunction with the local air districts, stationary and area sources.

nitrogen cycle is neither to generate nor destroy ozone molecules. Therefore, for ozone to accumulate according to the photo stationary-state equation, an additional pathway is needed to convert NO to NO2; one that will not destroy ozone. The photochemical oxidation of Voss, such as hydrocarbons and baldheads, provides that pathway.

Hydrocarbons and other Voss are oxidized in the atmosphere by a series of reactions to form carbon monoxide (CO), carbon dioxide (CO2) and water (H2O). Intermediate steps in this overall oxidation process typically involve cyclic stages driven by hydroxyl radical (OH) attack on the parent hydrocarbon, on partially oxidized intermediate compounds, and on other Voss. The Hydroxyl radical is ever-present in the ambient air; it is formed by photolysis from ozone in the presence of water vapor, and also from nitrous acid, hydrogen peroxide, and other sources. In the sequence shown below, R can be hydrogen or virtually any organic fragment. The oxidation process usually starts with reaction 4, from OH attack on a hydrocarbon or other VOC:

RH + OH a H2O + R (4)

This is followed by reaction with oxygen in the air to generate the proxy radical (RO2).

R + O2 + M a RO2 + M (5)

The key reaction in the VOC oxidation cycle is the conversion of NO to NO2. This takes place through the fast radical transfer reaction with NO.

RO2 + NO a NO2 + RO (6)

R can also be generated by photolysis, which usually involves only Voss with molecules containing the carbonyl (C=O) bond. The simplest VOC molecule that contains the carbonyl bond is formaldehyde (HCHO). Because formaldehyde enters into several types of reactions of importance for understanding ozone formation and removal, we will use it to help illustrate these reactions. The oxidation cycle for formaldehyde can be written in the following sequence of reactions.

OH + HCHO a H2O + HCO (7)

HCO + O2 a HO2 + CO (8)

HO2 + NO a NO2 + OH (9)

Hydroperoxyl radical (HO2) is generated by reaction 8, and the hydroxyl radical (consumed in reaction 7) returns in reaction 9 to complete the cycle. In addition, reaction 9 produces the NO2 required for ozone formation, as described above. Also, the carbon monoxide (CO) generated by reaction 8 can react like an organic molecule to yield another hydroperoxyl radical.

OH + CO à H + CO2 (10)

$$H + O_2 + M \rightarrow HO_2 + M \qquad (11)$$

Another component that formaldehyde provides for smog formation is a source of hydrogen radicals.

$$HCHO + h\nu \rightarrow H + HCO \qquad (12)$$

The hydrogen atom (H) and formyl radical (HCO) produced by this photolysis reaction yield two hydroperoxyl radicals via reaction with oxygen, as shown in reactions 8 and 11.

The reactions above comprise the simplest VOC oxidation cycle. Actually, hundreds of VOC species participate in thousands of similar reactions.

Another reaction is central to a basic understanding of ozone formation: the NO_2 plus radical sink reaction that forms nitric acid.

$$NO_2 + OH + M \rightarrow HNO_3 + M \qquad (13)$$

The previous discussion can be used to explain the typical pattern of ozone concentrations found in the urban atmosphere. Nitric oxide concentrations are relatively high in the early morning because the free radicals needed to convert the NOx emissions (which are primarily NO) to NO_2 are not yet present in sufficient quantities. After sunrise, photolysis of formaldehyde (reaction 12) and other compounds starts the VOC oxidation cycle for the hundreds of organic gases present in the atmosphere. Subsequent NO to NO_2 conversion by the peroxy radical (reaction 6) results in NO_2 becoming the dominant NOx species. When the NO_2 to NO ratio becomes large enough, ozone builds up. In the South Coast Air Basin (Los Angeles area), the highest ozone concentrations are observed in the San Bernardino Mountains, many miles downwind from the highest concentration of emission sources (freeways, power generating facilities, and oil refineries along the coast), because the reactions involving the organic gases are relatively slow. Meanwhile, NO_2 concentrations decrease via the sink reaction 13.

Winds disperse and dilute both NOx and ozone. During the day, NOx is also diluted by the diurnal rising of the inversion layer, allowing for more mixing (see section 1.4 for further discussion). For ozone, however, the deepening mixing layer may cause its concentration to decrease on some days and increase on others. Although increased mixing almost always dilutes NOx, the effect of increased mixing on ozone concentrations depends upon whether higher concentrations of ozone are present aloft. Ozone that is trapped above the inversion layer overnight is available to increase the concentrations of ozone generated by the following day's emissions.

During the night, NO and ozone combine to form NO_2 and oxygen via reaction 3 until either the NO or ozone is consumed. Nitrous acid or HONO is also present at night in polluted ambient air in California. Nitrous acid is produced from NO_2 and water, and is also emitted from various combustion sources. Its levels are low during the day because sunlight breaks it down rapidly. At sunrise, sunlight causes gas-phase HONO to react

rapidly to provide NO and OH, two key reactants in the formation of ozone. In this way, they help initiate ozone formation in the morning by being available to react with VOCs as soon as their emissions increase due to an increase in human activity.

Nitric acid (HNO3) was once thought to be a permanent sink for NOx and for radicals. However, nitric acid on surfaces may react with NO to regenerate NO2, which would increase the ozone-forming potential of NOx emissions.

Although VOCs are necessary to generate high concentrations of ozone, NOx emissions can be the determining factor in the peak ozone concentrations observed in many locations (Chameides, 1992; National Research Council, 1991). VOCs are emitted from both natural and anthropogenic sources. Statewide, natural VOC sources dominate, primarily from vegetation. However, in urban and suburban areas, anthropogenic VOC emissions dominate and, in conjunction with anthropogenic NOx emissions, lead to the peak concentrations of ozone observed in urban areas and areas downwind of major urban areas.

The relative balance of VOCs and NOx at a particular location helps to determine whether the NOx behaves as a net ozone generator or a net ozone inhibitor. When the VOC/ NOx ratio in the ambient air is low (NOx is plentiful relative to VOC), NOx tends to inhibit ozone formation. In such cases, the amount of VOCs tends to limit the amount of ozone formed, and the ozone formation is called "VOC-limited". When the VOC/ NOx ratio is high (VOC is plentiful relative to NOx), NOx tends to generate ozone. In such cases, the amount of NOx tends to limit the amount of ozone formed, and ozone formation is called "NOx -limited". The VOC/ NOx ratio can differ substantially by location and time-of-day within a geographic area. Furthermore, the VOC/ NOx ratio measured near the ground might not represent the ratio that prevails in the air above the ground where most of the tropospheric ozone is generated.

Photochemical reactivity, or reactivity, is a term used in the context of air quality management to describe a VOC's ability to react (participate in photochemical reactions) to form ozone in the atmosphere. Different VOCs react at different rates. The more reactive a VOC, the greater potential it has to form ozone. Examples of the more reactive VOCs in California's atmosphere include propene, *m*-xylene, ethene, and formaldehyde. The ARB has helped to pioneer an approach to ozone control that considers the reactivity of each VOC constituent. In California's urban areas, ozone formation tends to be limited by the availability of VOCs. Therefore, the reactivity-based regulatory approach has been applied in conjunction with reduction of NOx emissions. Reactivity-based regulations promote the control of those VOCs that form ozone most effectively, thereby guiding the affected industries (such as manufacturers of motor vehicle and consumer product formulators that use solvents) to choose the most cost-effective processes and designs to reduce VOC emissions. Further information is available from the ARB website, http://www.arb.ca.gov/research/reactivity/reactivityresearch.htm.

Contributions to background ground-level ozone concentrations include downward mixing of ozone from the stratosphere, and ozone formation due to photochemical

Vegetation can reduce ozone concentrations by providing cooling and by removing pollutants. The shade provided by trees lowers ozone concentrations in several ways. It reduces the pollutant emissions from many sources (such as less evaporation of fuel from cooler parked vehicles). By cooling homes and offices, tree shade lowers emissions associated with electricity generation because less power is needed for air conditioning. In addition, cooling reduces the speed of chemical reactions in ambient air that lead to the formation of ozone.

Vegetation can also enhance the removal of ozone through deposition on plant surfaces. The surfaces of leaves and pine needles allow for deposition of ozone and NO2. Several different factors affect pollutant removal, such as how long a parcel of air is in contact with the leaf, and the total leaf area available for deposition. Also, rain tends to reduce ambient ozone concentrations by washing out atmospheric gases as well as gases deposited on leaves and needles.
Other processes involving vegetation can lead to higher concentrations of ozone. For example, trees and other types of vegetation emit biogenic VOCs, such as isoprene, pinenes, and terpenoid compounds. These biogenic VOCs can react with NOx emitted from sources such as cars and power plants to form ozone. Many biogenic VOCs are highly reactive (i.e., especially efficient in reacting to form ozone); some VOCs are even more efficient in forming ozone than those emitted from cars and power plants. In addition, VOCs can be emitted from decomposing leaves.

In the troposphere, the air is usually warmest near the ground. Warm air has a tendency to rise and cold air to sink, causing the air to mix, which disperses ground-level pollutants. However, if cooler air gets layered beneath warm air, no mixing occurs -- the air is stable or stagnant. The region in which temperature is so inverted is called an inversion layer. One type of inversion occurs frequently several thousand feet above the ground and limits the vertical dispersion of pollutants during the daytime. Another type of inversion occurs on most evenings very near the ground and limits the vertical dispersion of pollutants to a few hundred feet during the night. Pollutants released within an inversion tend to get trapped there. When the top of the daytime inversion is especially low [in elevation], people can be exposed to high ozone concentrations. Mountain chains, such as those downwind of California's coastal cities and the Central Valley, help to trap air and enhance the air quality impact of inversions. Cooler air draining into the state's valleys and 'air basins' also enhances inversion formation.

The direction and strength of the wind also affect ozone concentrations. Based on worldwide climate patterns, western coasts at California's latitude tend to have high-pressure areas over them, especially in summer. By preventing the formation of storms, and by promoting the sinking of very warm air, these high-pressure areas are associated with light winds and temperature inversions, both of which limit dispersion of pollutants.

Because tropospheric ozone forms as a result of reactions involving other pollutants, the highest concentrations tend to occur in the afternoon. The photochemical reactions that create ozone generally require a few hours (see section 1.1) after the emissions of substantial VOC emissions, and are most effective when sunlight is intense and air

temperatures are warm. Ozone concentrations in California are usually highest in the summer. The prevailing daytime winds in summer are on-shore, bringing relatively clean air from over the ocean to the immediate coastal areas, but carrying emissions of ozone precursors further inland. With the climatically favored clear skies and temperature inversions that limit the vertical dispersion of pollutants, these emissions are converted into ozone, with the highest concentrations tending to occur at distances a few tens of miles downwind of urban centers (ARB 2002).

During the periods of the year when the sunlight is most intense, much of California experiences a high frequency of inversions, relatively low inversion heights, and low wind and rainfall. As a result, no other State has more days per year with such a high

Ambient ozone concentrations can vary from non-detectable near combustion sources, where nitric oxide (NO) is emitted into the air, to several hundreds parts per billion (ppb) of air in areas downwind of VOC and NOx emissions. In continental areas far removed from direct anthropogenic effects, ozone concentrations are generally 20 - 40 ppb. In rural areas downwind of urban centers, ozone concentrations are higher, typically 50 - 80 ppb, but occasionally 100 - 200 ppb. In urban and suburban areas, ozone concentrations can be high (well over 100 ppb), but peak for at most a few hours before deposition and reaction with NO emissions cause ozone concentrations to decline (Finlayson- Pitts and Pitts 2000, Seinfeld and Pandis 1998, Chameides et al. 1992, Smith et al. 1997). Ozone concentrations vary in complex ways due to its photochemical formation, its rapid destruction by NO, and the effects of differing VOC/ NOx ratios in air. A high ratio of NOx emissions to VOC emissions usually causes peak ozone concentrations to be higher and minimum concentrations to be lower, compared to background conditions. Peak ozone concentrations are usually highest downwind from urban centers. Light winds carry ozone from urban centers, and photochemical reactions create ozone from urban emissions of VOC and NOx. Also, away from sources of NOx emissions, less NO is available to destroy ozone. Due to the time needed for transport, these peak ozone concentrations in downwind areas tend to occur later in the day compared to peak ozone concentrations in urban areas.

Due to the lack of ozone-destroying NO, ozone in rural areas tends to persist at night, rather than declining to the low concentrations (<30 ppb) typical in urban areas and areas downwind of major urban areas, that have plenty of fresh NO emissions. Ratios of peak ozone to average ozone concentrations are typically highest in urban areas and lowest in remote areas (ARB 2002). Within the ground-based inversions that usually persist through the night, ozone concentrations can be very low. In urban areas, emissions of NO near the ground commonly reduce ozone below 30 ppb. In rural areas, however, NO emissions are less prevalent and nighttime ozone may persist well above 30 ppb.

Ambient ozone concentrations tend to vary temporally in phase with human activity patterns, magnifying the resulting adverse health and welfare effects. Ambient ozone concentrations increase during the day when formation rates exceed destruction rates, and decline at night when formation processes are inactive. This diurnal variation in ozone depends on location, with the peaks being very high for relatively brief periods of time

(an hour or two duration) in urban areas, and being low with relatively little diurnal variation in remote regions. In urban areas, peak ozone concentrations typically occur in the early afternoon, shortly after solar noon when the sun's rays are most intense, but persist into the later afternoon, particularly where transport is involved. Thus, the peak urban ozone period of the day can correspond with the time of day when people, especially children, tend to be active outdoors.

In addition to varying during the day, ozone concentrations vary during the week. In the 1960s, the highest ozone concentrations at many urban monitoring sites tended to occur on Thursdays. This pattern was believed to be due to the carryover of ozone and ozone precursors from one day to the next, resulting in an accumulation of ozone during the workweek. In the 1980s, the highest ozone concentrations at many sites tended to occur on Saturdays and the "ozone weekend effect" became a topic of discussion. Since then, the weekend effect has become prevalent at more urban monitoring locations and the peak ozone day of the week has shifted to Sunday. Although ozone concentrations have declined on all days of the week in response to emission controls, they have declined faster on weekdays than on weekends. Thus, the peak ozone period of the week now tends to coincide with the weekend, when more people tend to be outdoors and active than during the week.

The causes of the ozone weekend effect and its implications regarding ozone control strategies have not yet been resolved. Almost all of the available data represent conditions at ground level, where the destruction of ozone by fresh emissions of NO is a major factor controlling ozone concentration. However, most ozone is formed aloft, and the air quality models used to analyze ozone formation have not demonstrated the ability to represent the ozone-forming system aloft with sufficient realism. In addition, several potentially significant photochemical processes are yet to be fully incorporated in simulation models. These deficiencies leave unresolved this fundamental question: does the ozone weekend effect occur because more ozone is formed (aloft) on weekend, because more ozone is destroyed (at the surface) on weekdays, or because ozone formation is more efficient on weekends? .

Ozone concentrations also vary seasonally. Ozone concentrations tend to be highest during the summer and early fall months. In areas where the coastal marine layer (cool, moist air) is prevalent during summer, the peak ozone season tends to be in the early fall. Additionally, as air pollution controls have reduced the emissions of ozone precursors and the reactivity of VOCs, ozone concentrations have declined faster during times of the year when temperatures and the amount of sunlight are less than during the summer. Thus, the peak ozone season corresponds with the period of the year when people tend to be most active outdoors.

Ultrafine-particle levels within 50 yards of a freeway can be as much as 10 times normal. His studies show that exposure to these particles worsens such lung ailments as asthma and accelerates the development of atherosclerosis.

Delfino, epidemiology associate professor, oversees a $3 million National Institutes of Health effort tracking elderly individuals with heart disease to see how daily exposure to traffic-related ultrafine particles affects their condition. His research team has linked these pollutants to significant increases in cardiovascular inflammation, blood-clotting platelets and blood pressure, especially after physical activity.

When considering the effect of road tunnels on the air quality outside the tunnel, it is helpful to
think in terms of the following three zones:
• *Portal vicinity*—within 100–200 m of the tunnel portals. Concentrations at the exit portals can
approach the maximum values found within the tunnels. Within the first few metres, however,
they fall rapidly. Monitoring data have shown that within 100 m they have fallen almost to
background levels. The affected population is thus small. An indicative value for a population
density of 3000 km–2 would be around 100, and the density is likely to be lower near a major
road tunnel portal. In many cases, the resident population will be zero.
• *Local area*—within up to ~1 km of tunnel portals and/or ventilation stacks. The potentially
affected resident population could be 1000s or 10 000s. However, the increase in concentrations (beyond the portal vicinity zone mentioned above) will generally be either small, zero or negative.
• *Wider area*—the area affected by the redistribution of traffic flow associated with the opening
of a road tunnel.

Tunnel openings are a key focus of any tunnel air-quality assessment. It is at the portals and
stacks that the pollutants, which have been released inside the tunnel and have accumulated
rather than been dispersed as in the case of open roads, are finally released into the ambient
environment at high concentrations. From the point of view of the local neighbourhood, it is
at the tunnel openings that the air-quality impact of the tunnel is most keenly felt. This is the
zone within which the road tunnel will inevitably worsen local air quality in comparison to an
equivalent road without a tunnel.
Air-quality assessment of the impact of the openings tends to occur in the tunnel planning process, and is often required for planning approval. In this case, the assessment is necessarily

a modelling exercise. In a few cases, monitoring has taken place after tunnel opening to check
the effect of the tunnel on ambient air quality near the openings, to check the validity of the
modelling results, and to further inform model development.
A simpler tunnel ventilation system involves the venting of contaminated air at the exit portals.
If it is considered that the impact on the local environment is too high, the tunnel air can be
vented elsewhere, at a ventilation station and possibly via a tall stack. In some cases, this stack
is some distance from the tunnel so that tunnel air may be vented into the atmosphere in a
nonresidential location. Variable control of the ventilation system can change the distribution of air
vented through the portals and through alternative openings. One of the great advantages of road
tunnels is the opportunity to deliberately site portals (or stacks) away from sensitive receptors so
that road transport emissions may be removed from dense residential areas, improving local air
quality.

Pollutant concentrations are not necessarily worse in the vicinity of tunnel portals than they were
before the tunnel was opened. This may be the case if the pretunnel site of the portals was a
major road junction with congestion and queuing traffic. This illustrates how each tunnel must be
assessed on its own merits, and environmental assessments should consider the induced changes
on traffic flow in general as well as emissions from within the tunnel.
coinciding with minimum dispersion due to lower wind speeds, with the plume directed in a
different direction than the annual prevailing wind.
This effect of the morning 'footprint' being different from that at other times in the day is
compounded by the diurnal and seasonal variations in the vertical ventilation of the urban
canopy. Studies have shown that vertical dispersion of substances emitted at the surface is
reduced in the morning due to the reduction in vertical motion and turbulence associated with
nocturnal cooling of the surface. In many parts of the world, nocturnal inversions (ie when
the atmosphere becomes thermally stratified, effectively putting a 'lid' on the surface layer of
the atmosphere) are common. Although this is partly offset in urban areas by the release of

anthropogenic and stored heat from the surface through the night, surface concentrations still
remain raised relative to emissions. Even in the absence of inversions, direct measurements have
shown that ventilation of the urban canopy is inhibited at night (eg Dorsey et al 2002, Longley
and Gallagher 2006).

Destruction of inversions and an increase in the rate and depth of vertical dispersion begins once
heating begins, from both anthropogenic sources and solar radiation. The impact on morning
concentrations of traffic-related pollutants depends not only on the strength of any inversion, the
size of the anthropogenic pollutant and heat emission, and the strength of solar radiation, but
also the relative timing of sunrise and emission peak. In general, morning concentrations will be
higher if the emission peak occurs before sunrise. The maximum solar insolation in summer varies
little with latitude, but varies substantially in winter due to shorter daylight periods and smaller
solar zenith angles. Similarly, the seasonal variation in the number of daylight hours increases
with latitude. Thus, cities at higher latitudes may be expected to have a greater seasonal variation
in urban concentrations of traffic-related pollutants. Peaks in particle concentration caused by
poor turbulent ventilation during emission peaks will have greater significance in a high latitude
city in winter when heating and traffic emissions are high, but solar flux is low, sunrise is late and
sunset is early. Such conditions also favor the nucleation of ultra fine particles.

Within the road tunnel we can reasonably assume that the emissions come solely
Or largely from within that tunnel, as discussed earlier. However, outside the tunnel this is not
Any assessment therefore needs to clearly articulate whether it is the impact of the
Tunnel itself that is being assessed, or the traffic within it. In this context a road tunnel should
Be considered as a road along which all the normally evenly distributed emissions have been
Collected and emitted at a few points. Thus, from an air quality point of view the tunnel acts
To redistribute the emissions and hence the local impacts. When asking the question, 'What

Effect does tunnel X have on its neighborhood?' we must be very clear about whether we are
Comparing with the same road and traffic in a tunnel or distributed over the local road network.
Most new road projects not only redistribute traffic but can attract extra traffic to an area. This is especially important as drivers avoiding the tunnel once tolls are imposed, lead to greater congestion on surface roads near tunnel entrances. Regardless of such behavior, traffic in these areas is predicted to change as a direct result of the tunnel opening. So the question arises: do emissions
From surface roads, such as tunnel access ramps and interchanges, constitute part of the tunnel's
Air quality impact? Therefore, should the contribution of local tunnel-influenced surface roads count
As part of background level or part of tunnel emissions?

However, strong solar heating leading to thermal instability in the atmospheric boundary layer can
Lead to the formation of large turbulent eddies. Such eddies can momentarily and intermittently
Advect a relatively undiluted plume rapidly drawn down to the surface in a process known as
'Looping'. The effect is highly intermittent and likely to affect only a much localized area. The
Effect is also only likely to last for a short period of time (minutes to a few hours), and would
Be experienced at the surface as a brief period of polluted air followed by a period of unusually
Clean air. Consensus is lacking as to whether such brief impacts are significant and should be
Considered in an impact assessment. This highly localized effect is likely to escape monitoring,
Except in the case of a 'lucky' strike, but most 'air shed' scale atmospheric dispersion modeling
Tools are also not designed to predict such processes, other than the average effect over a
Period of at least an hour. The actual location and magnitude of the peak effects are inherently
Very unpredictable for modeling. Alternative modeling approaches that is more appropriate
May be available, but no examples were found in the literature of such models being applied
To tunnels.

The advantages of tall stacks are also somewhat diminished if sited on valley floors. The trapping
Of pollutants emitted in valleys has been known for over a century. Causes for pollutant trapping

Include sheltering from the wind, inversions capping the valley, katabolic flow down valley
Sides and interactions between these processes. For achieving the full benefits of stack venting
Compared to portal emissions in populated areas, especially if sensitive receptors are located
Above the valley or on valley slopes.
Concern about the potential for adverse health effects from air pollution, especially combustion
Pollutants, is not new and has led to a wide variety of epidemiological and toxicological research
Directed at understanding the nature of these effects, the dose-response relationships and the
Consequences of combined exposures.

Air pollution is positively associated with death from lung cancer and cardiopulmonary disease but not with death from all other causes. Mortality is most strongly associated with fine particulates, including sulfates (Dockery et al 1993). A re-analysis confirmed the 26% increase in all-cause mortality. A small-area spatial study in Los Angeles found an indicator for traffic emission exposure was associated more strongly with ischemic heart disease than with cardiopulmonary or all-cause mortality. Effects for ischemic heart disease are possibly relevant to short-term effects from tunnels.
The overall association between urban air pollution and respiratory morbidity has also been
Investigated, including exacerbation of asthma, allergy and respiratory infections in both adults and
In general, literature has confirmed adverse effects, including the biological mechanisms through which PM is able to exert toxic effects. For children, although air pollution has long been thought to exacerbate minor acute illnesses, recent studies have suggested that air pollution, particularly traffic-related pollution, is associated with infant mortality and the development of asthma and atop.
Effects on cardiovascular disease from urban air pollution have been reported. For clinically manifest coronary heart disease, particularly strong adverse effects were seen for residential proximity to a tunnel and age under 60 years or for people who had never smoked. Nonfatal myocardial infarction has been associated with motor vehicle, motorcycle, bicycle or bus travel in the preceding one hour, giving an odds ratio of 2.73, 95%CI 2.06 to 3. A study found nonfatal myocardial infarction associated both with residential proximity to main roads and cumulative traffic within 100 m of residence plausible biological mechanisms for associations between cardiovascular disease and air pollution has been observed.

There is evidence that ambient air pollution (mainly traffic related) contributes to incidence of asthma in children. PM and O3 contribute to exacerbations and increased rates
Of hospitalization for asthma. A link between air pollution, and impaired lung function and lung development in children and adolescents has been demonstrated in a range of

longitudinal studies and locations. Impaired lung function in later life has been described as a major mortality risk the presence of heavy vehicles is a likely risk characteristic of tunnels. The risks to children from exposure to busy roads is to be avoided wherever possible, with consequences to lifetime lung function and healthy survivorship if there is impairment of lung development while young.
Effects of air pollution on fetal development including overall growth (birth weight) and preterm birth as well as causation of asthma with traffic exposure have been shown... The possibility of adverse effects on lung development in uteri associated with maternal exposure to pollutants has been found. Epidemiological studies have shown an association between infant respiratory morbidity and exposure to pollutants after birth. Childhood development of cancer may be affected by traffic emissions increased cancer risk was found among offspring of mothers living in high traffic-density areas.

Studies of both hospitalizations and mortality studies for relevant urban air pollution effects have
Found the contribution of air pollution to adverse health status presented by traffic emissions. However, none presents a quantitative basis for evaluation of effects for tunnel users. This is because the tunnel exposures are short and intense, whereas the models used to quantify health effects for ambient urban pollution use information from daily or longer exposure periods. They also do not clarify whether residence near a tunnel confers additional risk compared to urban residence elsewhere.
Studies have estimated burdens of hospitalization associated with air pollution and likewise estimate of mortality. No studies have been identified that address disability-adjusted life years in the context of road tunnel associated effects.

Exposure to road tunnel air results in a lower airway inflammatory response, with
Cell migration within the lower airways together with signs of an initiated signal transduction in
The bronchial epithelium. Another important aspect of risk for people living near tunnels is the quality of the air in the indoor environment, an area of great uncertainty. However, it is reasonable to assume that external air pollution concentrations are a reasonable estimate of indoor exposures. It is vital to
Establish what the localized pattern of air quality actually is in residential areas near tunnels.
Quality of life among people living near tunnels has been found to be lower than the norm. Residents were experience health problems from portal emissions. Air pollution (measured by residence vicinity to freeway tunnels) impairs lung development of children. Reduced lung function development in childhood is translates into lung function deficit throughout life. Reduced lung function later in life has been described as second only to the exposure to tobacco smoke as a risk factor for death.

The results of studies indicate that current levels of air pollution have chronic, adverse effects
On lung development in children from age 10 to 18 years, leading to clinically significant deficits

In attained FEV1 (the forced expiratory volume in the first second) as children reach adulthood.
A linear concentration-response relationship was observed between the proportions of children
Under 18 years of age with an FEV1 of < 80% of predicted and long-term exposure to PM2.5.
This exposure was determined through monitoring in each of the 12 communities from which
The cohort was recruited. This is highly relevant to communities living near tunnels and stacks if
These produce deterioration of the quality of the urban air compared to general levels of current
Air pollution. Associations for the effect were seen with NO2 and PM2.5, both of which
Are components of tunnel emissions?

Residence within 100 yards of a major road was associated with an increased risk of lifetime asthma. These are important findings if transferable as a risk to children with residential proximity to tunnels and their approach roads. Children who live within 600 yards of a freeway have significantly
Reduced eight-year lung function compared with those who lived at least 2000 yards from a freeway.
Children with no asthma and no active tobacco use also showed this significant association between
Residential distance from a freeway and lung function. However, no freeway road distance was
Not associated with reduced lung function, which suggests the risk was associated with features
Of the emissions from a freeway. This is a relevant study for road tunnel risks in a residential
Neighborhood, if the emission characteristics of busy freeways and tunnels are similar.
Research that has associated diesel exhaust with inflammatory effects in the bronchial wall together with adverse
Functional consequences. Studies have reported experimentally observed effects in cells exposed to traffic associated toxic materials from a road tunnels.

A study among healthy young
Nonsmoking men to assess effects of PM2.5 in vehicles. Mean nine-hour exposure was 24 go m–3 of PM2.5. A few hours after exposure, undesirable effects were seen in vigil activity (entopic beats),
Peripheral blood inflammatory markers (C-reactive protein) and coagulation markers (fibrinogen).
The largest effect on heart-rate variability was seen on waking the morning after the exposure. This study is significant in terms of road tunnels because it heralds cardiovascular effects that involve inflammation, coagulation and cardiac rhythm among a group at otherwise low risk for such outcomes. While the measured exposure was to PM2.5, this arose in a setting of exhaust and highway air exposure within a vehicle and

hence reproduces some of the aspects of combined pollutant exposure that might arise in a tunnel.

CO becomes a danger to human health when there is a combustion source in an inadequately
Ventilated space. Underground tunnels are classic situations for public health
Risk. CO binds with hemoglobin to form Cob, which reduces the oxygen-carrying capacity
Of the blood and impairs the release of oxygen to the tissues. The risks are particularly significant
In pregnancy. Raised Cob levels are associated with risks of abnormal heart function and risks
For vehicle accidents, possibly through short-term reversible neurological effects. Excessive CO within a tunnel is dangerous, especially for people with ischemic heart disease and
Pregnant women

Oxides of nitrogen are especially important with regard to road tunnels because concentrations
Can become significantly elevated in poorly ventilated environments Risks are great for elevations of NO2 in the community nearby tunnels and stacks. NO2 is associated with various adverse impacts on health, including increased respiratory symptoms in children, onset of respiratory symptoms among infants and increased bronchitis symptoms for children with asthma. Other demonstrated effects among people with asthma include direct effects on lung function and increased bronchial responsiveness at levels of 200 go m–3 and above. NO2 exposure to concentrations within a road
Tunnel can be sufficient to produce adverse effects. Short exposures (30 minutes
Or less) to NO2 at concentrations expected in tunnels (100–400 ppb). Significantly increase airway resistance and increased late-phase reaction to allergen challenge. There is a significant increase in histamine reactivity after exposure to 270 ppb NO2, and a tendentious increased reactivity with exposure to 140 ppb and 540 ppb. There is a significant increase in reaction to histamine in the asthmatic subjects at lower concentrations. Airway resistance increases after 20 minutes exposure to 240 ppb NO2 and decreases after exposure to 480 ppb. Of most relevance to tunnel exposures are the adverse effects on people with mild asthma to 500 ppb after 5 minutes of NO2 exposure. Inflammatory markers increased in reaction to pollen challenge. Where an event delays traffic in tunnel, there are risks of adverse effects among those with asthma.

Adverse effects due to PM of size 10 am or less (PM10). Is broad, affecting the respiratory and cardiovascular systems and extending to children and adults and to a number of large, susceptible groups within
The general population. The risk for various outcomes has been shown to increase with exposure and there is little evidence to suggest a threshold below which no adverse health effects would be anticipated. In fact, the lower range of concentrations at which adverse health effects has been demonstrated is not greatly above the background concentration. The epidemiological evidence shows adverse effects of particles after

Since alkyl lead is no longer added to gasoline as 'anti-knock' (and diesel fuel never Contained lead additive), the possibility of lead exposure in tunnels from inhalation of traffic exhaust is no longer likely with these changes in fuels. However it is possible for vehicles to disperse residual lead picked up from the roadway. The effects of lead exposure include increased risk of minor congenital abnormalities, intrauterine growth retardation, spontaneous abortion, delivery complications, delays in physical and mental development, lower intelligence quotient levels, and shortened attention spans, impaired hearing, and increased behavioral problems. Fetuses at any stage of development and children under the age of six years are at the greatest risk of adverse health effects. This increased vulnerability is due to the fact that the brain and central nervous system is still developing. Recent studies have shown that even low levels (< 5 go do–1) of lead exposure can result in intelligence quotient deficits.

Clearly, public concerns about benzene risks associated with road tunnels have a firm basis. Benzene is classified as *carcinogenic to humans Benzene* is a cause of leukemia in humans. The adverse effects of benzene include haemototoxicity, genotoxicity and carcinogenicity. These effects are relevant for road tunnel users with repeated intense exposures over timeas well as residential exposure risks in the vicinity of tunnels. Risks from chronic exposure to benzene can include bone marrow depression (leucopenia, anemia or thrombocytopenia). Brief intense exposures to polluted air in a road tunnel are likely to exceed the threshold to produce these effects.

Formaldehyde is ubiquitous. It is released as a product of metabolism and produced in the course
Of both natural processes and human activities that involve the combustion of organic materials,
For example bush fires, tobacco smoking and motor vehicle fuel combustion. Formaldehyde is carcinogenic to humans. Formaldehyde causes nasopharyngeal cancer in humans, cancer of the nasal
Cavity and Para nasal sinuses and leukemia. Formaldehyde is regarded as carcinogenic to humans following inhalation exposure. The potential health effects on communities living around road tunnels, especially homes near tunnel portals where there are significant emissions, exposure to tunnel air pollutants is likely to be significantly above background levels. Characteristics of the air near a tunnel most likely to affect users are particulate matter, including coarse, fine and ultra fine particles, carbon monoxide and NO2. For tunnel users, possible effects include immediate or delayed aggravation of asthma. Accrued effects from repeated tunnel use might include small increases in lifetime risk of cancer and potential for increased bronchitis events or respiratory infection. NO2 appears to be a key pollutant for which guidelines and controls are needed, both as an air quality indicator and a health risk. People who live near tunnels or their stacks are at risk as the presence of the tunnel alters the ongoing quality of the neighborhood ambient air. Risks to cardio respiratory health may arise from exposure to contaminated air from road traffic emissions, including tunnel emissions. A particular concern is the association between impaired lung development in children and emissions

from traffic. Particulates and volatile compounds including benzene may produce an increased lifetime risk for cancer.

There is confirmed evidence that people living near tunnels or their stacks experience increased exposure to pollutants. Residents living near tunnels and stacks have consistently reported increased levels of dust fallout. Pollutant exposure levels for people living near tunnel portals or stacks should be a major concern. Nitrogen dioxide and PM are important indicators for tunnel effects on residential air quality, and represent aspects of the pollutant mix that are likely to be associated with adverse cardiopulmonary effects. There is sufficient evidence to be able to attribute events such as asthma attacks, angina and acute respiratory infection directly to a tunnel exposure. Adverse cardiopulmonary health outcomes are clearly associated with exposures to high levels of traffic emissions in urban settings

The California Endangered Species Act (CESA) states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved. The Department will work with all interested persons, agencies and organizations to protect and preserve such sensitive resources and their habitats.

There is evidence that chemical reactions in the atmosphere are detrimental to the plant and human growing process. Low level ozone, known as Tropospheric Ozone, has been shown to inhibit plant growth and can cause cell death. Tropospheric Ozone has also been proven to be harmful to human health causing respiratory ailments and death. The chemistry involved in understanding Tropospheric Ozone is complex. Tropospheric Ozone is harmful to life while Stratospheric Ozone is essential to protecting life. This point alone confuses many people. Tropospheric Ozone occurs much closer to the earth's surface; where as, Stratospheric Ozone is high up above the earth's surface. Tropospheric Ozone will never become Stratospheric Ozone. Tropospheric Ozone is “bad ozone” for the duration of its existence. The formation of Tropospheric Ozone occurs under certain conditions that include the combination of air pollutants, sunlight and heat. Auto emissions are a leading cause of human induced Tropospheric Ozone. Global warming is also a human induced contributor to the problem. Despite improved fuel efficiency, Tropospheric Ozone levels have not been declining. A massive impact on vegetation is now becoming evident. Over the past few years, ethanolhas become a mandated additive to gasoline blends.

Ozone affects plants in several ways. High concentrations of ozone cause plants to close their stomata. These are the cells on the underside of the plant that allow carbon dioxide and water to diffuse into the plant tissue. This slows down photosynthesis and plant growth. Ozone may also enter the plants through the stomata and directly damage internal cells.

Tropospheric ozone also is one of the most significant and damaging airborne pollutants to plant life. Therefore, it is known as a powerful "phytotoxin." Symptoms of plant

damage can appear as early as one day after high exposure of several hours. Noticeable effects to the leaves of crops include changes in shape, discoloration and necrosis (i.e., cell death). More subtle effects include reductions in plant size and weight, due to the fact that ozone pollution can decrease a plant's ability to perfom photosynthesis. Ozone pollution also takes its toll on forests. Increased concentrations of ozone pollution are the primary cause of the decline in pines in southern California and the eastern United States. Ozone pollution has also been considered as the primary cause of many declining European forests.

Photo-oxidants, and especially ozone, have been widely regarded as harmful to vegetation since the 80's, although in the 60's its effects were already detected in California. However, it is during the last decade when ozone become an issue of concern in Europe. Ozone pollution, unlike fluoride or sulphur dioxide, does not leave elemental residue that can be detected by means of analytical techniques in vegetative tissues. Thus, ozone injury in leaves, are the only evidence easily detected in the field. So far, experimental studies have focused mainly on explaining the mechanisms that produce damage, rather than to identify and characterise symptoms observed in the field at a regional scale. Recent researches have increased our knowledge on the subjacent mechanisms that explain the effects of ozone on crops, and to a lesser extent, on trees and other wild plants. A long term effect of this pollutant on forests may affect some of their functions, e.g. their role in water and energy balances, protection against soil erosion, cover of vegetation, and aesthetics of the landscape. One possible effect on plant communities might be the change in species composition and loss of biodiversity, an important potential threat when regions with many endemic plants are considered. Furthermore, before these problems are approached, more basic and detailed studies on the sensitivity of the species under different environmental conditions, including e.g. nutritional aspects, have to be undertaken. Scientists have long known that ozone is a greenhouse gas, trapping radiation within the atmosphere and leading to rising global temperatures. But the new study suggests that ozone may have a much more significant climate impact by adversely affecting plants' ability to remove carbon dioxide from the atmosphere.

Conditions in urban environments place trees under numerous stresses including compacted soil, soil moisture extremes, and reduced soil fertility. Polluted air is another stress that contributes to the decline of urban trees. Air pollution may cause short-term (acute) damage, which is immediately visible, and long-term (chronic) damage, which can lead to gradual tree decline. Long-term damage may predispose trees to other disorders, making diagnosis difficult.

The major phytotoxic (toxic to plants) air pollutants, in decreasing order of severity, are:
* oxidants [ozone and peroxyacetyl nitrate (PAN)]
* sulfur dioxide
* particulates

Gaseous pollutants

Gaseous pollutants, such as ozone and sulfur dioxide, enter plants through natural openings, usually stomates, and react within leaf tissues to inhibit photosynthesis. Acute damage levels can be high enough to cause sudden tissue damage and death. Chronic damage occurs when small amounts of toxic gases enter leaves and do not initially cause tissue death, but inhibit leaf functions. Whether or not a pollutant causes acute or chronic damage depends upon tree species. Individual trees within a species often display varying degrees of tolerance to the same pollutant.

Ozone

Ozone is the most damaging air pollutant. The action of sunlight (ultraviolet radiation) on molecular oxygen and oxides of nitrogen spontaneously generates ozone. The organic compounds in automobile exhaust enhance ozone accumulation. Ozone can move across great distances to cause tree damage far from its origin and is therefore classified as a non-point-source pollutant.

The extent of tree damage depends on the concentration of ozone, the duration of exposure, and tree sensitivity. Acute damage to deciduous trees causes marginal leaf burn and dot-like or irregularly shaped lesions or spots that may be tan, white, or dark brown, and that may spread over entire leaves. Another common symptom is bleaching of the upper leaf surface. Acute damage to conifers causes browning at the same point on all needles in a bundle (needle cluster).

Chronic damage occurs with repeated ozone absorption in amounts not high enough to cause sudden tissue death. Chronic symptoms include chlorosis (general yellowing), premature leaf drop, reduced growth, and progressive decline of tree health and vigor. Ozone damage also increases a tree's susceptibility to insect damage. As ozone restricts carbohydrate movement in leaves, the resulting higher sugar concentration makes the leaves more susceptible to insect attacks.

PAN is produced through the interaction of sunlight and power plant and/or automobile emissions. High levels of PAN and ozone are toxic to trees, but ozone is more abundant and injurious.

Sulfur dioxide is primarily a result of fossil fuel burning for electricity generation, and to a lesser degree, the processing of steel and other ores. Sulfur dioxide is classified as a point-source pollutant.

Acute sulfur dioxide damage causes severe leaf scorch, usually on upper interveinal leaf surfaces. Younger leaves are generally more sensitive. Moisture in the air or on leaf surfaces may combine with sulfur dioxide to form sulfuric acid. Sulfuric acid causes leaf scorch, spotting defoliation, and can also cause tree death over a large geographic area with many affected species. Chronic sulfur dioxide damage results in leaf chlorosis (colors of the chlorosis ranging from white to red) and tree decline.

Particulates (dusts), classified as point-source pollutants, are generated by major industrial processes as well as by quarries, rock-crushing plants, cement plants, soil erosion, and auto exhaust emissions. Particulates are not extremely damaging, but can inhibit or reduce photosynthesis by plugging stomates. Particulates are usually washed from leaves by rain or irrigation, and are therefore more harmful during dry periods.

Air currents carry all air pollutants. Air movements and geographic features influence pollutant concentration, chemical structure, and the duration of tree exposure to pollutants.

Air temperature determines vertical movement of air pollutants. Under normal conditions, warm air near the soil surface causes pollutants to rise vertically. Pollutants rapidly become diluted and blown away by upper level winds before contacting many trees. However, thermal inversions (cool air at the surface beneath warmer air above) restrict movement and dispersal of pollutants, resulting in increasing phytotoxic levels and prolonged exposure. These inversions usually occur in narrow valleys close to mountain ranges, and near large bodies of water.

Temperature also influences a pollutant's chemical reaction rate. When the temperature is high, more photochemical oxidants are produced. These oxidants cause more severe damage during sunny hot weather and less damage during cool cloudy weather. Atmospheric moisture causes pollutants to become solutions, increasing their toxic potential.

Toxic gases are the only airborne chemicals that have been demonstrated to cause detrimental effects on forest trees in North America. Ozone is the only regionally dispersed pollutant known to have injured foliage, decreased radial growth, decreased resistance to insects and diseases, and increased mortality of sensitive tree species over a wide geographic range. All of these effects have been observed in eastern white pine (Pinus strobus L.) throughout its natural range, in some conifers and hardwood trees in southern California, and in a few tree species in the central Appalachian Mountains. Very little research has been done to determine effects of airborne chemicals on forests as a whole. At present, there is no conclusive evidence that acid deposition or other regionally dispersed pollutants are affecting the productivity of any forest in North America.

The mixed conifer forests in the San Gabriel and San Bernardino mountain ranges east of Los Angeles have been exposed to oxidant air pollution since the early 1930's (Miller 1973). The symptoms of chronic ozone injury to sensitive tree species are observed as far as 120 km east of central Los Angeles (Miller 1983). The extensive visible injury and a concern for the possible effects on forest ecosystems led to a number of interdisciplinary studies in the San Bernardino National Forest.

Sensitive tree species, such as ponderosa pine (Pinus ponderosa Dougl. ex Laws.) and Jeffrey pine (Z? jeflreyi Grev. and Balf.), began showing symptoms of

unidentified foliar injury in the early 1950's (Millecan 1971). By use of methods
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that meet the criteria of 'consistency' and 'responsiveness,' Miller (1983) identified ozone as the causal factor. Approximately 10 to 15% of the ponderosa and Jeffrey pines in a 10 000 ha area of the forest had moderate to severe foliar injury from ozone and other photochemical oxidants (Parmeter et al. 1962, Wert 1969, Miller and Millecan 1971). Less severe injury symptoms were found on a similar number of white fir (Abies concolor Lindl. ex Hildebr.), incense cedar (Caleocedrus decurrens (Torr.) Florin), sugar pine (P. lambertiana Dougl.) and California black oak (Quercus kelloggii Newb.).
Ponderosa and Jeffrey pines are the tree species most susceptible to ozone injury in southern California. Visible foliar injury appears on sensitive individuals of these species whenever 24-h average ozone concentrations exceed 0.05 to 0.06 ppm (Miller et al. 1969). The ranking of these species in order of observed frequency and severity of injury (high to low) is ponderosa pine, Jeffrey pine, white fir, California black oak, incense cedar and sugar pine (Miller 1983). Photosynthesis and stomatal responses to light and temperature in ponderosa pine are reduced with accumulated ozone dose (Coyne and Bingham 1981). Rates of photosynthesis of ponderosa pine trees with 'slight,' 'moderate' and 'severe' loss of needles were reduced to about 10% of their maximum rate after experiencing exposure of 800, 700, and 450 parts per million hours (ppm-h) of ozone, respectively. For current year needles, severely damaged trees had only one-third the leaf area index of slightly damaged trees (Axelrod et al. 1980). Trees injured by ozone also retained a smaller proportion of the assimilated carbon after respiratory losses (Coyne and Bingham 1981).

From 1950 to 1975, chronically injured ponderosa pine and white fir grew less in diameter and height than trees without visible injury (McBride et al. 1975, Ohmart and Williams 1979, Miller et al. 1977, Taylor 1980). Approximately 33% of uninjured trees growing beside or near the injured trees had increased growth rates over this same period (Miller 1983).

Parmeter et al. (1962) found that the vigor of root systems and crowns of injured pines was significantly less than the vigor of uninjured trees. The feeder and mycorrhizal rootlet systems of injured trees showed marked deterioration. The nutrient content of foliage in injured trees was also lower (Miller et al. 1977). Fewer cones were produced on chronically injured ponderosa and Jeffrey pines than on uninjured trees (Luck 1980, Taylor 1980). Also, acorn production by California black oak appeared to be less in stands where foliar injury was greatest and growth rates lowest (Miller et al. 1980).

A pest survey conducted in 1977-1978 in the western part of the San Bernardino National Forest attributed 53% of the mortality of ponderosa pine to bark beetles alone, 10% to bark beetles and urban construction, 10% to a combination of bark beetles and root diseases, and 17% to other abiotic and biotic factors

(Smith and Roettgering 1982). This survey confirmed earlier studies indicating that the majority of ozone-injured pines were killed by the western pine bark beetle (Dendroctonus brevicomis LeConte) (Stark et al. 1968, Stark and Cobb 1969, Cobb and Stark 1970). These and other studies by Miller et al. (1977)
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suggest that a given population of bark beetles could kill more trees and increase at a greater rate in stands with a high proportion of ozone-injured trees than in stands with a lower proportion of injured trees (Miller 1983). James et al. (1980) found that controlled fumigation of 6-year-old ponderosa and Jeffrey pine seedlings with ozone caused increased infection and colonization of seedlings with annosus root rot (Heterobasidion annosum Fr.).

In the late 1960's, Miller and Millecan (1971) conducted a field survey of oxidant injury on 16 native conifer species of California forests from San Francisco to San Diego. Tree injury was identified and classified according to needle retention, degree of chlorotic mottling on needles, and suppression of shoot growth. Some trees with oxidant-type injury were found in most forests. In the San Bernardino forest, oxidant injury symptoms were found on the species cited above as well as on Coulter pine (Pinus coulteri D. Don.), Monterey pine (P. radiata D. Don.), bigcone Douglas-fir (Pseudotsuga macrocarpa Mayr.), lodgepole pine (P. contorta Dougl.), and Torrey pine (P. torreyana Parry). No oxidant injury was found on western juniper (Juniperus occidentalis Hooker), giant sequoia (Sequoiadendron giganteum (Lindl.) Buchh.), redwood (S. sempervirens D. Don Endl.), singleleaf pinyon pine (P. monophylla Torr. and Frem.), knobcone pine (P. attenuata Lemm.), and digger pine (P. sabiniana Dougl.). The worst injury was found on species growing in the south coast and southeast desert air basins near Los Angeles. The frequency and severity of injury throughout southern California were consistently associated with prevailing wind directions from population centers.

Every year, periodic high concentrations of ozone injure the foliage of randomly distributed eastern white pine trees in various locations within the natural range of this species. High concentrations of ozone near Los Angeles, California regularly injure 10 to 20% of the trees growing in the nearby San Bernardino Mountains (Miller 1983). Unreplicated open-top chamber experiments in the mountains of Virginia (Skelly et al. 1982, Duchelle et al. 1982) and southern New York (Wang et al. 1986) indicate that oxidants either alone or with other gaseous pollutants may be reducing growth rates of some of the trees in these regions. A few experiments with small trees indicate that photosynthesis and growth rates can be significantly reduced without producing visible signs of injury (Botkin et al. 1971, Reich and Amundson 1985, Wang et al. 1986).

But does anybody stop to think what ozone must be doing to long-lived species - trees and shrubs and even lowly mosses - that suffer from cumulative exposure, season after season?
Answer: it's killing them incrementally - and most tragically, imperceptibly to most people.
The preindustrial level of ground-level ozone was in essence, zero. When it became obvious over fifty years ago that inversions and high spikes downwind of polluting sources were killing vegetation and sickening people, industries very cleverly learned to disburse the precursors. They built tall stacks and restricted some auto emissions, thus reducing much visible smog, and reined in locally extreme peaks of ozone concentration. Because the VOC's travel across continents and oceans, over decades the global background concentration has been inexorably rising - damaging trees everywhere on earth at a rapidly accelerating rate. Virtually no one is asking what role ethanol emissions might play in the most recent increase in dying trees.
That trees are dying is empirically verifiable by a cursory inventory. Characteristic symptoms you can readily locate in any woods, suburban yard, park or mall include stippled, singed foliage; yellowing coniferous needles; thinning, transparent crowns; cracking, splitting, corroded, oozing and stained bark; early leaf senescence; loss of autumn radiance; holes; cankers; absence of terminal growth; breaking branches; and ultimately, death. Why isn't this simply due to climate change and/or drought? Because, the identical foliar damage is to be found on plants growing in pots with enriched soil and regular watering - and even aquatic plants that are always in water.
The causality is well-documented in published research and just as well understood as the relationship between tobacco smoke and lung cancer. The reticence preventing scientists and foresters from raising the obviously commensurate degree of alarm is suicidal denial of an existential threat. As if the damage to vegetation weren't enough, according to the WHO, ozone also kills more Americans every year than breast and prostate cancer combined - more than automobile accidents.

When you hear weather reports advising an ozone alert in a heat wave, followed by estimates of deaths attributed to the temperature, it is just another distraction. Ozone kills people, especially those most vulnerable with asthma, emphysema, respiratory illnesses - even athletes exercising outdoors! - and is linked to diabetes and cancers.

When foresters in a revolving door with the lumber industry blame bark beetles for killing trees, that is as inaccurate and misleading as to claim pneumonia killed an AIDS victim. Controlled experiments have proven that ozone weakens the immune system of trees, and debilitates their natural defenses against insects, disease, and fungus. Their wood loses flexibility and makes their branches more likely to break from wind, ice and snow. Their roots deteriorate from acid rain, which leaches essential nutrients from the soil, and makes them more likely to fall over. Mudslides are becoming more commonplace as root systems of perennial plants shrivel, and wildfires are proliferating at an unprecedented rate.

Ozone uptake is a function of both ambient ozonel evels and stomatal conductance. Ozone affects vegetation by direct cellular damage (especially to palisade mesophyll cells) once it enters the leaf through the stomates. Gaseous O3 diffuses from the atmosphere, through the stomata, and dissolves in water surrounding the cells before entering the cells themselves. The cellular damage is probably the result of changes inmembrane permeabilities and may or may not result in visible injury or reduced growth or yield [42]. Stomata generally open in response to light and warmth andclose in response to aridity, water stress, and high CO2. A secondary response to ozone is a reduction instomatal conductance, as the stomata close in responseto increased internal CO2 that occurs because of the reduced photosynthetic activity caused by the ozone. It has been suggested that the decrease in stomatal conductance caused by O3 is similar in magnitude to the 10% decrease caused by CO2 increases since pre-industrial conditions Decoupling is found between photosynthesis and stomatal conductance as a result of long-term ozone exposure. Generally, the stomatal control of ozone uptake provides a coupling between environmental conditions and ozone uptake as well as a potential negative feedback to ozone uptake itself. Not all ozone enters the leaves through the stomata. A smaller amount of ozone can enter leaves by direct absorption along leaf exterior surface. Ozone uptake depends strongly on stomatal conductance, which varies with climatic and atmospheric conditions. While ozone may reduce stomatal conductance somewhat, it generally increases water stress by reducing root growth. Many studies have noted less ozone damage under drought conditions because of the dependence on stomatal conductance. Results of experiments showed that ozone damage to biomass was less with reduced soil moisture due to stomatal controls. However, other studies showed that plants exhibited more ozone sensitivity under moisturestress conditions. Experiments with three-year-old beech trees in growth chambers have shown that while ozone may decrease stomatal conductance under moist conditions, it may actually increase stomatal conductance under drought stress. Higher ozone sensitivity under more humid atmospheric conditions due to higher stomatal conductance. Under future conditions of higher CO2 fertilization, it is possible that ozone damage will be reduced due to lower stomatal conductance. Besides stomatal controls, plant defense mechanisms also regulate the effective ozone uptake, which is defined as the difference between the stomatal ozone uptake and the defensive response [57,67]. Detoxification by chemical reactions occurs from both existing antioxidants and those stimulated by ozone itself. Emissions of NO within leaves also help to destroy ozone. Because antioxidants are produced from photosynthates, lower levels of antioxidants at night may lead to greater sensitivity to ozone at that time. Also, as ozone levels early in the day deplete antioxidant supplies, plants may be subject to more effective ozone uptake later in the day when ozone levels are normally highest. In addition to defense by chemical reactions, repair of injured tissue and alteration of metabolic pathways occurs in response to ozone. While stomatal regulation may limit ozone uptake, by also limiting photosynthesis, it also reduces the availability of plant repair mechanisms. The effects of ozone on seedlings are not generally representative of the effects on mature trees or forest ecosystems. Studying a mature stand of loblolly pines under natural climatic and ozone conditions, it was determined a 27–50% reduction in stem growth, largely attributed to ozone exposure. Studies show strong negative correlations between ozone and radial

growth for white pines. Shaded leaveswere more sensitive than sun-lit leaves to ozone exposure in a mature stand of the shade-tolerant sugar maple. Most comparisons of seedlings vs. mature trees showed greater ozone sensitivity in seedlings,including red spruce, sequoias, and black cherry. Greater ozone sensitivity in seedlings was attributed to larger stomatal conductances in all of these cases. Since leaf area increases more rapidly with age than does transpiration, leaf-specific transpiration rates, and thus stomatal conductances, generally decrease with age. Furthermore, older trees maintain larger hydraulic resistances due to more complex branching and longer vertical distances to the leaves, and this leads to lower leaf water potential and lower stomatal conductances. Studies of red oak, however, showed an enhanced sensitivity to ozone in 30-year-old mature trees vs. twoyear- old seedlings, due to higher stomatal conductances in the older trees [19,28,88]. The larger stomatal conductance in mature red oak might be related to greater demand for carbohydrates [89] or higher concentrations of nitrogen in leaves and fine roots in the mature trees than seedlings. Both of these differences between mature trees and seedlings would imply greater photosynthetic rates in the older trees, leading to higher stomatal conductances. This study points to the difficulties of generalizing the age dependency of tree sensitivity to ozone.

There is also a potential adaptive response to ozone exposure. Studies show that quaking aspen from more ozone polluted areas in theUSA were less sensitive to ozone when exposed to high ozone levels in either greenhouses or different field environments. A similar response to green and white ash seedlings has been shown. These experiments implied that adaptation to high ozone levels occurred. A suggested mechanism was growth reduction leading to shading by faster-growing tolerant clones. The more ozone-sensitive species also tended to have a higher genetic multiplicity and diversity. Indeed, in an early successional plant community, exposure to ozone led to a less complex community structure by affecting competitive interactions among plants. Oz

Increasing CO2 levels in the future might counteract some of the negative effects of ozone on vegetation growth and productivity. Several Aspen FACE experiments were designed to study such interactive effects. In the Aspen FACE study in northern Wisconsin seedlings of aspen, birch, and maple were studied to determine the effects of CO2 (ambient vs. 560 ppm) and O3 (ambient vs. 1.5 _ ambient) together and independently on photosynthesis and growth. It was found that the elevated ozone levels completely offset the growth enhancements from the elevated CO2 concentrations. Aninteractive effect betweenCO2 and ozone might be expected as ozone uptake is reduced by the lower stomatal conductance at elevated CO2. Studies show that ozone reduced height and diameter growth of aspen in both ambient and elevated CO2 environments, but birch growth was reduced only in elevated CO2 (relative to elevated CO2 alone). Similarly, ozone exposure reduced maximum photosynthetic rates in aspen by 20% and 28%, and in birch by 0% and 17%, under ambient and elevated CO2, respectively. Sugar maple experienced no ozone effects until the fourth year of growth in both CO2 environments. These results do not support the hypothesis of reduction in ozone uptake due to stomatal closure at elevated CO2, and indicate a negative interactive effect between CO2 and ozone. Using these data, Kubiske et al. [43] showed that interannual variability of climate mediated most of the

aspen growth response to both CO2 and O3, with the environmental drivers of July radiation and October temperatures enhancing both effects. The SoyFACE experiment at the University of Illinois at Urbana-Champaign has been established to look at the effects of CO2 and ozone on soybean. Slower senescenc from elevated CO2 levels of 550 ppm was offset by accelerated senescence from elevated ozone levels at 23% above ambient levels. Studies have found substantial decreases in above-ground net primary production (NPP) of 11% during 2002 and 23% during 2003 as a result of the increased ozone levels during 2002–2003. However, Christ et al. [13] found no significant ozone effects on crop yield in 2004, which they attributed to a lack of drought stress and lower ambient ozone levels during 2004. This study suggests the importance of climatic conditions to the overall ozone effect. Ozone damage to crops may outweigh any gains resulting from CO2 fertilization. They found yield increases of 15% for soybean under CO2 elevation to _560 ppm, comparable to the reduction in yield due to elevated ozone. Since no factorial analysis includingCO2 and ozone together has yet been performed for a commercially important crop species under free-air conditions, much more experimental work remains to be done, and it must suffice for now to simply compare the magnitudes of the CO2 and ozone effects. An important factor in such a comparison is that the magnitude of ozone damagevaries greatly with crop species; according to studies, maize and rice are much less susceptible to ozone than wheat and soybean. In terms of CO2 fertilization, species is less important than photosynthetic pathway; C4 crops likely have little to gain from elevated CO2 in the absence of water stress, and although estimates of C3 crop gains from CO2 fertilization differ widely and are hotly disputed, they are almost certainly non-negligible. The ozone and CO2 fertilization effects are thus clearly the same order of magnitude, but their relative magnitudes and interactive effects are still highly uncertain and dependent on both species and environmental conditions. Exposure to ozone causes both visible and physiological damage to vegetation. Visible injury is often a metric of ozone damage and may or may not coincide with physiological injury. Physiological injury includes reduced photosynthesis and other damage to plant functions that lead to reduced growth and biomass. A threshold response to ozone results from initial detoxification by plant antioxidants. Because most ozone enters leaves through the stomata, climatic controls on stomatal conductance regulate ozone uptake. Ozone responds to water-stress in complex ways, as lower stomatal conductance can reduce ozone uptake while ozone itself may impair stomatal function and decrease root growth. There is also contradictory evidence on how the ozone effect differs for seedlings vs. mature vegetation, with stomatal controls again playing a dominant role. Competitive interaction in natural environments often leads to a dominance of ozone-tolerant species, reducing the diversity of the community. Although simple regression models of the effects of ozone on vegetation have been developed, processbased models may involve ecosystem-level approaches or physiological approaches that account for diurnal variability. Various ozone metrics include simple doses, threshold indices or effective doses that account for plant detoxification, or flux-based measures that also account for stomatal conductance. Dose-response functions rely on experimental data to relate these measures to ozone response for different species. In this sense, all models ultimately rely on empirical data to determine the sensitivity of photosynthesis or other plant functions to ozone. Because NOx is a key part of ozone production, the coincidence of NOy deposition and surface-

level ozone is a key consideration towards understanding the carbon sequestration effects on natural ecosystems. Our analysis shows that carbon sequestration resulting from NOy deposition can offset the negative effects of ozone exposure on temperate forests. For managed ecosystems such as croplands, however, where there is significant nitrogen fertilization, there is no compensating effect. Reducing atmospheric ozone levels will therefore not likely decrease carbon sequestration of natural forests due to compensating reductions in nitrogen deposition, but will significantly improve future crop yields and carbon sequestration in croplands or other managed ecosystems.

The ozone molecule consists of three oxygen atoms that are bound together (triatomic oxygen, or O3). Unlike the form of oxygen that is a major constituent of air (diatomic oxygen, or O2), ozone is a powerful oxidizing agent. Ozone reacts with some gases, such as nitric oxide or NO, and with some surfaces, such as dust particles, leaves, and biological membranes. These reactions can damage living cells, such as those present in the linings of the human lungs. Exposure has been associated with several adverse health effects, such as aggravation of asthma and decreased lung function.

Ozone was first observed in the Los Angeles area in the 1940s. The ozone that the ARB regulates as an air pollutant is mainly produced close to ground (tropospheric ozone), where people live, exercise, and breathe. A layer of ozone high up in the atmosphere, called stratospheric ozone, reduces the amount of ultraviolet light entering the earth's atmosphere. Without the protection of the stratospheric ozone layer, plant and animal life would be seriously harmed. In this document, 'ozone' refers to tropospheric ozone unless otherwise specified.

Most of the ozone in California's air results from reactions between substances emitted from vehicles, industrial plants, consumer products, and vegetation. These reactions involve volatile organic compounds (VOCs, which the ARB also refers to as reactive organic gases or ROG) and oxides of nitrogen (NOx) in the presence of sunlight. As a photochemical pollutant, ozone is formed only during daylight hours under appropriate conditions, but is destroyed throughout the day and night. Therefore, ozone concentrations vary depending upon both the time of day and the location. Ozone concentrations are higher on hot, sunny, calm days. In metropolitan areas of California, ozone concentrations frequently exceed regulatory standards during the summer.

From the 1950s into the 1970s, California had the highest ozone concentrations in the world, with hourly average concentrations in Los Angeles peaking over 0.5 ppm and frequent "smog alerts". In the early 1970s, the ARB initiated emission control strategies that provided for concurrent and continuing reductions of both NOx and VOC from mobile sources and, in conjunction with the local air districts, stationary and area sources. Since then, peak ozone concentrations have decreased by more than 60 percent and smog alerts no longer occur in the Los Angeles area, despite more than a 35 percent increase in population and almost a doubling in vehicle miles traveled. However, most Californians still live in areas that do not attain the State's health-based standard (0.09 ppm for one hour) for ozone in ambient air.

The formation of ozone in the troposphere is a complex process involving the reactions of hundreds of precursors. The key elements, as summarized in Finlayson-Pitts and Pitts (2000), and in Seinfeld and Pandis (1998), are discussed below.

The formation of ozone in the troposphere results from only one known reaction: addition of atomic oxygen (O) to molecular oxygen (O2) in the presence of a third "body" (M). [M is any "body" with mass, primarily nitrogen or oxygen molecules, but also particles, trace gas molecules, and surfaces of large objects. M absorbs energy from the reaction as heat; without this absorption, the combining of O and O2 into O3 cannot be completed.]

O + O2 + M à O3 + M (1)

The oxygen atoms are produced primarily from photolysis of NO2 by the ultraviolet portion of solar radiation (hn).

NO2 + hn à NO + O (2)

Reaction 3 converts ozone back to oxygen and NO back to NO2, completing the "nitrogen cycle."

O3 + NO à NO2 + O2 (3)

Reactions 1 and 3 are comparatively fast. Therefore, the slower photolysis reaction 2 is usually the rate-limiting reaction for the nitrogen cycle and the reason why ozone is not formed appreciably at night. It is also one of the reasons why ozone concentrations are high during the summer months, when temperatures are high and solar radiation is intense. The cycle time for the three reactions described above is only a few minutes. Ozone accumulates over several hours, depending on emission rates and meteorological conditions. Therefore, the nitrogen cycle operates fast enough to maintain a close approximation to the following photostationary-state equation derived from the above reactions.

[O3]photostationary-state = (k2/k3) x [NO2]/[NO] (the brackets denote concentration)

The ratio of the rate constants for reactions 2 and 3, (k2/k3), is about 1:100. Assuming equilibrium could be reached in the ambient air and assuming typical urban pollution concentrations, a NO2 to NO ratio of 10:1 would be needed to generate about 0.1 ppm of ozone (a violation of the state one-hour ozone standard [0.09 ppm]). In contrast, the NO2 to NO emission ratio is approximately 1:10; therefore, the nitrogen cycle by itself does not generate the high ozone concentrations observed in urban areas. The net effect of the nitrogen cycle is neither to generate nor destroy ozone molecules. Therefore, for ozone to accumulate according to the photostationary-state equation, an additional pathway is needed to convert NO to NO2; one that will not destroy ozone. The photochemical oxidation of VOCs, such as hydrocarbons and aldehydes, provides that pathway.

Hydrocarbons and other VOCs are oxidized in the atmosphere by a series of reactions to form carbon monoxide (CO), carbon dioxide (CO2) and water (H2O). Intermediate steps in this overall oxidation process typically involve cyclic stages driven by hydroxyl radical (OH) attack on the parent hydrocarbon, on partially oxidized intermediate compounds, and on other VOCs. The Hydroxyl radical is ever-present in the ambient air; it is formed by photolysis from ozone in the presence of water vapor, and also from nitrous acid, hydrogen peroxide, and other sources. In the sequence shown below, R can be hydrogen or virtually any organic fragment. The oxidation process usually starts with reaction 4, from OH attack on a hydrocarbon or other VOC:

RH + OH à H2O + R (4)

This is followed by reaction with oxygen in the air to generate the peroxy radical (RO2).

R + O2 + M à RO2 + M (5)

The key reaction in the VOC oxidation cycle is the conversion of NO to NO2. This takes place through the fast radical transfer reaction with NO.

RO2 + NO à NO2 + RO (6)

R can also be generated by photolysis, which usually involves only VOCs with molecules containing the carbonyl (C=O) bond. The simplest VOC molecule that contains the carbonyl bond is formaldehyde (HCHO). Because formaldehyde enters into several types of reactions of importance for understanding ozone formation and removal, we will use it to help illustrate these reactions. The oxidation cycle for formaldehyde can be written in the following sequence of reactions.

OH + HCHO à H2O + HCO (7)

HCO + O2 à HO2 + CO (8)

HO2 + NO à NO2 + OH (9)

Hydroperoxyl radical (HO2) is generated by reaction 8, and the hydroxyl radical (consumed in reaction 7) returns in reaction 9 to complete the cycle. In addition, reaction 9 produces the NO2 required for ozone formation, as described above. Also, the carbon monoxide (CO) generated by reaction 8 can react like an organic molecule to yield another hydroperoxyl radical.

OH + CO à H + CO2 (10)

H + O2 + M à HO2 + M (11)

Another component that formaldehyde provides for smog formation is a source of hydrogen radicals.

$$HCHO + hn \rightarrow H + HCO \qquad (12)$$

The hydrogen atom (H) and formyl radical (HCO) produced by this photolysis reaction yield two hydroperoxyl radicals via reaction with oxygen, as shown in reactions 8 and 11.

The reactions above comprise the simplest VOC oxidation cycle. Actually, hundreds of VOC species participate in thousands of similar reactions.

Another reaction is central to a basic understanding of ozone formation: the NO2 plus radical sink reaction that forms nitric acid.

$$NO2 + OH + M \rightarrow HNO3 + M \qquad (13)$$

The previous discussion can be used to explain the typical pattern of ozone concentrations found in the urban atmosphere. Nitric oxide concentrations are relatively high in the early morning because the free radicals needed to convert the NOx emissions (which are primarily NO) to NO2 are not yet present in sufficient quantities. After sunrise, photolysis of formaldehyde (reaction 12) and other compounds starts the VOC oxidation cycle for the hundreds of organic gases present in the atmosphere. Subsequent NO to NO2 conversion by the peroxy radical (reaction 6) results in NO2 becoming the dominant NOx species. When the NO2 to NO ratio becomes large enough, ozone builds up. In the South Coast Air Basin (Los Angeles area), the highest ozone concentrations are observed in the San Bernardino Mountains, many miles downwind from the highest concentration of emission sources (freeways, power generating facilities, and oil refineries along the coast), because the reactions involving the organic gases are relatively slow. Meanwhile, NO2 concentrations decrease via the sink reaction 13.

Winds disperse and dilute both NOx and ozone. During the day, NOx is also diluted by the diurnal rising of the inversion layer, allowing for more mixing (see section 1.4 for further discussion). For ozone, however, the deepening mixing layer may cause its concentration to decrease on some days and increase on others. Although increased mixing almost always dilutes NOx, the effect of increased mixing on ozone concentrations depends upon whether higher concentrations of ozone are present aloft. Ozone that is trapped above the inversion layer overnight is available to increase the concentrations of ozone generated by the following day's emissions.

During the night, NO and ozone combine to form NO2 and oxygen via reaction 3 until either the NO or ozone is consumed. Nitrous acid or HONO is also present at night in polluted ambient air in California. Nitrous acid is produced from NO2 and water, and is also emitted from various combustion sources. Its levels are low during the day because sunlight breaks it down rapidly. At sunrise, sunlight causes gas-phase HONO to react rapidly to provide NO and OH, two key reactants in the formation of ozone. In this way, they help initiate ozone formation in the morning by being available to react with VOCs as soon as their emissions increase due to an increase in human activity.

Nitric acid (HNO3) was once thought to be a permanent sink for NOx and for radicals. However, nitric acid on surfaces may react with NO to regenerate NO2, which would increase the ozone-forming potential of NOx emissions.

1Although VOCs are necessary to generate high concentrations of ozone, NOx emissions can be the determining factor in the peak ozone concentrations observed in many locations (Chameides, 1992; National Research Council, 1991). VOCs are emitted from both natural and anthropogenic sources. Statewide, natural VOC sources dominate, primarily from vegetation. However, in urban and suburban areas, anthropogenic VOC emissions dominate and, in conjunction with anthropogenic NOx emissions, lead to the peak concentrations of ozone observed in urban areas and areas downwind of major urban areas.

The relative balance of VOCs and NOx at a particular location helps to determine whether the NOx behaves as a net ozone generator or a net ozone inhibitor. When the VOC/ NOx ratio in the ambient air is low (NOx is plentiful relative to VOC), NOx tends to inhibit ozone formation. In such cases, the amount of VOCs tends to limit the amount of ozone formed, and the ozone formation is called "VOC-limited". When the VOC/ NOx ratio is high (VOC is plentiful relative to NOx), NOx tends to generate ozone. In such cases, the amount of NOx tends to limit the amount of ozone formed, and ozone formation is called "NOx -limited". The VOC/ NOx ratio can differ substantially by location and time-of-day within a geographic area. Furthermore, the VOC/ NOx ratio measured near the ground might not represent the ratio that prevails in the air above the ground where most of the tropospheric ozone is generated.

Photochemical reactivity, or reactivity, is a term used in the context of air quality management to describe a VOC's ability to react (participate in photochemical reactions) to form ozone in the atmosphere. Different VOCs react at different rates. The more reactive a VOC, the greater potential it has to form ozone. Examples of the more reactive VOCs in California's atmosphere include propene, *m*-xylene, ethene, and formaldehyde. The ARB has helped to pioneer an approach to ozone control that considers the reactivity of each VOC constituent. In California's urban areas, ozone formation tends to be limited by the availability of VOCs. Therefore, the reactivity-based regulatory approach has been applied in conjunction with reduction of NOx emissions. Reactivity-based regulations promote the control of those VOCs that form ozone most effectively, thereby guiding the affected industries (such as manufacturers of motor vehicle and consumer product formulators that use solvents) to choose the most cost-effective processes and designs to reduce VOC emissions. Further information is available from the ARB website, http://www.arb.ca.gov/research/reactivity/reactivityresearch.htm.

Contributions to background ground-level ozone concentrations include downward mixing of ozone from the stratosphere, and ozone formation due to photochemical reactions of locally emitted natural precursors. Lightning, wildfires, and transport are additional factors.

Although little mixing occurs between the troposphere and stratosphere, stratospheric ozone intrusion occasionally causes localized ozone increases, especially at high mountain locations. Most of this intrusion is due to "tropopause folding", which results from strong storms that draw stratospheric air down into the troposphere. In California, this tends to occur in spring. Because stable, stagnant conditions are necessary to support high ozone concentrations in urban California, this process generally does not contribute significantly to peak ozone concentrations. Stratospheric ozone intrusion is also due to general stratospheric subsidence. On a global basis, California is particularly prone to springtime stratospheric ozone intrusion from this process. However, this process is a relatively minor contributor to surface ozone concentrations in California, especially in the summer when ozone concentrations tend to be highest.

Another process leading to ground-level ozone arises from photochemical reactions involving natural precursors. Plants emit VOCs (see section 1.3), and soil microbes produce NOx that is vented into the air. Small amounts of NOx are also emitted from crops, apparently related to fertilizer application. Natural precursors may react with anthropogenic precursors to produce ozone concentrations that are of ambiguous origin. Where vegetation produces large amounts of VOCs, if anthropogenic NOx is also present, significant amounts of ozone can be produced.

Lightning contributes to the formation of ozone by heating and ionizing the air along the path of the discharge, thus forming the ozone precursor NOx. However, lightning tends to occur when meteorological conditions are not conducive to high ozone concentrations. Wildfires also contribute to ozone formation by producing NOx from combustion, and by distilling VOCs from vegetation. However, wildfires in California are not a major contributor to ozone pollution.

Finally, transport from outside of California contributes to in-state ozone concentrations. Cities in neighboring states and Mexico emit ozone precursors that impact California. In addition, urban plumes can be lofted high enough into the atmosphere to be entrained in global circulation and transported thousands of miles. In particular, ozone due to emissions in Asia, reaches California in springtime. However, this transport is not a major contributor to peak ozone concentrations in California because downward mixing of Asian ozone to the surface is precluded by the strong surface inversion usually present during high ozone episodes. Also, periods of effective long-range transport are generally restricted to spring, while high ozone concentrations due to local sources in California tend to occur in late summer and fall.

California's varied ecosystems interact with emissions related to human activity to influence ozone concentrations. Certain desert species, oaks, and pines emit substantial amounts of highly reactive VOCs, called biogenic emissions. Vegetation can either increase or decrease the ambient ozone concentration as the result of complex processes briefly described below.

Vegetation can reduce ozone concentrations by providing cooling and by removing pollutants. The shade provided by trees lowers ozone concentrations in several ways. It

reduces the pollutant emissions from many sources (such as less evaporation of fuel from cooler parked vehicles). By cooling homes and offices, tree shade lowers emissions associated with electricity generation because less power is needed for air conditioning. In addition, cooling reduces the speed of chemical reactions in ambient air that lead to the formation of ozone.

Vegetation can also enhance the removal of ozone through deposition on plant surfaces. The surfaces of leaves and pine needles allow for deposition of ozone and NO2. Several different factors affect pollutant removal, such as how long a parcel of air is in contact with the leaf, and the total leaf area available for deposition. Also, rain tends to reduce ambient ozone concentrations by washing out atmospheric gases as well as gases deposited on leaves and needles.
Other processes involving vegetation can lead to higher concentrations of ozone. For example, trees and other types of vegetation emit biogenic VOCs, such as isoprene, pinenes, and terpenoid compounds. These biogenic VOCs can react with NOx emitted from sources such as cars and power plants to form ozone. Many biogenic VOCs are highly reactive (i.e., especially efficient in reacting to form ozone); some VOCs are even more efficient in forming ozone than those emitted from cars and power plants. In addition, VOCs can be emitted from decomposing leaves.

To help understand the complex mechanisms by which vegetation influences ambient ozone concentrations, the ARB established a "Biogenic Working Group" (BWG). The BWG has developed vegetation maps, leaf biomass databases, emission factors, and a California-specific "biogenic emissions inventory through geographic information systems" (BEIGIS) that has satisfactorily accounted for observed ambient ozone concentrations. The information developed by the BWG will help the ARB to better model ozone formation, and to better determine the relative importance of VOC and NOx control. Additional information is available from the ARB website, http://www.arb.ca.gov/research/ecosys/biogenic/biogenic.htm.

In the troposphere, the air is usually warmest near the ground. Warm air has a tendency to rise and cold air to sink, causing the air to mix, which disperses ground-level pollutants. However, if cooler air gets layered beneath warm air, no mixing occurs -- the air is stable or stagnant. The region in which temperature is so inverted is called an inversion layer. One type of inversion occurs frequently several thousand feet above the ground and limits the vertical dispersion of pollutants during the daytime. Another type of inversion occurs on most evenings very near the ground and limits the vertical dispersion of pollutants to a few hundred feet during the night. Pollutants released within an inversion tend to get trapped there. When the top of the daytime inversion is especially low [in elevation], people can be exposed to high ozone concentrations. Mountain chains, such as those downwind of California's coastal cities and the Central Valley, help to trap air and enhance the air quality impact of inversions. Cooler air draining into the state's valleys and 'air basins' also enhances inversion formation.

The direction and strength of the wind also affect ozone concentrations. Based on worldwide climate patterns, western coasts at California's latitude tend to have high-

pressure areas over them, especially in summer. By preventing the formation of storms, and by promoting the sinking of very warm air, these high-pressure areas are associated with light winds and temperature inversions, both of which limit dispersion of pollutants.

Because tropospheric ozone forms as a result of reactions involving other pollutants, the highest concentrations tend to occur in the afternoon. The photochemical reactions that create ozone generally require a few hours (see section 1.1) after the emissions of substantial VOC emissions, and are most effective when sunlight is intense and air temperatures are warm. Ozone concentrations in California are usually highest in the summer. The prevailing daytime winds in summer are on-shore, bringing relatively clean air from over the ocean to the immediate coastal areas, but carrying emissions of ozone precursors further inland. With the climatically favored clear skies and temperature inversions that limit the vertical dispersion of pollutants, these emissions are converted into ozone, with the highest concentrations tending to occur at distances a few tens of miles downwind of urban centers (ARB 2002).

During the periods of the year when the sunlight is most intense, much of California experiences a high frequency of inversions, relatively low inversion heights, and low wind and rainfall. As a result, no other State has more days per year with such a high potential for unhealthy ozone concentrations.

Ambient ozone concentrations can vary from non-detectable near combustion sources, where nitric oxide (NO) is emitted into the air, to several hundreds parts per billion (ppb) of air in areas downwind of VOC and NOx emissions. In continental areas far removed from direct anthropogenic effects, ozone concentrations are generally 20 - 40 ppb. In rural areas downwind of urban centers, ozone concentrations are higher, typically 50 - 80 ppb, but occasionally 100 - 200 ppb. In urban and suburban areas, ozone concentrations can be high (well over 100 ppb), but peak for at most a few hours before deposition and reaction with NO emissions cause ozone concentrations to decline (Finlayson- Pitts and Pitts 2000, Seinfeld and Pandis 1998, Chameides et al. 1992, Smith et al. 1997). Ozone concentrations vary in complex ways due to its photochemical formation, its rapid destruction by NO, and the effects of differing VOC/ NOx ratios in air. A high ratio of NOx emissions to VOC emissions usually causes peak ozone concentrations to be higher and minimum concentrations to be lower, compared to background conditions. Peak ozone concentrations are usually highest downwind from urban centers. Light winds carry ozone from urban centers, and photochemical reactions create ozone from urban emissions of VOC and NOx. Also, away from sources of NOx emissions, less NO is available to destroy ozone. Due to the time needed for transport, these peak ozone concentrations in downwind areas tend to occur later in the day compared to peak ozone concentrations in urban areas.

Due to the lack of ozone-destroying NO, ozone in rural areas tends to persist at night, rather than declining to the low concentrations (<30 ppb) typical in urban areas and areas downwind of major urban areas, that have plenty of fresh NO emissions. Ratios of peak ozone to average ozone concentrations are typically highest in urban areas and lowest in

remote areas (ARB 2002). Within the ground-based inversions that usually persist through the night, ozone concentrations can be very low. In urban areas, emissions of NO near the ground commonly reduce ozone below 30 ppb. In rural areas, however, NO emissions are less prevalent and nighttime ozone may persist well above 30 ppb.

Ambient ozone concentrations tend to vary temporally in phase with human activity patterns, magnifying the resulting adverse health and welfare effects. Ambient ozone concentrations increase during the day when formation rates exceed destruction rates, and decline at night when formation processes are inactive. This diurnal variation in ozone depends on location, with the peaks being very high for relatively brief periods of time (an hour or two duration) in urban areas, and being low with relatively little diurnal variation in remote regions. In urban areas, peak ozone concentrations typically occur in the early afternoon, shortly after solar noon when the sun's rays are most intense, but persist into the later afternoon, particularly where transport is involved. Thus, the peak urban ozone period of the day can correspond with the time of day when people, especially children, tend to be active outdoors.

In addition to varying during the day, ozone concentrations vary during the week. In the 1960s, the highest ozone concentrations at many urban monitoring sites tended to occur on Thursdays. This pattern was believed to be due to the carryover of ozone and ozone precursors from one day to the next, resulting in an accumulation of ozone during the workweek. In the 1980s, the highest ozone concentrations at many sites tended to occur on Saturdays and the "ozone weekend effect" became a topic of discussion. Since then, the weekend effect has become prevalent at more urban monitoring locations and the peak ozone day of the week has shifted to Sunday. Although ozone concentrations have declined on all days of the week in response to emission controls, they have declined faster on weekdays than on weekends. Thus, the peak ozone period of the week now tends to coincide with the weekend, when more people tend to be outdoors and active than during the week.

The causes of the ozone weekend effect and its implications regarding ozone control strategies have not yet been resolved. Almost all of the available data represent conditions at ground level, where the destruction of ozone by fresh emissions of NO is a major factor controlling ozone concentration. However, most ozone is formed aloft, and the air quality models used to analyze ozone formation have not demonstrated the ability to represent the ozone-forming system aloft with sufficient realism. In addition, several potentially significant photochemical processes are yet to be fully incorporated in simulation models. These deficiencies leave unresolved this fundamental question: does the ozone weekend effect occur because more ozone is formed (aloft) on weekend, because more ozone is destroyed (at the surface) on weekdays, or because ozone formation is more efficient on weekends? More information may be obtained from the ARB website, http://www.arb.ca.gov/aqd/weekendeffect/weekendeffect.htm .

Ozone concentrations also vary seasonally. Ozone concentrations tend to be highest during the summer and early fall months. In areas where the coastal marine layer (cool, moist air) is prevalent during summer, the peak ozone season tends to be in the early fall.

Additionally, as air pollution controls have reduced the emissions of ozone precursors and the reactivity of VOCs, ozone concentrations have declined faster during times of the year when temperatures and the amount of sunlight are less than during the summer. Thus, the peak ozone season corresponds with the period of the year when people tend to be most active outdoors.

Also, ozone concentrations can vary from year to year in response to meteorological conditions such as El Niño and other variations in global pressure systems that promote more or less dispersion of emissions than typical. Although peak ozone concentrations vary on a year-to-year basis, peak ozone concentrations in southern California have been declining on a long-term basis, as anthropogenic emissions of VOC and NOx have declined. However, since the advent of the industrial revolution, global background concentrations of ozone appear to be increasing (Finlayson-Pitts and Pitts, 2000). This increase has implications regarding the oxidative capability of the atmosphere and potentially global warming processes (ozone is a strong greenhouse gas but is present at relatively low concentrations). Further discussion of these topics is beyond the scope of this document.

Tropospheric ozone (O3) was first determined to be phytotoxic to grapes in southern California in the 1950s. Investigations followed that showed O3 to be the cause of foliar symptoms on tobacco and eastern white pine. In the 1960s, ''X'' disease of ponderosa pines within the San Bernardino Mountains was likewise determined to be due to O3. Nearly 50 years of research have followed. Foliar O3 symptoms have been verified under controlled chamber conditions. Studies have demonstrated negative growth effects on forest tree seedlings due to seasonlong O3 exposures, but due to complex interactions within forest stands, evidence of similar losses within mature tree canopies remains elusive. Investigations on tree growth, O3 flux, and stand productivity are being conducted along natural O3 gradients and in open-air exposure systems to better understand O3 effects on forest ecosystems. Given projected trends in demographics, economic output and climate, O3 impacts on US forests will continue and are likely to increase Two mysterious diseases of conifers, ''X'' disease of ponderosa pine (Pinus ponderosa) in southern California and eastern white pine (Pinus strobus) needle blight were linked to O3 in the 1960s . A flurry of research triggered by this pioneering research confirmed early results linking O3 to these two diseases for western conifers and eastern white pine The link of adverse effects of O3 beyond visible symptoms and reduced growth to whole ecosystem change was made by Stark et al. (1968) who demonstrated that O3 predisposed trees to mortality-causing insects and by Dr Paul Miller and his colleagues who showed that O3 differentially affected the survival of various tree species thus resulting in community change. This early research paved the way for the next 50 years of research on O3 effects on the forests of southern California, led by the USFS Pacific Southwest Research Station (Dr Paul Miller) and Statewide Air Pollution Research Center at University of California, Riverside (Dr O.C. Taylor). Simultaneously, in the eastern US major research programs to examine the impacts of O3 on forest trees were begun at The Pennsylvania State University (Dr Al Wood), the Boyce Thompson Institute (Dr Len Weinstein and Dr Jay Jacobson), and the USFS Northeastern Forest Experiment Station in Delaware (Dr Leon Dochinger). Smaller programs were initiated

at universities and state and federal agencies throughout the eastern United States. These programs flourished in the 1970s during the early EPA research mandate to establish air quality guidelines for O3 and again in the 1980s during the NAPAP Program where researchers examined possible links between acid rain and O3 impacts. Beginning in the 1990s, the Forest Response Program of the US Forest Service also provided a boost to O3 research on forest trees across the US. This program later became part of the current US Forest Ponderosa pine, a widely distributed western conifer ranging from northern Mexico, northward to the Canadian Rocky Mountains, and east to the Black Hills of South Dakota and western Oklahoma, is also sensitive to O3. The first detection of O3-induced foliar symptoms on ponderosa pine was made in southern California. Ponderosa pines growing in the San Bernardino Mountains, which are downwind of the Los Angeles Air Basin, were particularly affected. Studies of O3-induced effects on ponderosa pine seedlings suggest that long-term O3 exposure can have significant effects on photosynthetic capacity. Negative carry-over effects of O3 on root growth and carbohydrate concentrations of ponderosa pine seedlings have been found in subsequent growing seasons. Furthermore, it is well documented that O3-stressed ponderosa pines in the San Bernardino Mountains suffer from subsequent attack by bark beetles, leading to mortality. This long-term case study has provided compelling evidence for the important role of O3 in predisposing trees to other biotic or abiotic stressors concluded that changes in depth and vigor of root systems, shifts in C pool sizes and C allocation patterns, and changes in supply rates of N and Ca, caused by O3 and acidic deposition (singly or in combination), represent key shifts in ecological function in diverse forest types across large geographic areas in North America. Differential mortality of O3-sensitive species, such as ponderosa pine and Jeffrey pine, has been implicated as one of the mechanisms leading to shifts in species composition and community structure in O3-stressed western pine forests. As with eastern white pine, there may be selection occurring for O3 tolerance within these two western conifers, although it has not been proven that actual changes in gene frequency have occurred.Decreasing maximum hourly O3 concentrations in the San Bernardino Mountains during 1963 to 1999 suggest that the rigorous air quality standards of southern California are having a positive impact on O3 maxima in the region. However, these areas still receive relatively high concentrations of O3; in addition, they also are subjected to high amounts of N deposition ,which may confound the O3 responses Given that availability of light, water and nutrients are all affected by competition, and that O3 effects interact with all three of these factors, it is not surprising that competition between trees can have a dramatic effect on how trees respond to O3. Since the vast majority of O3 studies have been done with little or no competition (i.e. with a small number of trees in chambers), it is difficult to scale results from O3 effects in open-grown tree experiments to the forest situation where strong competitive interactions affect environmental conditions, carbon allocation patterns, and pest susceptibility. Competition from understory vegetation can also impact community responses to.

5.6. Insect and disease pests Interactions between O3 and insect and disease pests are complex and highly variable. The first reported O3/pest interaction of forest trees was predisposition of western pines by O3 to attack by bark beetles in southern California. This bark beetle/O3 interaction was later found to be a very complex one including

drought and N deposition In feeding preference studies, gypsy moth larvae have shown a preference to feed on O3-exposed oak seedlings and beetles have preferred O3-exposed eastern cottonwood foliage. These interactions with insects likely result from O3-induced changes in foliar chemistry or from O3 impacts on parasitoid populations. Altered performance of forest tree pathogens can also be induced by elevated O3. Increased susceptibility of hybrid poplar to Septoria canker was demonstrated by Woodbury et al. (1994). Similarly, increased susceptibility to Melampsora leaf rust has been shown in trembling aspen trees exposed to elevated O . 5.7. Other pollutants It was apparent in the early O3 research that the effects of co-occurring pollutants such as SO2 could increase visible symptoms caused by O3. Later, more complex studies showed that interacting pollutants could increase, decrease, or not affect growth responses for trees exposed to elevated O3. The influx of air pollution research related to the National Atmospheric Deposition Program (NAPAP) resulted in a large number of papers published in the decade from 1985 to 1995. However, the most realistic of these studies dealt with interacting O3 and acidic deposition at high altitudes, or where fog cooccurred with elevated O3. In these situations the effects of O3 may be difficult to distinguish from those of acidic deposition. For example, the pine forests in the southern Sierra Nevada Mountains of California are now known to have long been exposed to both elevated O3 and acidic deposition). Similarly, high elevation spruce-fir forests of the Northeast are frequently exposed to elevated O3 and acidic precipitation which may be affecting cold tolerance of these forests. 5.8. Rising atmospheric CO2 Since pre-industrial times, the concentrations of atmospheric CO2 and O3 have increased by over 30%. These two co-occurring pollutants are quite interesting as they act in diametrically different directions with regard to forest tree growth and productivity. While O3 generally adversely affects forest trees, elevated CO2 generally enhances growth and productivity, albeit these relationships vary by species, soil nutrition and age of the forest. While several authors report that elevated atmospheric CO2 generally ameliorates the effects of O3 on photosynthesis and growth, negative interactions of these two pollutants have also been reported One likely outcome of the future is that increasing levels ofambient O3 will likely diminish the potential of forest treesto sequester additional CO2 under rising atmospheric CO2.

Inhalation of airborne particulate matter (PM) derived from urban traffic is associated with pathology in the arteries, heart, and lung; effects on brain are also indicated, but are less documented. Free radicals were detected by electron paramagnetic resonance (EPR) in the nPM 30 days after initial collection. Chronic inhalation of re-aerosolized nPM altered selected neuronal and glial activities in mice. The neuronal glutamate receptor GluA1 was decreased in hippocampus, while glia were activated and inflammatory cytokines) in cerebral cortex. Twoα, TNFαinduced (IL-1 *in vitro* models showed effects of nPM suspensions within 24-48 hr of exposure that involved glutamatergic functions. In hippocampal slice cultures, nPM increased the neurotoxicity of NMDA, a glutamatergic agonist, which was in turn blocked by the NMDA antagonist AP5. In embryonic neuron cultures, nPM impaired neurite outgrowth, also blocked by AP5. Induction in mixed glia cultures required higher nPMα and TNFαof IL-1 concentrations than for neuronal effects. Because conditioned media from nPM-exposed glia also

impaired outgrowth of embryonic neurites, nPM can act indirectly, as well as directly, on neurons *in vitro*. nPM can affect embryonic and adult neurons through glutamatergic mechanisms. The interactions of nPM with glutamatergic neuronal functions suggest that cerebral ischemia, which involves glutamatergic excitotoxicity, could be exacerbated by nPM.

Sudden oak death is a new disease affecting tanoak (*Lithocarpus densiflora*) and oaks (*Quercus* spp) in California and Oregon, caused by the recently described pathogen *Phytophthora ramorum*. It has reached epidemic proportions in several counties in central California, leading to the death of tens of thousands of trees. In addition to oaks and tanoak, *P ramorum* has been found in nearly all woody plant species in mixed evergreen

and redwood forests from central California to southern Oregon. Plant species that are not killed appear to serve as a reservoir for the pathogen. The high susceptibility of tanoak to infection and death suggests that *P ramorum* is an exotic pathogen, but its origins, and most details of its biology and ecology, remain unknown. Our limited knowledge onlyOver the past century, a number of plant diseases have had major impacts on forest ecosystems around the world. Classic examples include chestnut blight in North America, caused by *Cryphonectria parasitica*, and jarrah dieback in western Australia, caused by *Phytophthora cinnamomi* (Anagnostakis 1987; Weste and Marks 1987). Some exotic diseases, such as chestnut blight and white pine blisterust, have severely impacted populations of a single plant species, leading to a cascade of changes in forest ecosystemsIn fewer cases, a pathogen with a broad host range has affected forest ecosystems directly. Since it was introduced in the 1920s, *P cinnamomi* has virtually eliminated most tree species over hundreds of thousands of hectares of the jarrah (*Eucalyptus marginata*) forests of western Australia, converting them to grassland or shrubland (Weste and Marks 1987; Erwin and Robiero 1996). The emergence and introduction of new plant diseases continues to this dayOne of the most recent examples of an emerging forest disease is "sudden oak death". The symptoms that define it were first recognized during 1994–95, and over the next few years it reached epidemic proportions in oak forests along approximately 300 km of the central California coast (Garbelotto *et al.* 2001). The most visibly affected hosts included tanoak (*Lithocarpus densiflora*), coast live oak (*Quercus agrifolia*), California black oak (*Quercus kellogii*), and Shreve's oak (*Quercus parvula var shrevei*) (Rizzo *et al.* 2002a). Eventually it was shown that the pathogen *Phytophthora ramorum*, recently described from rhododendron (*Rhododendron* spp) and viburnum (*Viburnum* spp) in Europe (Werres *et al* 2001; Rizzo *et al.* 2002a), was causing the disease. Research soon revealed that *P ramorum* could infect other plant species as well. Over the past year and a half, over 20 additional species from 12 plant families have been identified as potential hosts (Rizzo *et al.* 2002b; Garbelotto *et al.* 2003; Table 1). Additional hosts are likely to be found, as many other plant species are susceptible to infection under laboratory conditions (Hansen and Sutton 2002; Linderman *et al.* 2002; Parke *et al.* 2002; Tooley and Englander 2002). What is sudden oak death, and what are the ecological implications of this new disease? Here we review what is known about the biology, ecological implications, and management of *P ramorum* in the coastal forests of California and Oregon.

Across the range of hosts, we can distinguish two different diseases caused by *P ramorum*: lethal branch or stem infections, and non-lethal foliar and twig infections The pathogen causes large cankers on the main stem of oaks and tanoak, and often kills the tree (Figure 1). The name "sudden oak death" comes from the fact that large groupsof infected oaks and tanoaks often appear to die rapidly, with their foliage turning brown within several weeks. However, the time from initial infection to tree death can range from many months to several years. Controlled inoculation studies suggest that environmental factors and host genotype will affect the length of the overall process, and there are many observations of trees in which disease lesions are still small after a few years. Tanoak appears to be the most susceptible species. All size classes of tanoak, from seedlings to mature trees, may be infected and killed (Rizzo *et al.* 2002a; Figure 2). Tanoak infections occur on stems, branches, and leaves. In contrast, *P ramorum* does not appear to infect small stems, branches, or leaves on true oaks; larger trees therefore appear to be more prone to infection and mortality than seedlings and saplings. A number of opportunistic organisms are commonly observed on oak and tanoak trees with advanced *P ramorum* infections, including ambrosia beetles (*Monarthrum scutellare* and *Monarthrum dentiger*), bark beetles (*Pseudopityophthorus pubipennis*), and *Hypoxylon thouarsianum*, a sapwood rotting fungus, (McPherson *et al.* 2002). These organisms may hasten the death of trees infected with *P ramorum*. Researchers have found that only oaks in the sections Lobatae (red oaks) and Protobalanus (intermediate oaks) are infected in the field. Despite the wide host range of *P ramorum*, oaks in the section Quercus (the white oaks) still appear to be unaffected by *P ramorum* in the field (Rizzo *et al.* 2002a, 2002b). Blue oak (*Q douglasii*) and valley oak (*Q lobata*) – the major oak species of the inner coastal ranges, central valley, and Sierra Nevada foothills of California – fall into the white oak group, as does Oregon white oak (*Q garryana*) and Engelmann oak (*Q engelmannii*) (Pavlik *et al.* 1991). The progression of the disease and the extent of damage to most non-oak hosts are not well characterized yet. One of the few consistent features of *P ramorum* infections is that the pathogen is only recovered from aboveground plant parts such as leaves, branches, or stems. On several species in the rhododendron family (Ericaceae), *P ramorum* causes considerable leaf blight and branch dieback (Figure 3). One researcher has observed the death of madrone (*Arbutus menziesii*) saplings in less than 4 months in the field (P Maloney unpublished), and we suspect that the pathogen can kill mature madrone trees. Mature native rhododendrons have been killed in Oregon (Goheen *et al.* 2002a), and dieback has also been noted on redwood (*Sequoia sempervirens*) sprouts and Douglas-fir (*Pseudotsuga menziesii*) saplings (Davidson *et al.* 2002a; Maloney *et al.* 2002). However, on other hosts, such as California bay laurel (*Umbellularia californica*) and bigleaf maple (*Acer macrophyllum*), *P ramorum* appears to be primarily a leaf pathogen with very limited stem infection. Although they do not lead directly to tree death, these foliar infections may influence tree physiology through such effects as premature leaf abscission.

Phytophthora ramorum is known from two main geographic locations: the western US and Europe. (See the website www.suddenoakdeath.org for the most up-to-date

range.) In the US, the disease is found on oaks from the Big Sur coastline in Monterey County, California to Curry County, Oregon, a distance of approximately 650 km (Figure 4). Most sites where *P ramorum* has been collected are within 30 km of the Pacific coastline or San Francisco Bay. The most extensive areas of tree mortality in California are in the canyons of Big Sur, the hills above the city of Santa Cruz, and in Marin County north of San Francisco, especially around Mt Tamalpais.
In 1993, the pathogen was recovered in dead and dying ornamental rhododendron and viburnum in gardens and nurseries in Germany and the Netherlands (Werres *et al.* 2001; Werres and Marwitz 1997). It has since been confirmed from nurseries and gardens in the UK, Spain, Poland, France, Sweden, and Belgium. Although surveys are ongoing, *P ramorum* has not been found to infect native plants in those countries (C Brasier pers comm). To date, no mortality of overstory trees in Europe has been associated with *P ramorum*.

Phytophthora ramorum's geographic origin is unknown. There are no reports of this species in the US or Europe before the mid 1990s. Its aggressiveness on tanoaks of all ages, and its limited geographic range in relation to the distribution of its hosts, suggest that it may have been introduced only recently to the US. Based on amplifiedfragment length polymorphisms (AFLPs), *P ramorum* appears to have a clonal population structure, with one dominant genotype which has been found from Big Sur, California to Oregon (Garbelotto *et al.* 2002a; K Ivors and M Garbelotto unpublished). This population structure also supports the hypothesis of an exotic origin. The pathogen's origin in Europe is also unknown, but AFLP analyses suggest that the European and North American populations are distinct (Ivors and Garbelotto unpublished). In addition, all European isolates of *P ramorum* tested to date appear to have an A1 mating type, while all North American isolates have the A2 type (Werres and Zielke in press). These data suggest that the microorganism was not exchanged between the two continents. If it is indeed exotic in both locations, then we hypothesize that it was transported from a third, unknown location. We cannot completely dismiss the hypothesis that *P ramorum* has been in California for many years, and that changes in the environment, such as climate warming, fire suppression, or other modifications in land use patterns, have led to an increase in its aggressiveness and the prevalence of a single genotype. Another hypothesis is that a native *Phytophthora* species underwent a change in host specificity, host preference, or virulence. *Phytophthora* hybrids occur in nature, and may show a marked change in host range (Brasier *et al.* 1999). In England and other parts of Europe, a new *Phytophthora* species that appears to be a hybrid between *P cambivora* (an oak pathogen) and *P fragariae*-like isolates (a strawberry pathogen) has killed thousands of alder trees (*Alnus* spp) (Brasier *et al.* 1999).
Phytophthora can infect alder. Many *Phytophthora* species occur in agricultural and ornamental settings in California, so a hybrid origin for *P ramorum* is possible.

Over its range in coastal California and Oregon, *P ramorum* is associated with several different forest types, found at elevations ranging from sea level to over 800 m (Rizzo

et al. 2002a; Figures 5 and 6). Oaks and tanoak occur in closed-canopy, mixed evergreen forests that can be divided into those with and those without a substantial component of Douglas-fir (Shuford and Timossi 1989; Sawyer *et al.* 1988). Other major hardwood associates in these mixed evergreen forests include California bay laurel and madrone. In coast redwood forests, an understory of tanoak mixes with a number of shrub species, including rhododendron and evergreen huckleberry (*Vaccinium ovatum*) (Shuford and Timossi 1989). Nearly all of the woody plant species in these forest types are known to be susceptible to *P ramorum*. The evidence collected to date suggests that *P ramorum*

Sudden oak death endangers forests DM Rizzo and M Garbelotto epidemics in California forests may be driven by the presence of associated susceptible plant species, not the oaks themselves. In this sense, *P ramorum* acts like a zoonotic disease, such as bubonic plague or Lyme disease, in which humans serve as dead-end hosts (Keeling and Gilligan 2000; Woolhouse *et al.* 2001). Foliar infections of non-oak hosts may play a key role in the epidemiology of *P ramorum* by serving as a source of inoculum (Davidson *et al.* 2002c). The most likely dispersal propagules of *P ramorum*, sporangia and chlamydospores, are readily produced on foliage, particularly bay laurel (Figure 7), but we have yet to find these propagules on infected oak bark (Davidson *et al.* 2002c). Even hosts with relatively small lesions may be important in the transmission biology of *P ramorum*, because such lesions do not kill leaves, and may support the abundant production and release of spores (sporulation). Forests with a diversity of plant hosts may therefore be more susceptible to invasion by *P ramorum*. Two recent studies in California have found a clear association between the presence of bay laurel trees and *P ramorum* infection on oak (Kelly and Meentemeyer 2002; Swiecki and Bernhardt 2002). Ongoing surveys have found that foliar host infection may precede the infection of oak and tanoak on individual sites. Because tanoak leaves may be infected and potentially support sporulation, epidemics in tanoak forests may be different from those in coast live oak forests, in not requiring the presence of additional hosts. As with most plant diseases, environmental conditions will play a major role in the spread and intensification of sudden oak death. The current geographic range of the pathogen in California and Oregon includes a wide range of microclimates within a climate of predominantly winter rainfall. The mean annual rainfall of the different locations where *P ramorum* has been collected ranges from 85 to 200 cm. Our recent field data indicate that warm rains result in very high levels of sporulation (Davidson *et al.* 2002c; J Davidson and P Maloney unpublished). Inoculation experiments on bay laurel leaves have indicated 9–12 hours of leaf wetness and temperatures of ~18–22°C are necessary to obtain significant infection (Garbelotto *et al.* 2003). We hypothesize that heavy rains during several years in the mid-1990s, including the El Niño periods of 1993 and 1998, resulted in widespread infection and increased mortality of oaks 2 to 3 years later. Little is known about how variation in site conditions might predispose hosts to infection or influence the severity of a local epidemic. Many stand level variables, such as stand density, basal area, slope, and aspect, do not appear to be good predictors of the presence of the pathogen (Swiecki and Bernhardt 2002), but canopy exposure and edge effects do seem to be associated with increased infection (Swiecki and Bernhardt 2002; Kelly and Meentemeyer 2002), which may reflect an increased interception of inoculum in wind-driven rain. A significant positive correlation between stem water potential and diseased

oaks suggests that sudden oak death is not more common on water-stressed oaks, and that water stress may not be as important a factor as it is with many other plant diseases (Swiecki and Bernhardt 2002). Genetic resistance in host populations will also affect spread of the disease. Preliminary field and laboratory experiments have indicated that individual coast live oak and bay laurel plants display different levels of susceptibility to the disease (Rizzo *et al.* 2002a; Garbelotto *et al.* 2003). Further studies have been initiated to follow up on these observations in both species (R Dodd and Garbelotto unpublished; D Hüberli and M Garbelotto unpublished). If resistance is found to occur, determining its distribution among host populations may allow us to develop predictive epidemiological models.

Many studies to evaluate the short- and long-term impacts of *P ramorum* on coastal forests are currently underway. To do this, we need to understand the ecology of these forests, including the expected rates and causes of mortality. Coastal range forests consist of a mosaic of vegetation types in various successional states (Sawyer *et al.* 1988; Shuford and Timossi 1989). Humans have been altering much of the forestland currently affected by the pathogen for many years already (Barbour *et al.* 1993; Pavlik *et al.* 1991; Sawyer *et al.* 1988; Keeley 2002). Fire suppression, human-ignited fires, introduced plant and animal species, and logging have shaped the forest structure and composition. The dynamics of many of these forests are poorly understood, even in the absence of *P ramorum*. On small spatial scales (0.2–1 ha), infection rates of *P ramorum* range from 20–70% for tanoak and 4–30% for coast live oak (Swiecki and Bernhardt 2002; P Maloney unpublished; J Davidson unpublished). Mortality measured in 2000–01 reached up to 22% for tanoak and 15% for coast live oak (Swiecki and Bernhardt 2002). Unfortunately, mortality rates of oaks and tanoak under historic conditions have not been well characterized for these forests (Swiecki and Bernhardt 2002; Hunter 1997). Swiecki and Bernhardt (2002) have recently compared mortality associated with other diseases (mostly canker rot fungi) to those caused by *P ramorum*. They concluded that the pathogen has doubled the mortality of coast live oak on their plots and increased the amount of tanoak mortality at least fourfold over the past decade.

The distribution of *P ramorum*-caused mortality across the landscape has not been well quantified, but it is clearly patchy (Kelly and Meentemeyer 2002; Swiecki and Bernhardt 2002). Even within the areas with the greatest amount of tree mortality, there are large areas with susceptible host species that are apparently free of disease. Clustering of dead and diseased trees has been found on scales of 100–300 m (Kelly and Meentemeyer 2002; Swiecki and Bernhardt 2002). Extensive aerial andground surveys are currently underway to gain a better understanding of mortality levels across the pathogen's complete geographic range (Kelly and McPherson 2001).
The broad host range of *P ramorum*, the variability of symptoms between different hosts, and the pathogen's aerial dispersal suggest that it has the potential to cause a cascade of long-term landscape changes. Hosts include canopy trees, understory shrubs, and at least one herbaceous plant. Sublethal infections of non-oak hosts may allow *P ramorum* to persist indefinitely in infested forests, alter the regeneration of infected species, and affect the success of future restoration efforts. Because of the range ofsusceptibility of co

existing plant species (for example, bay laurel and oak), pathogen-mediated competition may influence future successional patterns in these forests (Hudson and Greenman 1998). Selection pressure driven by resistance to *P ramorum* may also be large enough to cause a directional shift in the genetic structure of oaks and tanoaks. Even in the case of the foliar hosts, the pathogen's subtle effects on plant physiology may result in a selection force.

Coastal oak and tanoak forests provide food and shelter for hundreds of vertebrate and invertebrate species (Pavlik *et al.* 1991), so the diseases caused by *P ramorum* have the potential to affect wildlife by changing or completely removing these resources. For example, reductions in insect populations associated with oaks and other hosts could affect insectivorous birds, by changing prey type or increasing foraging time and ultimately affecting nesting success. Reductions of acorn production by oaks and tanoaks could influence vertebrate populations that rely heavily on acorn mast as a food source. Research is currently underway by several research groups to test these possibilities (D Dahlsten and K Fischer pers comm). Microbial community dynamics may also be affected. In many redwood forests, tanoaks are the dominant (or only) species with ectomycorrhizal fungi on their roots. If tanoak is removed from a site as a result of disease, does this eliminate or reduce these mycorrhizal species, or will mycorrhizal communities shift to other host species (eg ericaceous plants)? How will future plant generations be affected if significant mycorrhizal changes occur? As a leaf pathogen, *P ramorum* interacts with other foliar fungi species. Other foliar *Phytophthora* species are present, some of which appear to be native (Rizzo *et al.* 2002a; Davidson *et al.* 2002b). Does *P ramorum* directly compete with these other species? If so, will it replace them in areas where they coexist? A similar instance of one pathogen causing the local extinction of a related but less aggressive pathogen occupying the same ecological niche has been documented for the two causal agents of Dutch elm disease (Brasier 2001). Given the apparently identical niches of these *Phytophthora* species, what is the potential for hybridization and horizontal gene transfer? Could this lead to the formation of unique, and potentially more virulent, genotypes? Of great concern is the potential for the spread of *P ramorum* to forests outside California and Oregon. Laboratory inoculations have found two eastern North American oaks, northern red oak (*Quercus rubra*) and pin oak (*Quercus palustris*), to be susceptible to *P ramorum* infection (Rizzo *et al.* 2002b). One must be cautious when extrapolating results from seedling experiments to potential effects on mature trees. However, because lesion sizes in red oak and pin oak seedlings were much larger than in coast live oak seedlings (a species in which adults are very it is probable that mature trees of northern red oak and pin oak will also be susceptible to *P ramorum* infection. *Rhododendron catawbiense*, native to the eastern US, has been infected by *P ramorum* in nurseries and gardens in Germany (Werres *et al.* 2001). Because of our limited knowledge of the ecology of *P ramorum*, the ultimate impact of this pathogen in new regions is difficult to predict. Critical parameters to examine will include microclimate and the interactions between carrier hosts and those hosts that may die from the pathogen.

California, Oregon, and the federal government have established task forces to bring to together various agencies in developing strategies and methodologies to manage

this new disease. Many researchers at universities, NGOs, and government agencies in both the US and Europe are involved in learning more about *P ramorum* and its ecological ramifications . Management of the pathogen is occurring at multiple scales, ranging from protecting individual trees to preventing the spread of the pathogen to other geographic locations. Various chemical compounds are being tested to protect high-value, individual oak trees at the urban–wildland interface (Garbelotto *et al.* 2002b). The combined use of chemical compounds and natural resistance in oaks may eventually have broader application on the landscape scale (Garelotto *et al.* 2003; Hardy *et al.* 2001). However, landscape-level control of most forest diseases includes a silvicultural approach that incorporates knowledge of pathogen and host ecology. An understanding of pathogen spread, forest succession, and the role of fire in host ecology will be necessary to develop management protocols in California and Oregon. In addition, management goals will depend on forest type and geographic location. Researchers and government agencies in Oregon are attempting an eradication program (Goheen *et al.* 2002b), which was established after the disease was found to be concentrated in nine small patches (5–40 diseased trees each) scattered over 23 km2 and located over 300 km from the nearest known infection sites in California. Even if the complete local eradication of *P ramorum* in Oregon is unsuccessful, the effort may slow the spread of the pathogen to new locations in the state. In most areas of California, in contrast, the disease is too well established to be eliminated. In the forests around the San Francisco Bay, where timber production is not a major goal, management of the disease will be geared towards watershed management, fuel loads, wildlife, and aesthetics.
On the northern coast of California, leading into Oregon, the disease occurs in areas that are currently managed for timber. In these forests, plans to combat *P ramorum* will need to be incorporated into already established forest management plans, for example through quarantine inspections, or washing vehicles in work areas to prevent the movement of infested soil. Prevention of the spread of *P ramorum* to areas outside the known zone of infestation is considered a high priority. This requires coordination between government agencies, private industries, and the public. Because of the uncertainty concerning the origin, distribution, and host range of *P ramorum*, the US, Canada, the EU, Australia, and South Korea have implemented quarantines for plant material and/or soil from California and Oregon. In addition, The US has placed restrictions on rhododendron and viburnum imported from Europe, since the pathogen has clearly moved throughout western Europe on infected rhododendron and viburnum stock. Stopping the exchange of potentially infected plant material between Europe and the US is critical, because of the possibility of uniting the two mating types of *P ramorum*, leading to increased genetic variability. Such a situation occurred recently with *Phytophthora infestans*, cause of potato late blight, with devastating results (Fry and Goodwin 1997). The discovery that even small foliar lesions may be epidemiologically important for *P ramorum*, combined with the difficulties of culturing the pathogen, is proving to be a challenge for regulatory and monitoring agencies.We must also keep this epidemic in context. Thousandsof hectares of California oak woodland are already lost each year to urbanization and agriculture (Pavlik *et al.* 1991).

Pathologists investigating the widespread death of oak trees in the forest ecosystems of northern California concluded, in 2000, that the problem was due to a new plant disease,

dubbed Sudden Oak Death (SOD), which was caused by the fungal pathogen *Phytophthora ramorum*. Since then this one organism has been the focal point of notable efforts to understand, monitor, and control SOD. While not disputing that *P. ramorum* is involved in the final demise of many oaks, there are a growing number of scientists and arborists who do not agree that this pathogen is the fundamental cause of the overall decline. These experts point out that most of the dying oaks in SOD-affected forests show no expression of *P. ramorum*. They further note that the etiology of SOD closely resembles that seen in other aging forests where the decline of the trees has been attributed to an increase in acidity and mineral deficiency of the water and soils. In these places, acidic conditions create mineral imbalances and deficiencies in trees, especially calcium, which greatly weaken the trees, raising their susceptibility to secondary pests and pathogens. Here we present evidence that suggests systemic acidification of forests can explain, quite well, the entire SOD phenomenon. The etiology of SOD in California coincides closely with the symptoms of systemic acidification in aging forest ecosystems. Dieback starts with the upper and outer branches in the crown, showing a pattern of wilting and browning of leaves along with dead small branches and progressively spreading to the lower parts of the crown over several years.The decline affects nearly all kinds of oaks, as well as bays, buckeyes, pines, and so forth, hitting mainly the larger trees in mixed-oak savannas and forests, most of which have been under strict fire control for more than 50 years. Areas near the coast and those experiencing frequent seasonal fog are especially hard hit by SOD. Affected trees tend to occur in mature forests (greater than 100 years old) and are always found in association with a heavy cover of mosses and lichens. Moss mats have been shown in both laboratory and field studies to create conditions acidic enough to kill the underlying fine roots and mycorrhizae, whichleads to water and nutrient stress and reduced radial growth in nearby trees. Mosses and lichens are also observed to degrade the tree's protective bark layer, allowing for pests/pathogens to more easily infest/infect the tree. In general, the etiology of SOD in California is much like that seen elsewhere in dying oaks (e.g., Texas, Missouri, Pennsylvania, Manitoba, and Europe), except that *P. ramorum* is not found to be involved in these other declines. Data on pH from 34,700 soil samples taken from a wide range of agricultural and forest soils in California indicate that between 10.2 and 21.5% of the soils are acidic ($pH < 6.0$) and 1.6 to 4.3% are strongly acidic ($pH < 5.0$). However, a set of samples taken from SOD affected sites indicates that 72% of these soils are acidic and 4% are strongly acidic (median $pH = 5.7$; $n = 136$). The soils from these sites were also found to be consistently low in Ca and very high in soluble Al and Fe. Spatial analysis reveals a strong coastal gradient in soil pH with the lowest pH values found near the coast. Strong coastal gradients are also apparent in soil Ca, which is lowest near the coast, and in soil Al, which is highest near the coast. Precipitation chemistry data from this region also reveal a coastal pH gradient much like that found in the soils. Similar coastal gradients in precipitation pH have been reported from the Olympic peninsula, from southeast Alaska, and from Scandinavia. These results lend further support to the theory that systemic acidification is adversely affecting the health of the trees and soils in SOD-affected forests. The situation described here in California is not unlike that in other regions of the world where aging forests are experiencing decline. From this and other work (e.g., studies at Hubbard Brook), we strongly believe that the cause (and the definition) of SOD

is still an open question, and that the scope of SOD research should be expanded to include studies of acidification by cryptogams in the context of forest and soil ecology.

Sudden Oak Death (SOD), defined by COMTF scientists as the decline and death of trees caused by the fungal pathogen *Phytophthora ramorum*, is widespread across the coastal forests of northern California. The pathogen has now been found in over 40 species of California plants and in nursery plants around the US. While the current research is focused on the genetics, transmission, and epidemiology of the *Phytophthora ramorum* (*P. r.*) pathogen, information on the ecology related to SOD is sorely lacking. From an ecosystem perspective the partial or complete death of a tree indicates not only a dysfunction or disease affecting that organism, it signifies, as well, a change or shift in the composition and metabolism of the whole forest ecosystem1. In the case of SOD, such an approach seems especially pertinent given that the Lead PI (Dr. Lee Klinger) and others2 have observed that most of the trees dying in SOD-affected forests show no visible expression of the *P. r.* pathogen. The presence of secondary pests like Ambrosia beetles in SOD-affected forests raises the possibility that *P. r.*, too, may be secondary, that there are other agents acting to weaken the trees and increase susceptibility to fungal attack. Clearly, any credible information which implicates factors other than *P. r.* in SOD must be carefully investigated. This paper investigates the regional patterns in soils and precipitation chemistry data from California as related to the role of systemic acidification in SOD.

In studies of ecosystem change, ecologists have frequently reported how maturing landscapes and seascapes progress through a series of characteristic communities, stages of development much like those of individual organisms*3*. Successional (*i.e.* developmental) studies of forested landscapes have shown that as forests mature and age the vegetation takes on more evergreen forms, mosses and lichens increase in abundance, and surface soils become more acidic*4*. This process of *systemic acidification* is due, in part, to the buildup of biomass (mainly plant organic matter) which, upon decomposition, releases organic acids that acidify and leach mineral nutrients from the soils. Older forests that escape burning or otherwise go undisturbed for several generations will eventually show symptoms of decline (*e.g.*, top dieback, reduced rates of radial growth (Kreuter 1993 in Huettl & Mueller Dombois 1993), fine root mortality). In the early 70s scientists in the US and Europe started to pay attention to observations of rapid dieback in certain forests that previously appeared healthy. As these forests were often within a few hundred kilometers of highly industrialized regions, air pollution and acid rain were implicated as probable culprits. Billions of dollars of US and European government funds were poured into research on the affects of acid rain and air pollution on trees. Well before the studies were complete the popular press picked up on the acid rain issue and soon had the public convinced that forest decline around the world was attributable to acid rain or air pollution. But upon completion of these major research programs, forest scientists concluded, still unbeknownst to the general public, that acid rain and air pollution are *not* the primary causes of forest decline5. Some reasons for this are obvious. Forest decline with symptomology identical to that found in polluted regions occurs extensively inunpolluted areas such as Alaska6, Hawaii7, New Zealand8, the southern Andes9, Borneo10, and New Guinea11. This pattern alone suggests the involvement of

natural processes of tree death, which may be exacerbated by high pollution levels. Most work on possible natural causes of forest decline centers on biotic damaging agents such as insects and fungal pathogens, and on the damaging effects of climate. Little work has been done on community and ecosystem processes related to forest decline, especially with respect to succession12. In general, hypotheses and investigations of forest decline have focused on patterns and
processes occurring over a rather narrow range of spatial and temporal scales. For instance, there are virtually hundreds of studies on the short-term (≤ 1 year) effects of various pollutants on leaves and branches (and occasionally entire individuals) of trees and crops plants. Yet, few, if any studies address the predicted or observed ecosystem- or global-scale patterns of forest decline occurring presently or over the past few centuries. "Decline" or "dieback" are terms used synonymously to describe forests where the majority of trees show reduced vigor or are standing dead13. In some forests the obvious causal mechanisms of fire, wind, or flooding, can explain the death of trees. However, in many areas forest dieback cannot be "explained" by these or other mechanisms. Insects, fungal pathogens, mistletoe, or other forest pests are often, but not always, present in declining forests. Forest decline is a global phenomenon14 that has been occurring sporadically for at least several hundred years in many areas15. Forest decline tends to occur in moist to wet sites, though not always16, and there is growing evidence that tree death can be droughtinduced17. In some areas tree death occurs in groups18, but more often mortality is scattered throughout an affected forest in a seemingly random pattern19. Forest decline affects mainly mature or old-growth forests, and tends to affect canopy trees more severely than subcanopy trees20. Yet, growing within heavily-damaged forests are some canopy trees which are barely, if at all, affected21. Seedling and sapling growth in damaged areas may or may not be strongly inhibited22. Death of surrounding understory is rarely observed23. Affected trees tend to exhibit dieback beginning at the top or outermost branches and progressing downward or inward24. Decreased diameter growth is commonly associated with forest decline25, as are symptoms of nutrient deficiencies (e.g., chlorosis) and waterstress26. In studies where belowground plant tissue has been examined, mortality of very fine (feeder) roots and mycorrhizae has also been documented27. Of particular importance is the observation that feeder root and mycorrhizae mortality occurs prior to the onset of aboveground dieback symptoms28. The decline is often, though not always, accompanied by attacks of pathogenic fungi and/or insects. Surface soils in declining forests are typically found to be acidic*29*, depleted in base cations*30*, and enriched in soluble Fe and Al*31*. A recent set of field studies focusing on the role of mosses in forest decline have reported a significant relationship between the presence of ground-dwelling mosses and the mortality of fine (feeder) roots and mycorrhizae in the soils beneath declining forests of southeast Alaska, New York, and Colorado*32*. These studies follow off of earlier findings from Venezuela documented highly significant decreases in the radial growth of trees and highly significant increases in the acidity of soils with an increase in moss cover. Other studies have found that the mortality of feeder roots and mycorrhizae occurs prior to the onset of aboveground symptoms*33*. Fine root mortality in areas of forest decline is closely tied to soil acidification*34*, especially where calcium levels are low*35*. Soluble aluminum concentrations are reported to be high in the organic soil horizons and in the soil water beneath declining trees*36*. The fine roots of declining trees are found to contain

significantly more Al than those of healthy trees*37*. Controlled laboratory experiments show a significant inverse correlation between soil Al and the live root biomass in oaks*38*. Strong acidification and high concentrations of soluble Al in soil water are reported to inhibit the growth of endomycorrhizal fungi*39*. It is important to note that these soil conditions have been clearly documented in declining oak forests around the U.S.*40*. In summary, the evidence indicates
that organic acids released by mosses and other cryptogams leach the surface soils of base locations and mobilize heavy metals (especially Al) to toxic levels*41*, thus killing the fine roots and mycorrhizal fungi, interfering with the Ca and Mg uptake and transport*42*, and slowing the cambial growth of trees*43*. Given the heavy Ca requirements of trees for maintaining healthy wood and bark, Ca deficiency ranks high on the list of concerns of forest scientists. Furthermore, the acids produced by mosses are notorious for their ability to accelerate the weathering of substrates, including bark and even rock. It is likely, therefore, that mosses growing thickly on the trunks and branches of certain trees are degrading the trees' protective bark and creating points of entry for pathogens, insects, and other pests into the stem Following the early phases of forest decline which occurs in the subtle presence of mosses, the later phases are clearly associated with peat-forming mosses, especially *Sphagnum*. The significant role of peat formation in forest decline has long been recognized by ecologists who have labelled the process *paludification*. The term paludification was first used by Auer to refer to the establishment and growth of peat-forming plant communities taking place both on dry lands and in bodies of water44. In recent years this term has been applied exclusively to the succession from dry land to bog, and the term "terrestrialization" has been applied to the process of bog formation from the infilling of a water body. Numerous physical mechanisms for paludification have been proposed including rising water tables45, reduced thawing depth46, and soil hardpan formation47. Extensive paludification in the British Isles and Scandanavia has been attributed to forest depradation by early humans48. Paludification has also been attributed to biological mechanisms such as the growth of peatforming vegetation49 and beaver activity50. Typically treated merely as indicators, *Sphagnum* and other peat-forming mosses appear to play much more an active role in paludification than previously believed. This can be clearly seen in the phenomena known as "wave dieback". I first saw this phenomena in Peril Straits which separates Baranof and Chichagof Islands in southeast Alaska, where circular and elliptical rings of dieback appear within the old-growth forests. These rings may be anywhere from several meters to thousands of meters in circumference and are expanding outward. Dead trees, fallen logs, and large stumps abound within the rings, whereas in the forests outside the rings there is noticably less dieback. In the narrow zone of dieback forming the rings there is an abundance of *Sphagnum* mosses, and if one observes the very edge of the ring, the line between mostly healthy forest and dying forest, one finds a virtual *Sphagnum* wave moving along, slow but steady. The wave-like progression of forest dieback has been seen in many places51. On Mt. Mitchell in North Carolina, the highest mountain in the Appalachians, the wave dieback of red spruce near the summit is associated with waves of *Polytrichum* mosses. On Whiteface Mountian in the Adirondack Mountains of upstate New York, the dieback of balsam fir occurs in elongated waves which move upslope at rates of about a half meter to a meter per year. At the margin are billowing mats of *Sphagnum* transforming the ecosystem into a mossy heathland. Here, and elsewhere, the pattern can be best

understood if the site is visited during the brief period in spring when all but the deepest snows have melted. Sites around and under late-lying snowbanks are preferred habitats for mosses. These snowbanks provide a steady source of moisture and nutrients which extends well into the spring when sunshine is strong and air temperatures are warm. Mosses which begin growing immediately upon thawing, are able to take immediate advantage of this optimal environment, while vascular plants must await the thawing of subsoils and the growth of new leaves in order to take full advantage of this short-lived springtime condition. Thus, the waves of mosses demark shifting lines of deep snowbanks which form every winter and melt away every spring. The acids produced by mosses are also notorious for their ability to accelerate the weathering of substrates, including bark and rock. This raises the question of whether the thick moss cover on the trunks and branches of SOD-infected trees is degrading the protective bark layer and creating points of entry for *P. r.* and other pathogens into the stem. Mosses clearly must be considered and studied if they are present in areas of tree decline. Furthermore, the tests for pathogenicity of *P. r.* must include controls for mosses before any claims can be made that *P. r.* is the ultimate cause of SOD. While the SOD pathogen ranges across the coastal forests of Northern California, its expression follows a general pattern whereby cankers occur mainly at the base of the older canopy trees in mixed-oak forests in moist valleys and on hillsides, especially where fog is frequent. Affected trees tend to occur in forests greater than 100 years old and with a heavy cover of mosses52. The entire region has been under strict fire control for more than 50 years. Increasingly strongly acidic soils have been noted in Sonoma, Marin, Mendocino, and Lake Counties53. A coastal to inland gradient of increasing precipitation *p*H, as has been observed elsewhere along the north Pacific coast54, is also apparent here in northern California55. The decline patterns and environment of this region are comparable to those of many other forests around the world affected by decline56.

The role of Phytophthora species in forest decline has attracted much attention recently in both California and Europe. While not disputing that Phytophthora may have a significant role in accelerating the demise of some trees there are obviously tree losses that cannot be attributed to this pathogen. In fact other root-nibbling organisms such as Pythium have also been implicated in some European forest decline situations57. The Sudden Oak Death situation in California is different in that there is supposedly no function for Phytophthora ramorum as a root pathogen. Sudden oak death is attributable primarily to above groundsymptoms, especially trunk cankers. However it is likely that there is a soil phase in the disease cycle of this pathogen since it produces abundant chlamydospores potentially capable of long-term survival and germinability. In addition, many oaks from which Phytophthora has not been isolated are in decline. The root health of oaks is deserving of much closer attention. Are 'root nibblers' such as Pythium, or indeed Phytophthora at work? What is the status and health of mycorrhizal associations in roots in these affected areas? I believe there are likely to be other associated factors in forest decline, especially environmental degradation (impact of sulfur dioxide, nitrogen dioxide, acid rain, ozone, water quality, increased carbon dioxide levels, global warming, droughts, floods) that can reduce the resistance of the forest to pest and pathogen attack. It is also possible that some of the death we are seeing is attributable to the natural cycle of death and renewal in the forest. One specific example in a plethora of complex

interactions is deserving of some attention. The prolonged absence of natural burning and the likely consequent excessive depletion of nutrients from the soil such as calcium might be expected to be a significant factor in disturbance of this natural cycle. There is a voluminous literature of the different effects of calcium, both direct on oak decline58 and indirect on the biology and pathology of Phytophthora in naturally suppressive and calcium carbonate amended soils59. The concept of new Phytophthora species could be misleading since likely many, if not all, have been in place for decades60, some perhaps for thousands of years. The recent ability to use molecular methods to rapidly and accurately identify microbes such as Phytophthora has created the illusion that these pathogens are recently introduced and on the increase. In fact even in the case of SOD the extremely close similarity with a root pathogen Phytophthora lateralis which has been recorded in the Pacific region forests since 1920 suggests the possibility that it has been in the region for many decades. I favor the concept developed by Erwin Fuhrer61 and others62 in describing the oak decline situation in Central Europe. He describes oak decline as a 'complex of diseases'. No one set of stress factors nor one pathogen can accurately describe the situation. Fuhrer emphasizes a 'complex of diseases' with a 'combination of predisposing and inciting factors' dependent on the geographical location and conditions. Not surprisingly, success in treating forest decline has been widely achieved using methods such as liming and burning which ameliorate soil acidity and cryptogam cover. Burning and liming produce similar results as they both reduce the sources of acidity (by killing the cryptogams) and raise the base cation concentration in the surface soils*63*. The traditional practice of applying limewash to the trunks of trees (*i.e.*, whitewashing) has long been known to improve tree health and reduce insect pests and mosses growing on the bark. Limewashing is still a common practice in many traditional forest cultures around the world (*e.g.*, in Mexico, China, and India). The large volume of studies on lime treatments of declining forests together indicate that that addition of lime-rich minerals clearly improves the health of trees*64*, improves root and mycorrhizae growth*65*, improves soil fertility*66*, reduces levels of toxic metals in soils*67*, and reduces moss cover*68*. In short, remineralization appears to slow or arrest the aging process in ecosystems. decline is associated with systemic acidification. These findings are similar to those found in southeast Alaska where forest decline has been incorrectly attributed to the *Phytophthora* pathogen76 . . . Given these results and considering, as well, other evidence that systemic acidification isassociated with forest decline in California, an expanded view and definition of SOD is warranted.

Air pollution in our cities, and even our suburbs, is a serious concern as we enter the twenty first century. The burning of fossil fuels has introduced a steady flow of deadly pollutants into our atmosphere, yet very few urban areas can meet national clean air standards. Luckily, we are surrounded by efficient air cleaning machines□trees. Trees sequester many pollutants from the atmosphere, including nitrogen dioxide (NO2), sulfur dioxide (SO2), ozone (O3), carbon monoxide (CO), and particulate matter of ten microns or less (PM10).

Dave Nowak, Ph.D., of the USDA Forest Service conducted research in 50 US cities and developed a methodology to assess the air pollution removal capacity of urban forests with respect to the above pollutants. American Forests uses this research to determine the

work trees do to clean the air with CITYgreen software□a desktop GIS program that calculates the value of trees to urban environments. The program estimates the amount of pollution being deposited within a given study site based on pollution data from the nearest city then estimates the removal rate based on the area of tree and/or forest canopy coverage on the site.

Air Quality benefits are reported both in lbs removed per year, as well as annual dollar savings. Dollar values for pollutants are based on the median value of the externality costs set by the Public Service Commission in each state.

Trees and Air Quality around the Country

City	Pounds of pollutants removed annually by trees	Annual value of trees with respect to air pollution
Washington, DC	878,000	$2.1 million
Atlanta, GA Metro Area	19,000,000	$47 million
Portland, OR Metro Area	2,000,000	$4.8 million
Denver, CO Metro Area	1,100,000	$2.6 million

An average human breathes around 3,400 gallons of air each day. Included in each breath can be numerous noxious chemicals as well as suspended particles. Consequently, human lungs must cope with this pollution. It is well known that air pollution is hazardous to human health and of enormous concern today. However, the "lungs" of our urban areas, trees growing in and around our cities, must also contend with air pollution. Just as air pollution impacts humans, air pollution affects trees in a variety of ways. Pollution has long been identified as harmful to trees. Historically, impacts of air pollution were primarily local in scale (trees impacted by a nearby industrial area).Yet today, trees are being affected on both the local and regional scale. Entire urban areas and even rural area trees are experiencing adverse impacts of air pollution. Trees help cleanse the air byreducing levels of carbon dioxide (CO2) and removing pollutants, while releasing oxygen through photosynthesis. Air pollution directly injures trees by damaging living tissue, primarily foliage, and impairs photosynthesis and the ability to respirate. Air pollutants also weaken trees, predisposing them to further damage by insects and disease. Some air pollutants can also indirectly impact tree health by altering ecosystem processes such as soil chemistry and nutrient cycling. The result is decreased tree vigor and growth that can culminate in tree death.

Air pollution may cause short-term damage, which can be immediately visible, and long-term damage, which can lead to gradual tree decline. Signs of tree injury from air pollution generally appear first in the foliage. Leaves or needles may begin to appear discolored, spots may occur between the veins or the tips may appear burned. Air pollution injury is often difficult to identify because symptoms are similar to other injuries such as nutritional deficiencies and drought. Additionally, long-term damage generally
Ozone damage to maple.

Ozone damage to black cherry.
predisposes a tree to other environmental stresses, making diagnosis difficult due to the masking effects of the additionalstress. Some tree species are more susceptible to air pollution than are others.

Some of the major air pollutants and their primary sources are:
• Carbon dioxide: Burning oil, coal or natural gas for energy.
• Sulfur dioxide: Burning coal to generate electricity.
• Hydrogen fluoride and silicon tetrafluoride: Aluminum and phosphate fertilizer production, oil refineries and steel manufacturing.
• Nitrogen oxides (NOx): Burning fossil fuels and automobile exhausts.
• Ozone: Chemical reactions of sunlight, NOx and volatile organic compounds (occurs naturally and found in products such as paints, solvents, gasoline, adhesive and others)
• Methane: Burning fossil fuels, livestock waste or landfills.
• Chloroflorocarbons: Air conditioners, refrigerators or industrial foam.
• Particulates: Dust, ash, pollen and smoke.
The major phytotoxic (detrimental to plants) air pollutants are ozone, sulfur dioxide and nitrogen oxides.

Ozone is not generally emitted directly into the air; instead, ozone (O3) is formed through a chemical reaction in the Earth's lower atmosphere, the troposphere.
Volatile organic compounds (VOCs) react with nitrogen oxides (NOx) in the presence of heat and sunlight to create ground-level ozone. Ground-level ozone is damaging to human and plant health and is the major component of smog. A few major sources of NOx and VOCs are motor vehicle exhaust, industrial emissions, gasoline vapors and chemical solvents. Ozone enters the tree through stomatal openings on the leaf. Ozone then reacts with leaf tissues to inhibit photosynthetic processes. The amount of ozone entering the tree will depend on the ozone concentrations in the area. Unfortunately, metropolitan areas and the mountains of East Tennessee experience some of the highest concentrations of ground-level ozone. On deciduous trees, a common symptom of ozone stress is purple speckling on upper surfaces of leaves. On coniferous trees, symptoms include yellow mottling on needles, shorter needles and loss of needles. Other general visible symptoms on both hardwoods and pines include chlorosis (yellowing) and premature leaf-drop. While damage from high concentrations of ozone does not commonly kill trees (although it can), it is an additional stress on the health of trees. Ozone also disrupts carbohydrate transport to the leaves. This increases the concentration of sugars in the leaves and makes the foliage more susceptible to insect attack.

In addition to being a component of ground-level ozone, nitrogen oxides, along with sulfur dioxide, are the primary causes of acid deposition or "acid rain." Sulfur dioxides are produced primarily by the burning of coal and oil to generate electricity, from smelting ore that contains sulfurand in the manufacturing of sulfur-based products. Much like ozone, acid rain rarely kills a tree. Instead, acid rain weakens the tree by damaging leaves and limiting the uptake of nutrients. At lower pH levels (more acid soil) the majority of macronutrients become unavailable for tree growth. Acid rain facilitates the leaching of beneficial nutrients from the soil and at the same time increases the release of substances such as aluminum that are more toxic to trees and plants. (Refer to UT Extension publication SP 534 on *Nutrient Deficiencies in Trees* for more information.)

Therefore, the effect is a "one-two punch"

The Arroyo Toad is a relatively small (2-3 inches snout-vent length) frog. Its coloration ranges from olive green or gray to light brown. It can be distinguished from other toads by non-paired, symmetrical dorsal blotches, bicolored parotid glands that are dark posteriorly and light anteriorly as well as a light spot on the sacral humps. A prominent white "v-shaped" stripe crosses the top of the head between the eyes. It lacks a middorsal stripe. The belly is buff-white and often lacks spots. Locomotion is generally in the form of hopping as opposed to walking or taking large jumps.

Tadpoles are difficult to distinguish from those of the Western Toad immediately after hatching, but changes in coloration, size and shape are apparent several weeks later. At hatching, the tadpoles of both species are small and black. Later, the Arroyo Toad tadpoles become tan as opposed to the darker color of the Western Toad larvae. The tadpoles are also more fusiform in shape as opposed to the globose shape of the Western Toad tadpoles. Western Toad tadpoles are communal, occurring in aggregates whereas Arroyo Toad tadpoles distribute themselves evenly within the pools they inhabit. After metamorphosis, toadlets appear as miniature adults with the exception of having yellow spots.

The Arroyo Toad inhabits coastal southern California from Salinas River Basin in Monterey and San Luis Obispo Counties to Arroyo San Simón in northern Baja California, México. It has been reported from Arroyo Grande near El Rosario based on a call; however this needs further confirmation.

This toad prefers riparian habitats with sandy streambeds with cottonwood, sycamore, and willow trees. Some populations occur in streams within coniferous forests. The stream setting usually has adjacent shallow pools where the toad may sit in the water while partially exposed above.

These toads are most active during late winter and early spring after seasonal rains. Early in their activity season, toads forage to prepare for breeding. Later, males disperse along the margins of streams and initiate calling to attract females. Little is known about their

habits outside of their breeding season. It is known that toads will disperse as much as a kilometer from their stream sites in the nonbreeding season.

This toad is chiefly nocturnal. Several life history characteristics make it unique among most toads: eggs are laid at calling sites of males, tadpoles are cryptically colored, non-toxic, and solitary, and juveniles disperse after the wet season ends.

Breeding is accomplished through the process of amplexus where the male grabs the female from behind. After a female chooses a calling male, she will be grasped beneath the armpits by the male. Through this stimulation, the female will lay her strings of eggs into the water. It may take a few days before the female is ready to lay her eggs, so the male has to hang on until she does. At the same time when the eggs are laid, the male will fertilize them. The entire process occurs in the open water. Eggs are laid from March to July, but this depends on sufficient weather conditions and annual rainfall. Breeding season maybe extended in exceptionally wet years. Eggs are small, dark, and laid in strings along the edges of pools with mild current velocities. Tadpoles develop over an extended period of 65-85 days. The lengthy larval period makes them extremely susceptible to mortality during this time.

Arroyo Toad call is a long trill lasting 4-10 seconds that is roughly similar to some insect calls.

Tadpoles are eaten by water bugs, garter snakes, bullfrogs, and a number of fish species. Toadlets and adults are attacked by killdeer, herons, garter snakes, and bullfrogs. It is also reasonable to conclude that turtles, raccoons, opossums, and ravens would prey upon them.

Federally listed as an endangered species, the Arroyo Toad is fully protected by the U.S. Fish and Wildlife Service and California Department of Fish and Game. The Arroyo Toad was listed as an endangered species on December 16, 1994 (U.S. Fish and Wildlife Service, 1994). The main cause of decline for this species in the United States is the loss of habitat. This loss has been attributed to urbanization, agriculture, and dam construction within the toad's preferred habitat (U.S. Fish and Wildlife Service, 1999). Little is known of the status of populations from northwestern Baja California.

In response to a lawsuit brought by the Center for Biological Diversity, the U.S. Fish and Wildlife Service today proposed just over 109,000 acres of protected critical habitat for the endangered arroyo toad in Santa Barbara, Ventura, Los Angeles, San Bernardino, Riverside, Orange, and San Diego counties, California.

"Once a common species in Southern California, the arroyo toad has lost 75 percent of its historic range and needs all of the protected habitat it can get if it is going to survive," said Noah Greenwald, endangered species program director with the Center for Biological Diversity. "Today's proposal represents a hop in the right direction."

This is the third critical habitat designation for the toad since its listing as endangered in 1994. Fish and Wildlife Service proposed designation of 478,400 acres of critical habitat in June 2000, which was pared down to 182,360 acres in January 2001. In response to an industry lawsuit, the agency then proposed to designate 138,713 acres in April 2004 and finalized the decision with just 11,695 acres in April 2005, a reduction of 98 percent. Today's proposed designation restores many of the acres removed due to political interference by the Bush administration.

"The Bush administration did its utmost to ensure that endangered species like the arroyo toad received as little protection as possible," said Greenwald. "Today's proposal is part of the long process of cleaning up the mess created by the past administration."

The severe reduction in the past designation of critical habitat was in part engineered by Julie MacDonald, a disgraced former official who was forced to resign after the Department of the Interior's own inspector general issued a scathing report detailing her interference with, and bullying of, agency scientists. Overall, the Center for Biological Diversity has sued to overturn Bush-era decisions covering 52 species, including a number of other Southern California species, including the California red-legged frog, California tiger salamander, and Santa Ana sucker. To date, the Obama administration has been settling the majority of these suits by agreeing to reconsider decisions that limited protection for endangered species.

Pasadena based conservation organization, Spirit of the Sage Council, has announced that the group reached a mutual settlement agreement with the City of Pasadena over the disputed amount of permanently protected habitat needed for the Arroyo Seco. The City and the nonprofit Sage Council have been at odds for over a decade on the proposed Arroyo Seco Master Plan. The City's plan included the entire 1,000 + acre length of the Arroyo Seco watershed and the Rose Bowl region. Sage Council filed a lawsuit against the City on May 14, 2003.

The lawsuit contended that increased commercial and recreational uses from the Angeles National Forest/Oak Grove Park areas in the north, to the southern area of the City of South Pasadena and Rose Bowl areas, that "the Environmental Impact Report, prepared by the City of Pasadena lacked adequate environmental analysis and specific conservation measures that were needed or otherwise required by law," said Craig Sherman, attorney for the Sage Council.

According to the terms of the settlement, the City at a minimum must permanently conserve one acre of habitat for every one acre impacted by the various Master Plan projects. The upper east side of the Arroyo, known also by the lands indigenous name, "Hahamongna," will remain substantially undeveloped and designated as a "Natural Area." The existing Johnson Field will not be expanded and the periphery will be revegetated. The existing Frisbee Disc Golf area at Oak Grove Park will be relocated further south so as to lessen or eliminate negative impacts to the heritage oaks habitat and to provide revegetation. Prior to the relocation of the disc golf course, and any new impacts to other sensitive habitats throughout the entire Arroyo Seco, the City has

agreed to consult with state and federal permitting agencies to ensure that there is adequate conservation of habitats and any endangered animal or plant species.

"The Arroyo Seco watershed sustains a vast amount of biodiversity." States Leeona Klippstein, executive director of Spirit of the Sage Council. "Over 300 known plant and animal species, including several threatened and endangered, truly need all the habitat that can be protected -- from the golden eagle to the southwestern arroyo toad. Migratory birds, such as the southwestern willow flycatcher and least bells vireo desperately need the riparian mule fat vegetation, especially since the wildfires have occurred throughout the San Gabriel and San Bernardino mountain foothills. It is not an easy job to revegetate sage scrub, riparian and other alluvial habitat types. There has been little success according to expert botanists with government agencies. Knowing that the City of Pasadena will have to go through consultation with public trust agencies such as California Department of Fish and Game and U.S. Fish and Wildlife Service and receive their approval, Sage Council believes this was a very important aspect of the settlement requirements." Said Klippstein
In order for the Sage Council to get greater conservation measures for the Arroyo Seco, the group agreed not to file any additional lawsuits pertaining to the Arroyo Seco Master Plan, including the Rose Bowl, other than monitoring the terms of the settlement and ensuring that the federal and state agencies carry our their oversight obligations

Ozone (O3), a reactive component of air pollution, depresses feeding and voluntary locomotor behavior in laboratory rodents, but the effects of O3 on amphibian behavior are not known. We evaluated the effects of 4 h of exposure to air or ozone (0.6 _l/L), on two ecologically relevant behaviors of the toad *Bufo marinus*. Toads were offered five mealworms at 1, 24, and 48 h after exposure. One hour after exposure, O3-exposed toads ate fewer mealworms than did air-exposed toads (Fisher exact test, *p* 0.005). Within 24 h after exposure, all toads ate four or five mealworms. Because movement is a key component of toad feeding behavior, we tested additional toads (*n* _ 25) for voluntary locomotor behavior during three 1-h trials in a 2.9-m2 open-field arena. Mean (_ standard deviation) total distance moved was: pre-exposure, 29 _ 19.5 m; 1-h postexposure, 13 _ 15.6 m; and 24-h postexposure, 17 _ 17.4 m. The means were not statistically different by repeated measures analysis of covariance. Therefore, our results suggest that a single 4-h exposure to O3 depresses toad feeding behavior after exposure but had little effect on voluntary locomotor behavior.

Declines of many amphibian populations over the past two decades have received significant attention from biologists, in part because amphibians are viewed as monitors or sentinels of pollution and other anthropogenic changes to the environment. In addition to habitat destruction and alteration, local population declines and extirpations of some amphibian populations have been attributed to a variety of herbicides
and pesticides now found pervasively in the environment. One unique characteristic shared by these studies is the switch from lethal to ecologically relevant doses and exposures and a focus on the effects of these chemicals on life history traits, or on aspects of immune function], rather than morbidity or growth morphological defects. Links between pesticide or herbicide exposures and impaired organismal locomotor

performance or behavior of amphibians in laboratory settings have also been establish. An important conclusion from these studies is that pesticide or herbicide effects on behavior can be demonstrated at levels within limits considered safe for human exposure . Soil, water, or air pollution that adversely affects behavior is of particular concern if the behaviors are associated with components of evolutionary fitness (e.g., alterations in feeding behavior or mate acquisition) and, as such, would constitute an ecologically important indicator. The importance of wildlife as potential indicators of environmental health is well recognized for watersheds but is more problematic for air quality (compared with dose and exposure data for epidemiological studies in humans). Although a flurry of research activity in the 1970s and 1980s was concerned with windborne contamination by organic contaminants or via mechanisms of acidification and, recently, the effects of air pollution via mechanisms that affect global warming, no study that we are aware of looked fordirect effects of the oxidative components of air pollution on terrestrial amphibians. Ozone (O3) is a common air pollutant in many urban settings, and, consequently, in adjacent wildlife habitats, O3 levels can frequently exceed U.S. federally recommended levels (1-h standard on 0.12 _l/L, or 8-h standard of 0.08 _l/L). It is a highly reactive gas that can be elevated at ground levels by a chemical reaction between oxides of nitrogen and volatile organic compounds in the presence of sunlight. Ozone peroxidizes animal and human lung tissues and is linked to a suite of health effects. Laboratory studies also indicate that acute (short-term, single exposure) and chronic (long-term, multiple exposures) O3 exposure affects behaviors of animals, although specific mechanisms are generally not known. Laboratory rodents exposed to O3 exhibit pronounced alterations in exploratory behavior, water maze performance, voluntary activity in running wheels , and feeding or drinking behavior. Amphibians, and toads in particular, might be excellent indicators of air pollution. Compared with mammals and other endotherms, a much greater portion of the respiratory surface of a toad can be exposed to O3 and other airborne pollutants because significant gas exchange occurs across the skin of many amphibians. Previously, we demonstrated that O3 alters physiological processes in both reptiles and amphibians. In the marine toad *Bufomarinus*, we demonstrated reduced immune function (reduced pulmonary macrophage phagocytosis) as a result of a single 4-h exposure of O3. We report here on two behaviors of the toad—feeding and escape/exploratory behavior in an open-field arena—after exposure to an acute, short-duration (4-h) exposure of O3 (0.6 _l/L). We hypothesized that both feeding and voluntary lo1210 *Environ. Toxicol. Chem.* 27, 2008 M.R. Dohm et al. comotor behaviors would be depressed after ozone exposure. These two behaviors were selected because both have been shown to be sensitive indicators of stress in anurans.

A total of 65 adult male and female *B. marinus* were collected after sunset by hand from lawns in Hilo (HI, USA) for use in this study. Forty toads (collected in March–April 2003) were used in the feeding trials (body mass mean _ standard deviation [SD], 92 _ 28.0 g, range 48–164 g); 25 toads (collected in September–October 2003) were used for the openfield arena trials (body mass mean _ SD 97 _ 19.7 g, range 60–138 g). Toads were housed individually in plastic cages (15 _ 20 _ 26 cm) with access to a small shelter and water in temperature-controlled (22–25_C) housing with a 13:11 h light:dark

photocycle. No basking light was provided, nor was food provided, which was intended to standardize postabsorptive state. Marine toads were introduced to Hawaii from Puerto Rico in 1932 as biological control agents for the sugar cane beetle [17]. Ozone levels on windward coastal Hawaiian Islands represent atmospheric background levels only; therefore, these toads had not been previously exposed to appreciable amounts of O3.

A concentration of 0.6 _l/L O3 was used for all exposures, which corresponds to levels at the upper range of observations in urban settings. This level of O3 induces significant, but transient respiratory irritation in mammals in short-term single exposures lasting several hours and has been shown by us to affect metabolic and thermoregulatory behavior in reptiles and amphibians and to affect immunologicalfunction in amphibians. Although the dose is at the upperrange of historically recorded values, this is an intermediatedosage used to study effects in human and animal subjects.
The exposure system used in this study has been described previously. The system was designed to deliver either air filtered to remove particles or O3 diluted with filtered air to four exposure chambers (two air, two O3). A parallel exposure system (excluding the O3 generators) was used to deliver air to one or two air-only exposure chambers. Exposure atmospheres were generated by mixing O3 with air drawn from outside the laboratory building at 5 L/min. Ozone was produced by passing air across ultraviolet light sources and the output from the generators was diverted to a 1-L side-arm Erlenmeyer flask resting on a magnetic stirring plate set at low stir rate. A second line from the flask was used to monitor O3 concentrations continuously with an O3 analyzer (1009-CP, Dasibi Environmental, Glendale, CA, USA). The air–O3 mix was then drawn from the flask and diverted to a steel manifold and up to four exposure chambers (975-ml glass jars). Flow rates through the exposure chambers were controlled by upstream steel needle valves calibrated with a mass flow meter (FL-2012, Omega Engineering, Stamford, CT, USA) to deliver 250 ml/min (standard temperature and pressure, dry air; average 247 _ 3.3 ml/min, n _ 19 sets of exposures total; no statistical differences between experiments [feeding trials vs open-field, F _ 0.6, df _ 1, 15, p _ 0.47] or between exposure type [O3 vs air, F1,15 _ 0.1, p _ 0.76]; interaction not significant,F _ 0.1, df _ 1, 15, p _ 0.95).

One to two days after capture, toads (n _ 40) were offered five mealworms (*Tenebrio molitor*) to assess their willingness to consume mealworms (i.e., pre-exposure trial). We selected mealworms that were approximately the same size (judged by weight, to nearest 0.001 g). Mealworms were then placed into an open petri dish taped to the floor of the cage to restrict movement of the mealworms about the cage. After 24 h, the total number of mealworms eaten by each toad was recorded. Only toads that ate one or more mealworms during the preexposure trial were used for subsequent observations; these toads were randomly assigned to exposure groups (13 air, 11 O3). All experiments were conducted at room temperature (22– 25_C, and relative humidity 50–65%). The count of five mealworms was chosen to avoid satiation of the toad (even if all five were eaten, this represents a meal size of _1% of body weight [31]), but at the same time providing a large enough count to show differences between the two treatment groups. Two days after the pre-exposure test, toads were placed individually into glass jars and connected to

the exposure system to receive air or O3 for 4 h as described above. After the exposure was completed, toads were weighed and core body temperature (*T*b) was recorded via a thermocouple probe inserted into the cloaca. Toads were placed back into clean standard cages, and five mealworms were introduced to each cage. The number of mealworms eaten were counted 1 h after exposure. Uneaten mealworms were removed if present. A new batch of five mealworms was added, and at 24 h postexposure, the number of mealworms eaten was scored again, and remaining mealworms were removed and replaced with five new mealworms. At 48 h postexposure, the number of mealworms eaten was counted again.

Movement of individual toads (*n* _ 25) within an open arena was recorded for 1 h on three consecutive days: once before exposure, again 1 h postexposure, then a third time 24 h after exposure. The room housing the arena lacked air conditioning, therefore room temperature and relative humidity tracked ambient conditions (range 23–25_C and 50 65%, respectively). A circular, open arena (area 2.9 m2) was constructed from landscape edging (Master Mark Plastics, Albany, MN, USA) on a floor of short-piled artificial turf. The flooring was marked into grids of 25 by 25 cm. The arena was covered with a thin, clear vinyl covering (Kittrich, La Mirada, CA, USA), and only dim lighting was used for illumination of the arena (60-W broad-spectrum bulb, 10 m away from the arena). Toads were placed individually into the arena and covered with a small cardboard box for 5 min before the start of a trial. Two potential covariates were recorded after a trial for each toad as potential covariates (see *Treatment of missing values* below). Body mass was recorded to the nearest 0.01 g. Corebody temperature (_C) was measured with a thermocouple probe inserted 2 cm into the cloaca (BAT-12, Physitemp Instruments, Clifton, NJ, USA). For repeat measures, toads were tested at approximately the same time on subsequent trials; therefore, the rank order was preserved across trial days (Spearman rank correlation, *r*s, between day 1 and day 2, *r*s _ 0.84; between day 2 and day 3, *r*s _ 0.96; between day 1 and day 3, *r*s _ 0.87; all significantly different from 0 at *p* _0.001). Thus, this protocol induced a correlation between body temperature and time of day at start of the trial (Pearson product– moment correlation, *r* _ 0.45, *n* _ 65 observations, *p* _ Ozone effects on toad behavior *Environ. Toxicol. Chem.* 27, 2008 1211 0.001). However, because the assignment of toads to exposure groups was random with respect to time of day, there was no statistical difference for body temperature between the exposure groups (no exposure, air, O3: analysis of variance [ANOVA] *F* _ 1.33, *df* _ 2, 57, *p* _ 0.273). A video camera (Sony CCD-TRV138, Tokyo, Japan) wainter faced to a VCR (JVC HR-S7500U, Yokohama, Japan) and monitor (Panasonic CT-1386YD, Osaka, Japan) so that trials could be viewed without disturbing the toads. Taped recordings of each trial were then analyzed for total distance moved (counted as number of squares crossed, variable _ distance), total time spent moving (moving), and percent time spent by the toad along the edge versus in the middle of the arena (edge). We counted the number of squares crossed, as opposed to a direct tracing of path covered by each toad. This method introduces some error into our absolute estimate of distance, but the error is conservative with respect to the test of differences between groups. All timing of behaviors was obtained by stopwatch while reviewing videotapes.

All observations of behavior were conducted blind with respect to the exposure condition of the toad (i.e., observers of behavior did not conduct exposures, and records on exposures and behaviors were kept separate during the experiments). All statistical analyses were conducted with Minitab_ version 14 for Microsoft Windows_ 2000 (Redmond, WA, USA). Statistical significance was judged at type I error rate equal to 5%; Fisher's exact tests were conducted as one-tailed tests because we were primarily interested in suppression of feeding by O3 exposure. All remaining statistical hypotheses were two-tailed because we had no a priori expectations for directional differences. Descriptive statistics are reported a means _ 1 SD unless otherwise noted. For all measures of behavior, individuals had three (openfield) four (feeding) records. We therefore evaluated consistency of individual performance, or repeatability, by calculating the intraclass correlation, *r*I, from one-way ANOVA. An intraclass correlation of zero indicates individuals were not consistent from trial to trial.
For each feeding trial, we tested for a statistical association between exposure type and whether toads ate any mealworms with Fisher's exact tests. Fisher's exact probabilities for each table were calculated with the use of a macro available
from the Minitab website (www.minitab.com). The accuracy of the macro was confirmed by hand calculations of data sets. We also used Friedman tests with time after exposure (four levels: prefeeding, 1, 24, and 48 h postexposure) as the treatment factor and with individual as the blocking factor to accommodate the repeated measures design of our experiment. Results from Friedman tests were used to evaluate the hypothesis that within an exposure group, there were no differences among the four feeding trials for number of mealworms eaten by the toads. Potential individual differences among the toads were treated as a blocking effect, permitting a test of the main treatment effect (differences among the trials). The nonparametric Friedman test, as opposed to a repeate measures ANOVA (i.e., split plot design, see below), was appropriate because the response variable was not normally distributed, and no simple transform improved normality. Individuals were treated as fixed rather than random effects because we selected for study only toads that ate mealworms during the prescreening trial. Thus, the Friedman analyses of feeding trials were conducted for each exposure type separately because toads were exposed only once, either to air or to O3. In addition, because the experimental design included only toads that ate on the prefeeding trial, a high correlation between subsequent trials was induced but does not reflect individual differences in feeding behavior that would require a random sampling scheme. For open-field behavior, a general linear model function was used to conduct a repeated measures, mixed-model analysis of covariance (ANCOVA); adjusted (type III) mean squares were used. Because toads did not receive all treatments (i.e., no toad was both air- and ozone-exposed), a split plot design was implemented. The factors (number of levels) in the model were: Trial (pre-exposure and 1 and 24 h postexposure); Exposure (control, air-exposed, and O3-exposed); Individual (nested within Exposure, therefore the split plot); the interaction between Trial and Exposure; and two covariates, body temperature and log-transformed (to improve normality) body mass (g). Trial and Exposure were treated as fixed effects, whereas Individual was treated as a random effect. Tests of slope heterogeneity were carried out for the covariates to validate the use of ANCOVA. Slopes and intercepts were evaluated by multiple regression with an indicator variable (0 for pre-exposure, 1 for 1-h

postexposure) and the cross product between the indicator and predictor (body mass or *T*b) variable.

Some values for covariates used in open-field analyses were not obtained for five toads (*T*b values for pre-exposure trial, and both *T*b and body mass values for the trial 1 h after exposure). For initial analyses, it was desired to maintain as manydegrees of freedom (*df*) as possible; thus, missing values were replaced by either trial means (pre-exposure *T*b _ 25.4_C, 1 h postexposure *T*b _ 24.9_C) or the average body mass for the individual from the pre-exposure and 24-h postexposure trials. Conclusions of statistically significant differences among groups or for covariates were then evaluated on reduced data sets lacking these five individuals. Where results differ, the conclusions for the comparisons were presented on the basis of reduced data set results. Nineteen of 40 toads did not eat mealworms during the24-h prefeeding trial and were therefore excluded from this study. Mean body mass was not statistically different between toads that ate (95 _ 29 g) or did not eat (86 _ 26.5 g, twosample *t* _ 0.87, *df* _ 38, *p* _ 0.390). The remaining 21 toads ate an average of 3.7 (_1.53) mealworms during the prefeedin trial. After exposure (1, 24, and 48 h), all toads ate at least one mealworm (Table 1). Postexposure (1 and 48 h), air-exposed toads ate significantly more of the mealworms offered than did O3-exposed toads (Table 1). The trend was in the same direction for the 24-h postexposure trial, but the difference was not statistically significant (Table 1). For the subset of toads from both groups that ate three or more mealworms at the prefeeding trial, O3-exposed toads consumed fewer mealworms offered compared with air-exposed toads at 1 h (airexposed toads 77.5%, O3-exposed toads 30%; *p* _ 0.0003), 24 h (92.5% air, 80% O3; *p* _ 0.0725), and 48 h (100% air, 76.6% O3; *p* _ 0.0053). The pattern also held for the subset for comparisons of mealworms (*Tenebrio molitor*) eaten by toads (*Bufo marinus*) during 24-h trials beginning 1, 24, and 48 h after a single 4-h exposure to air or to an air–ozone (O3) mix (0.6 _l/L) at a flow rate of 250 ml/mina No. of toads that ate at least one mealworm Yes No *p* Mealworms eaten by toads No. eaten No. not eaten *p* 1 h after exposure Air 8 4 0.1179 Air 36 24 0.0005 O3 3 6 O3 12 33 24 h after exposure Air 10 2 0.4466 Air 47 13 0.1526 O3 8 1 O3 33 12 48 h after exposure Air 9 1 0.3088 Air 41 9 0.0001 O3 5 2 O3 23 27 a Toads were screened before exposure for willingness to eat mealworms. At each trial, toads were offered five mealworms (total mass of mealworms between 0.5 and 1.0 g), and scoring of mealworms eaten was conducted 24 h later Control toad, no exposure; _ toad exposed to air at 250 ml/min for 4 h; _ toad exposed to 0.6 _l/L O3 at 250 ml/min for 4 h; *r*s, the Spearman rank correlation. Lines of identity are provided in the figures to provide reference. (**C**) Plot of distances moved in each of the three open-field arena trials for each toad. of toads that ate four or five mealworms at the prefeeding trial: air exposed toads consumed more mealworms offered 1 h (80% air, 36% O3; *p* _ 0.0006), 24 h (97.1% air, 80% O3; *p* _ 0.0372), and 48 h (100% air, 66.6% O3; *p* _ 0.0045) postexposure. To account for individual differences, a Friedman's test was used, with individual toad as a blocking effect, and trial (pre-, and the three postexposure trials) as main effects. Analyses were conducted separately for air- and O3-exposed toads. Compared with the prefeeding trial, no differences were found for numbers of mealworms eaten by each toad for any of the postexposure trials for the air-exposed toads (grand median _ 5.0; Friedman *S* _ 4.79, *df* _ 3, *p* _ 0.188, adjusted for ties). Toads exposed to O3, however, ate fewer mealworms compared with their

prefeeding records (grand median _ 3.1, Friedman *S* _ 10.78, *df* _ 3, *p* _ 0.013, adjusted for ties), particularly for the 1-h postexposure trial.

Toads were scored for three variables: distance, the total length (m) moved within 1 h; movement, the total time (min) spent moving; and edge, the percent time spent along the edge versus the center of the arena. One day before exposure, toads covered 29 (_19.5) m (maximum _ 86 m), walked or hopped for a total of 14 (_10.6) min (maximum _ 39.4 min), and spent the majority of time near the edge of the arena (83 _ 20%). On the following day, 1 h after exposure, most toads (including the five toads not exposed to either air or O3) covered less than half the pre-exposure trial distance (13 _ 15.6 m; maximum _ 51 m), spent less time moving (7 _ 8.5 min; maximum _ 26.8 min), but spent similar amounts of time near the edge of the arena (74 _ 17%). By the third trial 24 h later, toads covered an average of 17 (_17.4; maximum _ 77) m, moved for an average of 7 (_8.0; maximum _ 37.8) min, and spent 77% (_20%) of the 1-h trial near the edge of the arena. As expected, toads that spent more time moving covered a greater distance during the three 1-h trials. Thus, the two movement variables were virtually collinear (for all observations Pearson product–moment correlation, *r* _ 0.97, *p* _ 0.001). Movement time was therefore dropped from additional analyses. Toads that spent more (arcsine transformed) time along the edge of the arena tended to also move (log-transformed) more, but the correlation was modest (*r* _ 0.37, *p* _ 0.001). Individual toad performance over the three trials was modestly repeatable. Thus, toads that moved more during the pre-exposure trial tended to move more for each of the subsequent trials (for log distance: *r*I _ 0.37, *n* _ 25, *p* _ 0.011, and for log movement: *r*I _ 0.34, *n* _ 25, *p* _ 0.018), but not for percent time along the edge of the arena (*r*I not calculated because the between-component variance was less than the error component of variance). However, toad performance was not repeatable between pre-exposure and 1-h postexposure trials. Only six (three air-, three O3-exposed) of 24 toads moved more after exposure compared with their performance from the pre-exposure trial (Fig. 1) (sample size for this comparison was *n* _ 24 because one toad escaped from the arena Ozone effects on toad behavior *Environ. Toxicol. Chem.* 27, 2008 1213 Repeated measures (split plot) analysis of covariance of total distance moved (meters, log-transformed) in a circular open-field arena by *Bufo marinus* toadsa in 1 h; *df*, degrees of freedom Source *df* Sum of squares Mean square *F p* Log body mass (g)b 1 0.169 0.169 1.36 0.251 Core body temperature (_C)c 1 0.019 0.019 0.15 0.701 Trial 2 1.439 0.719 5.76 0.006 Exposured 2 0.060 0.030 0.12 0.883 Individual (exposure) 22 7.740 0.352 2.82 0.002 Trial _ Exposure 4 0.415 0.104 0.83 0.513 Error 41 5.116 0.125 Total 73 15.861 a Each toad was measured three times (Trial): a pre-exposure trial 1 d before exposures, 1 h after exposure to air or 0.6 _l/L ozone, and again 24 h after exposure. The variable Exposure also had three levels: toads were either exposed for 4 h to 0.6 _l/L ozone at 250 ml/min flow rate, clean air at similar flow rates and duration, or were not exposed (controls). The variable Individual was nested within exposure group, because although each toad was tested three times, each toad did not receive all exposure treatments. The model also tested for one, two-interaction term (Trial _ Exposure). b Missing values for five toads for second trial (1 h after exposure) were replaced by average of first and third trials for the toads. c Missing values for five toads for first (pre-exposure) and second (1 h after exposure) trials were replaced by core body temperature average from other toads for first and second trials.

d Probability of F statistic is approximate because of nested design. during the 1-h postexposure trial and was not recaptured in time to restart the trial). Repeatability between pre-exposure and 1-h postexposure trials for air-exposed toads was negative (i.e., between-group variance component), but for the ozone exposure group, intraclass correlation was 0.43 and approached statistical significance (p _ 0.083). Prescreening performance predicted distance moved by toads during the 24-h postexposure trial (rI _ 0.68, p _ 0.027). Results from full ANCOVAs were as follows. For distance, only Trial and Individual variables were statistically significant. The two covariates, toad body mass and temperature, were not significant predictors. No statistically significant differences due to O3 exposure were found for total distance moved. For percent time along the edge (results not shown), there was a marginally significant effect of the exposure group (p _ 0.043). The difference was that control toads (neither air nor O3 exposure) spent more time along the edge compared with air-exposed toads (F _ 5.64, df _ 1, 18, p _ 0.027) but similar amounts of time along the edge compared with ozone-exposed toads (F _ 5.64, df _ 1, 18, p _ 0.292). Air- and O3-exposed toads were not different for edge (F _ 2.47, df _ 1, 36, p _ 0.122). Checks of slope heterogeneity among the treatment groups for the covariates were not statistically significant for body mass. However, slope heterogeneity among the exposure groups was statistically different for Tb recorded immediately after the open-field trial (Fig. 2). For all three measures of movement within the arena 1 h after ozone exposure, the slopes between toad Tb and behavior were negative (Fig. 2; controls and air-exposed were compared separately but were grouped for the figure; conclusion remains the same). For distance, only one slope for one group (O3-exposed, 1-h postexposure) was significantly different from zero (b _0.78 _ 0.293, p _ 0.038). This slope was statistically different from the slope for movement of control and air-exposed toads on Tb before exposure (t _ 3.11, p _ 0.007). For edge, the comparable slopes were not statistically significantly different from zero. Means for Tb were not different for this trial among the exposure groups (F _ 0.72, df _ 2, 17, p _ 0.499).

From pioneering work in the 1950s, inhalation of ozone is associated with many negative respiratory, cardiovascular, and immunological symptoms in humans and laboratory animals. Significant but transient depressive effects of O3 on voluntary behavior of laboratory rodents were also reported beginning in the 1960s [25]. Short-duration O3 inhalation exposure experiments on laboratory rodents documented depressions of feeding and spontaneous wheel running locomotor behaviors. Our results suggest that a single 4-h exposure to environmentally recorded O3 also depresses feeding behavior in adults of the toad *B. marinus*. The effect of O3 to depress feeding behavior was seen immediately after exposure, but feeding returned to pre-exposure levels within 24 h. Our results also suggest some depression of voluntary locomotor behavior in an open-field arena 1 h after O3 exposure, but only as an indirect effect of body temperature: toads with elevated core body temperatures covered less distance compared with control or air-exposed toads. *Ozone depresses feeding behavior 1 h postexposure* Prey capture behavior consists of a series of steps: toads must orient to the prey, approach the prey to within striking distance, then snap at the prey item.We did not monitor or videotape feeding trials; therefore, we cannot determine which component(s) of the prey capture process was affected by ozone. Neuroethologists

have developed simplified model systems involving presentation of moving graphics against white visual fields that successfully elicit prey capture behavior. Such a system would be very useful for future studies designed to determine which component was affected by ozone. Because we only counted mealworms eaten within a 24-h period, we are also not able to apply a fine-scale analysis of the time course of the effects. Carr and colleagues reported reduction of toads responding to preylike objects 1
h after exposure to ether vapors but also reported that specificcomponents of the behavior were affected in the first 5 min of testing. We adopted the methods used in this study in part for convenience; if O3 has a large effect on prey capture behavior, then the selected method was sufficient to capture that gross change. Feeding behavior by toads depends also on satiety and reproductive condition and is sensitive to many stresses.
All toads used in this study were collected within a few weeks, and experiments were completed within a short time period from capture. Individual differences for movement within the open-field arena were repeatable across the study. Moreover, care was taken to ensure that toads had not been fed before testing, and the amount of mealworms offered each time was well below levels expected to satiate. By prescreening, we identified toads that responded within the experimental protocol to the prey offered. Thus, we are reasonably confident that differences between groups for feeding behavior can be attributed to the effects of ozone and not other factors.

Because both orientation and approach to a prey item precede prey capture in anurans [36] and both behaviors often involve locomotion, we tested toads for gross changes in voluntary locomotor behavior in an open-field arena. The openfield arena test of toad voluntary locomotor behavior probably reflects escape response, and indeed, toads that spent more time along the edge of the arena tended to cover a greater distance. Compared with the pre-exposure trial, there was a significant reduction in distance moved in the arena by all toads in subsequent trials, regardless of exposure, which could suggest some learning. A 50% decrease in distance moved during both 1- and 24-h postexposure trials was significant compared with the first trial. Relative rank order of individual performances was different between the pre-exposure and 1-h postexposure trials. The lack of consistency was the result of the control and air-exposed groups, although substantial individual differences were present for both trials (e.g., coefficients of variation increased for these groups from 19% for pre-exposure to 50% for 1-h postexposure, log-transformed data). Air-exposed toads that moved longer distances on the first trial did not do so on the postexposure trial, and rank order of performances was different. Distances moved by O3- exposed toads were predictable from pre-exposure trials, which suggests the depression in feeding observed for the O3-exposed group was not related to lack of movement per se during feeding trials. We hypothesize that the depressed feeding might be related to an effect on orientation of the toad to the prey items, or the toads might not have recognized the mealworms as food. Thus, in general, there were little or no effects of O3 exposure on movement within the 2.9-m2 open-field arena. A small, difference among the exposure groups for amount of time during the 1-h trial spent near the edge of the arena was statistically significant, but this is not a robust finding. The ANOVAs were recalculated 10 times after dropping one subject at random: in five of 10 cases was p 0.05 (range 0.031– 0.088). One surprising result was a negative and statistically significant relationship between core body temperature andmovement

within the arena 1 h after exposure to ozone. All three measures of movement showed the same trend. The same trend was not observed for the air or control toads.We did not control body temperature, as noted in the *Materials and Methods* section; thus, our results are not a strong test of the correlation between body temperature and locomotion. Because the room lacked temperature control, the air temperature increased through the day, but within a narrow range (23–26_C). This small difference in *T*b was enough to show a statistically significant effect in O3-exposed, but not air-exposed, toads.Moreover, this finding is consistent with our previous study, which showed that O3-exposed toads selected cooler temperatures in a thermal gradient [17,18]. Increased body temperature increases metabolic activity and therefore O3-related effects on tissues. Anurans exposed to O3 adopt a reduced-surface posture, which is similar the water conservation posture .

In many respects, information about human health and morbidity from exposure to air pollution is used to infer effect of oxidant air pollution on wildlife and natural systems. That an environmental stressor, like O3, should affect feeding or locomotor behavior in toads may not be unexpected in retrospect. However, exactly how O3 mediates extrapulmonary Ozone effects on toad behavior *Environ. Toxicol. Chem.* 27, 2008 1215 effects in toads, or other animals, is not known. In mammals, the primary route of exposure is through the lungs, and extrapulmonary effects attributed to ozone exposure are likely due to actions of proinflammatory factors released in the lung and the circulation to other tissues. In toads at rest, both the lungs and skin are likely to be significant exposure routes, which opens up the possibility that the extrapulmonary effects of ozone might be more pronounced in toads and other terrestrial amphibians. Ozone's biological effects are likely associated with its ability to oxidize molecules directly or indirectly through free radical reactions. Reactive oxygen species are known to affect synthesis and turnover rates of many neuropeptides in the brain. For example, short-duration exposure to ozone reduced the rate of dopamine turnover in brain corpus striatum of rat, which is consistent with observations that ozone exposure depresses voluntary locomotion [38]. Reactive oxygen species influence hormonal balance from the hypothalamus; for example, elevated reactive oxygen species stimulate expression of corticotropin-releasing hormone. The hypothalamus has a major role in control of feeding via the many neuropeptides produced or derived from the hypothalamo– pituitary adrenal axis. Corticotropin-releasing hormone, released at elevated levels in response to stress, is known to inhibit visually guided prey-catching behavior in toads. Given the extensiveneuorethological work done on prey capture behavior in toads and the interplay of stress hormones on both feeding and locomotor behavior, the toad offers a compelling model system for investigating the extrapulmonary effects of ozone.

Ozone exposure of toads in a laboratory setting affects thermoregulatory behavior and innate immune function, and our present results add to the list of adverse effects that exposure to oxidant air pollution might cause in terrestrial amphibians. Extrapolating from laboratory results to possible effects in nature is obviously difficult, as demonstrated by the difficulty in determining these links in human populations,
and a number of issues remain to be explored, such as patterns of response at different doses and potential for habituation at low doses. But among these challenges, it should be noted thatO3 affects many aspects of toad behavior and physiology in a manner

consistent with the extensive literature on humans and other mammals. Thus, with the ongoing decline and disappearance of many populations of amphibians, elevated tropospheric (ground-level) O3 could be yet another contributing factor.
Recent studies have linked atmospheric particulate matter with human health problems. In many urban areas, mobile sources are a major source of particulate matter (PM) and the dominant source of fine particles or PM2.5 (PM smaller than 2.5 pm in aerodynamic diameter). Dynamometer studies have implicated diesel engines as being a significant source of ultrafine particles (< 0.1 microm), which may also exhibit deleterious health impacts. In addition to direct tailpipe emissions, mobile sources contribute to ambient particulate levels by brake and tire wear and by resuspension of particles from pavement. Information about particle emission rates, size distributions, and chemical composition from in-use light-duty (LD) and heavy-duty (HD) vehicles is scarce, especially under real-world operating conditions. To characterize particulate emissions from a limited set of in-use vehicles, we studied on-road emissions from vehicles operating under hot-stabilized conditions, at relatively constant speed, in the Tuscarora Mountain Tunnel along the Pennsylvania Turnpike from May 18 through 23, 1999. There were five specific aims of the study. (1) obtain chemically speciated diesel profiles for the source apportionment of diesel versus other ambient constituents in the air and to determine the chemical species present in real-world diesel emissions; (2) measure particle number and size distribution of chemically speciated particles in the atmosphere; (3) identify, by reference to data in years past, how much change has occurred in diesel exhaust particulate mass; (4) measure particulate emissions from LD gasoline vehicles to determine their contribution to the observed particle levels compared to diesels; and (5) determine changes over time in gas phase emissions by comparing our results with those of previous studies. Comparing the results of this study with our 1992 results, we found that emissions of C8 to C20 hydrocarbons, carbon monoxide (CO), and carbon dioxide (CO2) from HD diesel emissions substantially decreased over the seven-year period. Particulate mass emissions showed a similar trend. Considering a 25-year period, we observed a continued downward trend in HD particulate emissions from approximately 1,100 mg/km in 1974 to 132 mg/km (reported as PM2.5) in this study. The LD particle emission factor was considerably less than the HD value, but given the large fraction of LD vehicles, emissions from this source cannot be ignored. Results of the current study also indicate that both HD and LD vehicles emit ultrafine particles and that these particles are preserved under real-world dilution conditions. Particle number distributions were dominated by ultrafine particles with count mean diameters of 17 to 13 nm depending on fleet composition. These particles appear to be primarily composed of sulfur, indicative of sulfuric acid emission and nucleation. Comparing the 1992 and 1999 HD emission rates, we observed a 48% increase in the NOx/CO2 emissions ratio. This finding supports the assumption that many new-technology diesel engines conserve fuel but increase NOx emissions.
moderate to major damage has been experienced by many tunnels during earthquakes, as summarized by Dowding and Rozen (1978), Owen and Scholl (1981), Sharma and Judd (1991), and Power et al. (1998), among others. The greatest incidence of severe damage has been associated with large ground displacements due to ground failure, i.e., fault rupture through a tunnel, landsliding (especially at tunnel portals), and soil liquefaction. Ground shaking in the absence of ground failure has produced a lower incidence and

degree of damage in general, but has resulted in moderate to major damage to some tunnels in recent earthquakes. The most recent reminder of seismic risk to underground structures under the ground shaking effect is the damage and near collapse at the Daikai and Nagata subway stations (Kobe Rapid Transit Railway) during the 1995 Kobe Earthquake in Japan . Near-surface rectangular cut-and-cover tunnels and immersed tube tunnels in soil have also been vulnerable to transient seismic lateral ground displacements, which tend to cause racking of a tunnel over its height and increased lateral pressures on the tunnel walls. Their seismic performance could be vital, particularly when they comprise important components of a critical transportation system (e.g., a transit system) to which little redundancy exists.
Earthquakes are produced by abrupt relative movements on fractures or fracture zones in the earth's crust. These fractures or fracture zones are termed *earthquake faults*. The mechanism of fault movement is elastic rebound from the sudden release of built-up strain energy in the crust. The built-up strain energy accumulates in the earth's crust through the relative movement of large, essentially intact pieces of the earth's crust called *tectonic plates*. This relief of strain energy, commonly called *fault rupture*, takes place along the *rupture zone*. When fault rupture occurs, the strained rock rebounds elastically. This rebound produces vibrations that pass through the earth crust and along the earth's surface, generating the ground motions that are the source of most damage attributable to earthquakes. If the fault along which the rupture occurs propagates upward to the ground surface and the surface is uncovered by sediments, the relative movement may manifest itself as *surface rupture*. Surface ruptures are also a source of earthquake damage to constructed facilities including tunnels.

For the continental United States, the principal tectonic plate boundary is along the western coast of the continent, where the North American Plate and the Pacific Plate are in contact. In California, the boundary between these plates is a transform fault wherein the relative movement is generally one of lateral slippage of one plate past the other. Elsewhere along the west coast (e.g., off the coast of Oregon, Washington, and Alaska), the plate boundary is a *subduction zone* wherein one plate dives (subducts) beneath the other plate. In the western interior of the United States, adjacent to the western edge of the American Plate, there may be subplates that have formed as a result of subcrustal flow. Earthquake sources in Utah and Montana may be attributable to such subplate sources. Earthquake source areas in the central and eastern United States and along the Saint Lawrence Valley are within the American Plate and are considered to be intraplate source zones. The mechanisms generating earthquakes in these intraplate zones are poorly understood, but may be related to relief of locked-in stresses from ancient tectonic movements, crustal rebound from the ice ages, re-adjustment of stress in the interior of the plate due to boundary loads, sediment load such as the Mississippi River basin, or other unrecognized mechanisms. Earthquakes in Hawaii are believed to be associated with an isolated plume of molten rock from the mantle referred to as a hot spot.

The intensity and impact of earthquakes may be as great or greater in the plate interiors as they are at the active plate boundaries. The differences between plate boundary and intraplate earthquakes is in their geographic spread and the frequency of occurrence.

Earthquake activity is much greater along the plate boundaries than in the plate interior. However, ground motions from intraplate earthquakes tend to attenuate, or dissipate, much more slowly than those from plate boundary events. Plate boundary faults are relatively longer than those in the plate interior and tend to be associated with a smaller *stress drop* (the stress drop is the sudden reduction of stress across the fault plane during rupture), longer duration of shaking, and a more frequent rate of earthquake occurrence.

Faults are created when the stresses within geologic materials exceed the ability of those materials to withstand the stresses. Most faults that exist today are the result of tectonic activity that occurred in earlier geological times. These faults are usually non-seismogenic (i.e. incapable of generating earthquakes, or inactive). However, faults related to past tectonism may be reactivated by present-day tectonism in seismically active areas and can also be activated by anthropogenic (man-made) activities such as impoundment of a reservoir by a dam or injection of fluids (e.g. waste liquids) deep into the subsurface. The maximum size of an earthquake on an anthropogenically reactivated fault is a subject of some controversy, but earthquakes as large as moment magnitude 6.5 have been attributed to reservoir impoundment.

Not all faults along which relative movement is occurring are a source of earthquakes. Some faults may be surfaces along which relative movement is occurring at a slow, relatively continuous rate, with an insufficient stress drop to cause an earthquake. Such movement is called *fault creep*. Fault creep may occur along a shallow fault, where the low overburden stress on the fault results in a relatively low threshold stress for initiating displacement along the fault. Alternatively, a creeping fault may be at depth in soft and/or ductile materials that deform plastically. Also, there may be a lack of frictional resistance or asperities (non-uniformities) along the fault plane, allowing steady creep and the associated release of the strain energy along the fault. Fault creep may also prevail where phenomena such as magma intrusion or growing salt domes activate small shallow faults in soft sediments. Faults generated by extraction of fluids (e.g., oil or water in southern California), which causes ground settlement and thus activates faults near the surface may also result in fault creep. Faults activated by other non-tectonic mechanisms, e.g. faults generated by gravity slides that take place in thick, unconsolidated sediments, could also produce fault creep.

Active faults that extend into crystalline bedrock are generally capable of building up the strain energy needed to produce, upon rupture, earthquakes strong enough to affect transportation facilities. Fault ruptures may propagate from the crystalline bedrock to the ground surface and produce ground rupture. Fault ruptures which propagate to the surface in a relatively narrow zone of deformation that can be traced back to the causative fault in crystalline rock are sometimes referred to as primary fault ruptures. Fault ruptures may also propagate to the surface in diffuse, distributed zones of deformation which cannot be traced directly back to the basement rock. In this case, the surface deformation may be referred to as secondary fault rupture.

Whether or not a fault has the potential to produce earthquakes is usually judged by the recency of previous fault movements. If a fault has propagated to the ground surface,

evidence of faulting is usually found in geomorphic features associated with fault rupture (e.g., relative displacement of geologically young sediments). For faults that do not propagate to the ground surface, geomorphic evidence of previous earthquakes may be more subdued and more difficult to evaluate (e.g., near surface folding in sediments or evidence of liquefaction or slumping generated by the earthquakes). If a fault has undergone relative displacement in relatively recent geologic time (within the time frame of the current tectonic setting), it is reasonable to assume that this fault has the potential to move again. If the fault moved in the distant geologic past, during the time of a different tectonic stress regime, and if the fault has not moved in recent (Holocene) time (generally the past 11,000 years), it may be considered inactive. For some very important and critical facilities, such as those whose design is governed by the US Nuclear Regulatory Commission (NRC), a timeframe much longer than the 11,000-yr criterion has been used. In accordance with the US NRC regulations a fault is defined as "capable" (as opposed to "active") if it has shown activity within the past 35,000 years or longer.

Geomorphic evidence of fault movement cannot always be dated. In practice, if a fault displaces the base of unconsolidated alluvium, glacial deposits, or surficial soils, then the fault is likely to be active. Also, if there is micro-seismic activity associated with the fault, the fault may be judged as active and capable of generating earthquakes. Microearthquakes occurring within basement rocks at depths of 7 to 20 km may be indicative of the potential for large earthquakes. Microearthquakes occurring at depths of 1 to 3 km are not necessarily indicative of the potential for large, damaging earthquake events. In the absence of geomorphic, tectonic, or historical evidence of large damaging earthquakes, shallow microtremors may simply indicate a potential for small or moderate seismic events. Shallow microearthquakes of magnitude 3 or less may also sometimes be associated with mining or other non-seismogenic mechanisms. If there is no geomorphic evidence of recent seismic activity and there is no microseismic activity in the area, then the fault may be inactive and not capable of generating earthquakes.

In some instances, fault rupture may be confined to the subsurface with no relative displacement at the ground surface due to the fault movement. Subsurface faulting without primary fault rupture at the ground surface is characteristic of almost all but the largest magnitude earthquakes in the central and eastern United States . Due to the rarity of large magnitude intraplate events, geological processes may erase surface manifestations of major earthquakes in these areas. Therefore, intraplate seismic source zones often must be evaluated using instrumental seismicity and paleoseismicity studies. This is particularly true if the intraplate sources are covered by a thick mantle of sediments, as in the New Madrid, Tennessee, and Charleston, South Carolina, intraplate seismic zones. Instrumental recording of small magnitude events can be particularly effective in defining seismic source zones.

Essentially all of the active faults with surface fault traces in the United States are shallow crustal faults west of the Rocky Mountains . However, not all shallow crustal faults west of the Rocky Mountains have surface fault traces. Several recent significant earthquakes along the Pacific Coast plate boundary (e.g., the 1987 Whittier Narrows

earthquake and the 1994 Northridge earthquake) were due to rupture of thrust (compressional) faults that did not break the ground surface, termed *blind thrust* faults.

A long fault, like the San Andreas Fault in California or the Wasatch Fault in Utah, typically will not move along its entire length at any one time. Such faults typically move in portions, one segment at a time. An immobile (or "locked") segment, a segment which has remained stationary while the adjacent segments of the fault have moved, is a strong candidate for the next episode of movement.

Earthquake magnitude, M, is a measure of the energy released by an earthquake. A variety of different earthquake magnitude scales exist. The differences among these scales is attributable to the earthquake characteristic used to quantify the energy content. Characteristics used to quantify earthquake energy content include the local intensity of ground motions, the body waves generated by the earthquake, and the surface waves generated by the earthquake. In the eastern United States, earthquake magnitude is commonly measured as a (short period) *body wave magnitude*, m_b. However, the (long period) body wave magnitude, m_B, scale is also sometimes used in the central and eastern United States . In California, earthquake magnitude is often measured as a *local (Richter) magnitude*, M_L, or *surface wave magnitude*, M_s. The *Japan Meteorological Agency Magnitude* (M_{JMA}) scale is commonly used in Japan .

Due to limitations in the ability of some recording instruments to measure values above a certain amplitude, some of these magnitude scales tend to reach an asymptotic upper limit. To correct this, the *moment magnitude*, M_w, scale was developed by seismologists (Hanks and Kanamori, 1979). The moment magnitude of an earthquake is a measure of the kinetic energy released by the earthquake. M_w is proportional to the *seismic moment*, defined as a product of the material rigidity, fault rupture area, and the average dislocation of the rupture surface.

For the seismic design of underground tunnel facilities, one of the main tasks is to define the design earthquake(s) and the corresponding ground motion levels and other associated seismic hazards. The process by which design ground motion parameters are established for a seismic analysis is termed the *seismic hazard analysis*. Seismic hazard analyses generally involve the following steps:

- Identification of the seismic sources capable of strong ground motions at the project site
- Evaluation of the seismic potential for each capable source
- Evaluation of the intensity of the design ground motions at the project site

Identification of seismic sources includes establishing the type of fault and its geographic location, depth, size, and orientation. Seismic source identification may also include specification of a random seismic source to accommodate earthquakes not associated with any known fault. Evaluation of the seismic potential of an identified source involves evaluation of the earthquake magnitude (or range of magnitudes) that the source can generate and, often times, the expected rate of occurrence of events of these magnitudes.

Identification of capable seismic sources together with evaluation of the seismic potential of each capable source may be referred to as *seismic source characterization*. Once the seismic sources are characterized, the intensity of ground motions at the project site from these sources must be characterized. There are three general ways by which the intensity of ground motions at a project site is assessed in practice. They are, in order of complexity: (1) use of existing hazard analysis results published by credible agencies such as US Geological Survey (USGS) and some State agencies; (2) project-specific and site-specific deterministic seismic hazard evaluation; and (3) project-specific and site-specific probabilistic seismic hazard evaluation. Which particular approach is adopted may depend on the importance and complexity of the project and may be dictated by regulatory agencies.

The choice of the design ground motion level, whether based upon probabilistic or deterministic analysis, cannot be considered separately from the level of performance specified for the design event. Sometimes, facilities may be designed for multiple performance levels, with a different ground motion level assigned to each performance level, a practice referred to as performance based design. Common performance levels used in design of transportation facilities include protection of life safety and maintenance of function after the event. A safety level design earthquake criterion is routinely employed in seismic design. Keeping a facility functional after a large earthquake adds another requirement to that of simply maintaining life safety, and is typically required for critical facilities.

The collapse of a modern transportation tunnel (particularly for mass transit purpose) during or after a major seismic event could have catastrophic effects as well as profound social and economical impacts. It is typical therefore for modern and critical transportation tunnels to be designed to withstand seismic ground motions with a return period of 2,500 years, (corresponding to 2 % probability of exceedance in 50 years, or 3% probability of exceedance in 75 years). In addition, to avoid lengthy down time and to minimize costly repairs, a modern and critical transportation tunnel is often required to withstand a more frequent earthquake (i.e., a lower level earthquake) with minimal damage. The tunnel should be capable of being put immediately back in service after inspection following this lower level design earthquake. In the high seismic areas, this lower level earthquake is generally defined to have a 50% probability of probability of exceedance 75 years, corresponding to a 108-year return period. In the eastern United States, where earthquake occurrence is much less frequent, the lower level design earthquake for modern and critical transportation tunnels is generally defined at a higher return period such as 500 years.

1. A probabilistic seismic hazard analysis incorporates the likelihood of a fault rupturing and the distribution of earthquake magnitudes associated with fault rupture into the assessment of the intensity of the design ground motion at a site. The objective of a probabilistic seismic hazard analysis is to compute, for a given exposure time, the probability of exceedance corresponding to various levels of a ground motion parameter (e.g., the probability of exceeding a peak ground acceleration of 0.2 g in a 100-year period). The ground motion parameter may be either a peak value (e.g., peak ground acceleration) or a response spectra ordinate associated with the strong ground motion at the site. The probabilistic value of the design parameter incorporates both the uncertainty of the attenuation of strong

ground motions and the randomness of earthquake occurrences. A probabilistic seismic hazard analysis usually includes the following steps, Identify the seismic sources capable of generating strong ground motion at the project site. In areas where no active faults can be readily identified it may be necessary to rely on a purely statistical analysis of historical earthquakes in the region.

2. Determine the minimum and maximum magnitude of earthquake associated with each source and assign a frequency distribution of earthquake occurrence to the established range of magnitudes. The Gutenberg-Richter magnitude-recurrence relationship (Gutenberg and Richter, 1942) is the relationship used most commonly to describe the frequency distribution of earthquake occurrence. While the maximum magnitude is a physical parameter related to the fault dimensions, the minimum magnitude may be related to both the physical properties of the fault and the constraints of the numerical analysis.
3. For each source, assign an attenuation relationship on the basis of the style of faulting. Uncertainty is usually assigned to the attenuation relationships based upon statistical analysis of attenuation in previous earthquakes.
4. Calculate the probability of exceedance of the specified ground motion parameter for a specified time interval by integrating the attenuation relationship over the magnitude distribution for each source and summing up the results.

Peak ground acceleration (PGA), particularly in the horizontal direction, is the most common index of the intensity of strong ground motion at a site. Peak ground velocity (PGV) and peak ground displacement (PGD) are also used in some engineering analyses to characterize the damage potential of ground motions. For seismic design and analysis of underground structures including tunnels, the PGV is as important as the PGA because ground strains (or the differential displacement between two points in the ground) can be estimated using the PGV. PGA values are generally available from published hazard results such as those from the USGS hazard study. Attenuation relations are also generally available for estimating PGA values. However, there has been little information in the past for estimating the PGV values. Previous studies have attempted to correlate the PGV with PGA by establishing PGV-to-PGA ratios (as a function of earthquake magnitudes, site soil conditions, and source-to-site distance in some cases). However, these correlations were derived primarily from ground motion database in the Western United States (WUS) and failed to account for the different ground motion characteristics in the Central and Eastern United States (CEUS). Recent study (NCHRP-12-70, 2008) has found that PGV is strongly correlated with the spectral acceleration at 1.0 second (S_1). Using published strong motion data, regression analysis was conducted and the following correlation has been recommended for design purposes. n a broad sense, earthquake effects on underground tunnel structures can be grouped into two categories: (1) ground shaking, and (2) ground failure. Based on tunnel performance records during past earthquakes, the damaging effects of ground failure on tunnels are significantly greater than the ground shaking effects.

Ground Shaking: Ground shaking refers to the vibration of the ground produced by seismic waves propagating through the earth's crust. The area experiencing this shaking may cover hundreds of square miles in the vicinity of the fault rupture. The intensity of

the shaking attenuates with distance from the fault rupture. Ground shaking motions are composed of two different types of seismic waves, each with two sub-types, described as follows:

- Body waves traveling within the earth's material. They may be either longitudinal P waves or transverse shear S waves and they can travel in any direction in the ground.
- Surface waves traveling along the earth's surface. They may be either Rayleigh waves or Love waves.

As the ground is deformed by the traveling waves, any tunnel structure in the ground will also be deformed, since tunnel structures are constrained by the surrounding medium (soil or rock). As long as the ground (i.e., the surrounding medium) is stable, the structures cannot move independently of the ground. Therefore, the design and analysis of underground structures is based on ground deformations/strains rather than ground acceleration values. If the magnitude of ground deformation during earthquakes is small, the seismic effect on tunnels is negligible. For example, there is generally little concern for tunnel sections constructed in reasonably competent rock because the seismically induced deformations/strains in rock are generally very small, except when shear/fault zones are encountered or when there are large loosened rock pieces behind the lining. In loose or soft soil deposits, on the other hand, the soil deformation developed during the design earthquake(s) should be estimated and used for the structure's design and analysis. In general the potential effects of ground shaking range from minor cracking of a concrete liner to collapse of the liner and major caving of geologic materials into the tunnel.

Ground Failure: Ground failure broadly includes various types of ground instability such as fault rupture, tectonic uplift and subsidence, landsliding, and soil liquefaction. Each of these hazards may be potentially catastrophic to tunnel structures, although the damages are usually localized. Design of a tunnel structure against ground instability problems is often possible, although the cost may be high.

If an active fault crosses the tunnel alignment, there is a hazard of direct shearing displacement through the tunnel in the event of a moderate to large magnitude earthquake. Such displacements may range from a few inches to greater than ten feet and, in many cases, may be concentrated in a narrow zone along the fault. Fault rupture can and has had very damaging effects on tunnels. Tectonic uplift and subsidence can have similar damaging effects to fault rupture, if the uplift/subsidence movements cause sufficient differential deformation of the tunnel.

Landsliding through a tunnel, whether statically or seismically induced, can result in large, concentrated shearing displacements and either full or partial collapse of tunnel cross sections. Landslide potential is greatest when a preexisting landslide mass intersects the tunnel. A statically stable landslide mass may be activated by earthquake shaking. The hazard of landsliding is usually greatest in shallower parts of a tunnel alignment and at tunnel portals.

For tunnels located in soils below the groundwater table, there could be a potential for liquefaction if loose to medium-dense cohesionless soils (sands, silts, gravels) are adjacent to the tunnel. Potential effects of liquefaction of soils adjacent to a tunnel include: (a) increased lateral pressures on the lining or walls of the tunnel, which could lead to failure of the lining or walls depending on their design; (b) flotation or sinking of a tunnel embedded in liquefied soil, depending on the relative weight of the tunnel and the soils replaced by the tunnel; and (c) lateral displacements of a tunnel if there is a free face toward which liquefied soil can move and/or if the tunnel is constructed below sloping ground.

Other unfavorable geologic conditions could lead to unsatisfactory seismic tunnel performance unless recognized and adequately accounted for in the tunnel design and construction. Unfavorable geologic conditions include: soft soils; rocks with weak planes intersecting a tunnel, such as shear zones or well developed weak bedding planes and well developed joint sets that are open or filled with weathered and decomposed rock; failures encountered during tunnel construction that may have further weakened the geologic formations adjacent to a tunnel (e.g., cave-ins or running ground leaving incompletely filled voids or loosened rock behind a lining; squeezing ground with relatively low static factor of safety against lining collapse); and adjacent geologic units having major contrasts in stiffness that can lead to stress concentrations or differential displacement. Elements of tunnel design, construction, and condition that may influence tunnel seismic behavior include:

1. Whether seismic loadings and behavior were explicitly considered in tunnel design
2. The nature of the tunnel lining and support system (e.g., type of lining, degree of contact between lining/support systems and geologic material, use of rock bolts and dowels)
3. Junctions of tunnels with other structures
4. History of static tunnel performance in terms of failures and cracking or distortion of lining/support system
5. Current condition of lining/support system, such as degree of cracking of concrete and deterioration of concrete or steel materials over time.

In evaluating an existing tunnel in the screening stage or in a more detailed evaluation, or in designing retrofit measures, it is important to obtain as complete information as possible on the tunnel design, construction, and condition and the geologic conditions along the tunnel alignment. To obtain this information, the design and evaluation team should review the design drawings and design studies, as-built drawings, construction records as contained in the construction engineer daily reports and any special reports, maintenance and inspection records, and geologic and geotechnical reports and maps. Special inspections and investigations may be needed to adequately depict the existing conditions and determine reasons for any distress to the tunnel.

There are certain conditions that would clearly indicate a potentially significant seismic risk to a bored tunnel, cut-and-cover tunnel, or submerged tube and thus require more detailed evaluations. These conditions include:

- An active fault intersecting the tunnel;
- A landslide intersecting the tunnel, whether or not the landslide is active;
- Liquefiable soils adjacent to the tunnel, and
- History of static distress to the tunnel (e.g., local collapses, large deformations, cracking or spalling of the liner due to earth movements), unless retrofit measures were taken to stabilize the tunnel.

In addition to the above, detailed seismic evaluations should also be conducted for tunnels that are considered lifeline structures (important and critical structures) that must be usable or remain open to traffic immediately after the earthquake. Transit tunnels in metropolitan areas are often considered as critical/lifeline structures and, therefore, warrant detailed seismic evaluations.

If the above conditions do not exist, then the risk to a bored tunnel is a function of the tunnel design and construction, the characteristics of the geologic media, and the level of ground shaking. In this section, additional screening guidelines are presented considering these factors and empirical observations of tunnel performance during earthquakes.

It should be noted that although not as damaging as ground failure effects, ground shaking effect alone (i.e., in the absence of ground failure) has resulted in moderate to major damage to many tunnels in earthquakes. Figure 13-8 shows a highway tunnel experiencing lining falling off from tunnel crown under the ground shaking effect during the 2004 Niigata Earthquake in Japan. In another incident, the 1999 Koceali Earthquake in Turkey caused the collapse of two tunnels (the Bolu Tunnels) constructed using NATM method (15 m arch high and 16 m wide). At the time of the earthquake, the collapsed section of the tunnel had been stabilized with steel rib, shotcrete, and anchors.

The 1995 Kobe Earthquake also caused a major collapse of the Daikai subway station which was constructed by cut-and-cover method without specific seismic design provisions. The schematic drawing shown in Figure 13-12 (Iida et al., 1996) shows the collapse experienced by the center columns of the station, which was accompanied by the collapse of the ceiling slab and the settlement of the soil cover by more than 2.5 m. The relatively poor performance of cut-and-cover tunnels under the ground shaking effect may reflect: (1) relatively softer near-surface geologic materials surrounding these types of structures as compared to the harder materials that often surround bored tunnels at greater depths; (2) higher levels of acceleration at and near the ground surface than at depth (due to tendencies for vibratory ground motions to reduce with depth below the ground surface); and (3) vulnerability of these box-like structures to seismically induced racking deformations of the box cross section (Refer to Figure 13-13 in Section 13.5), unless specifically designed to accommodate these racking deformations. Cut-and-cover tunnels in soil tend to be more vulnerable than those excavated into rock because of the larger soil shear deformations causing the tunnel racking. Tunnels in soft soil may be

especially vulnerable. The most important determinant in assessing whether more detailed seismic evaluations of cut-and-cover tunnels are required is whether the original design considered loadings and deformations consistent with the seismic environment and geologic conditions, and especially, whether racking behavior was taken into account in the seismic analysis, design, and detailing of the structure. Submerged tubes are particularly susceptible to permanent ground movements during seismic shaking. Tubes are typically located at shallow depths and in soft or loose soils. Liquefaction of loose cohesionless soils may cause settlement, uplift (flotation), or lateral spreading. Earthquake shaking may also cause permanent displacement of soft clay soils on sloping ground. Joints connecting tube segments must accommodate the relative displacement of adjacent segments while maintaining a watertight seal. Generally, submerged tubes can be screened out from more detailed evaluations if the original design appropriately considered and analyzed the potential for ground failure modes and if joints have been carefully designed to achieve water tightness. Underground tunnel structures undergo three primary modes of deformation during seismic shaking: ovaling/racking, axial and curvature deformations. The ovaling/racking deformation is caused primarily by seismic waves propagating perpendicular to the tunnel longitudinal axis, causing deformations in the plane of the tunnel cross section; Vertically propagating shear waves are generally considered the most critical type of waves for this mode of deformation. The axial and curvature deformations are induced by components of seismic waves that propagate along the longitudinal axis. The evaluation procedures for transverse response of tunnel structures can be based on either (1) simplified analytical method, or (2) more complex numerical modeling approach, depending on the degree of complexity of the soil-structure system, subsurface conditions, the seismic hazard level, and the importance of the structures. The numerical modeling approach should be considered in cases where simplified analysis methods are less applicable, more uncertain, or inconclusive, or where a very important structure is located in a severe seismic environment or where case history data indicate relatively higher seismic vulnerability for the type of tunnel, such as rectangular cut-and-cover tunnels in seismically active areas. As mentioned earlier, ovaling of a circular tunnel lining is primarily caused by seismic waves propagating in planes perpendicular to the tunnel axis. The results are cycles of additional stress concentrations with alternating compressive and tensile stresses in the tunnel lining. These dynamic stresses are superimposed on the existing static state of stress in the lining. Several critical modes may result (Owen and Scholl, 1981):

- Compressive dynamic stresses added to the compressive static stresses may exceed the compressive capacity of the lining locally.
- Tensile dynamic stresses subtracted from the compressive static stresses reduce the lining's moment capacity, and sometimes the resulting stresses may be tensile.

When a circular lining is assumed to oval in accordance with the deformations imposed by the surrounding ground (e.g., shear), the lining's transverse sectional stiffness is completely ignored. This assumption is probably reasonable for most circular tunnels in rock and in stiff soils, because the lining stiffness against distortion is low compared with that of the surrounding medium. Depending on the definition of "ground deformation of surrounding medium," however, a design based on this assumption may be overly

conservative in some cases and non-conservative in others. This will be discussed further below.

Shear distortion of the surrounding ground, for this discussion, can be defined in two ways. If the non-perforated ground in the free-field is used to derive the shear distortion surrounding the tunnel lining, the lining is to be designed to conform to the maximum diameter change,

As mentioned earlier, the greatest risk to tunnel structures is the potential for large ground movements as a result of unstable ground conditions (e.g., liquefaction and landslides) or fault displacements. In general, it is not feasible to design a tunnel structure to withstand large ground displacements. The proper design measures in dealing with the unstable ground conditions may consist of:

- Ground stabilization
- Removal and replacement of the problem soils
- Re-route or deep burial to bypass the problem zone

With regard to the fault displacements, the best strategy is to avoid any potential crossing of active faults. If this is not possible, then the general design philosophy is to accept and accommodate the displacements by either employing an oversized excavation, perhaps backfilled with compressible/collapsible material, or using ductile lining to minimize the instability potential of the lining. In cases where the magnitude of the fault displacement is limited or the width of the sheared fault zone is considerable such that the displacement is dissipated gradually over a distance, design of a strong lining to resist the displacement may be technically feasible. The structures, however, may be subject to large axial, shear and bending forces. Many factors need to be considered in the evaluation, including the stiffness of the lining and the ground, the angle of the fault plane intersecting the tunnel, the width of the fault, the magnitude as well as orientation of the fault movement. Analytical procedures are generally used for evaluating the effects of fault displacement on lining response. Some of these procedures were originally developed for buried pipelines (ASCE Committee on Gas and Liquid Fuel Lifelines, 1984). Continuum finite-element or finite-difference methods have also been used effectively for evaluating the tunnel-ground-faulting interaction effects.

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Assessing the behavior of a tunnel that may be subject to the direct shear displacements along a fault includes, first, characterizing the free-field fault displacement (i.e., displacements in the absence of the tunnel) where the fault zone crosses the tunnel and, second, evaluating the effects of the characterized displacements on the tunnel. When subjected to fault differential displacements, a buried structure with shear and bending stiffness tends to resist the deformed configuration of the fault offset, which induces axial and shear forces and bending moments in the structure. The axial deformation is resisted by the frictional forces that develop at the soil-tunnel interface in the axial direction, while shear and curvature deformations are caused by the soil resistance normal to the tunnel lining or walls. If liquefiable soil deposits or unstable soil masses susceptible to landsliding are identified along the tunnel alignment, then more detailed evaluations may be required to assess whether liquefaction or landsliding would be expected to occur during the design earthquake and to assess impacts on the tunnel.

If slope movements due to landsliding or lateral spreading movements due to liquefaction intersect a tunnel, the potential effects of these movements on the tunnel are similar to those of fault displacement. As is the case for fault displacements, tunnels generally would not be able to resist landsliding or lateral spreading concentrated displacements larger than a few inches without experiencing locally severe damage.

If liquefaction were predicted to occur adjacent to a tunnel lining or wall, a potential consequence could be yielding of the lining or wall due to the increased lateral earth pressure in the liquefied zone. The pressure exerted by a liquefied soil may be as large as the total overburden pressure. The potential for liquefaction to cause uplift of a tunnel embedded in liquefied soil, or for the tunnel to settle into the soil, should also be checked.

Geologic events, and seismic activity in particular, are the primary natural hazards of the community. Earthquakes are caused by violent and abrupt releases of strain releases built

up along faults. When a fault ruptures, energy is released in all directions from the source, or epicenter, in the form of seismic waves.

Earthquakes generate two types of hazards. Primary hazards are ground shaking and surface rupture along faults. Secondary hazards result from the interaction if ground shaking with existing ground instabilities and include liquefication, settlement and landslides.

The City of South Pasadena is located in seismically active region, in an area of potential fault rupture, strong ground shaking and slope instability. These geologic and seismic hazards can affect the structural integrity of structures and utilities, and in turn can cause severe property damage and potential loss of life.

In California, faults are common, ranging from small breaks of an inch or less, to the San Andreas fault which extends for hundreds of miles. In addition to size, the age of a fault has a direct bearing on the likelihood of generating an earthquake. Many large faults have mot moved for millions of years and are considered "dead" or inactive.

The Alquist-Priolo Zones Special Studies Act defines "active" faults as those that have experienced surface displacement, or movement during the last 11,000 years. Faults classified as potentially active moved during the last 2 million years. Faults that have not moved within the last 2 million years are considered inactive.

Local faults: The seismicity of the Southern Californai region and its relationship to the City of South Pasadena are the Sierra Madre Fault system, the Whittier Fault, and the San Andreas Fault. An earthquake anywhere on any of those faults could trigger secondary impacts on the City.

Three other faults influence the City of South Pasadena: the Raymond Hill Fault, the York Boulevard Fault, and the Elysian Park Fault. Between these three faults, much of the the City is subject to earthquake hazard. Raymond Hill Fault is the only active fault running through South Pasadena that is designated as an Alquist-Priolo Special Study Zone. This fault is a reverse, left-slip, 12 miles in length, and extends through the southern portion of South Pasadena. The Raymond Hill Fault is believed to have moved within the past 3,000 years.

Recent fire disasters in European road tunnels have shown that fires in a tunnel represent high risks. The users and the rescue services are endangered by heat, smoke and also explosive concrete spalling of the tunnel lining. The tunnel itself is often damaged considerably. The necessary long refurbishment works have negative effects on the tunnel service availability and also cause high costs forthe tunnel owner. Thus high safety demands must be placed on complex nfrastructural facilities such as road tunnels.
In the event of fire the temperature in a tunnel rises extremely rapidly within a short amount of time. Large scale fire tests have shown that maximum temperatures of 1200°C or even above could occur. The result is an increased risk of explosive concrete spalling

of the tunnel lining. Fires in road tunnels are characterised by the affected persons being endangered and in many cases by the considerable amount of damage caused to facilities. Depending on depth and quantity of these spallings, the structure could be damaged seriously and in the worst case the tunnel stability could be influenced negatively. Major fires can result in tunnel users coming to harm and vehicles being seriously damaged quite apart from effects on the tunnels themselves. The damage is caused particularly by the spontaneous development of great amounts of heat and aggressive fire gases. Following the fire, the damage caused to the tunnel itself can badly affect the service availability because the tunnel is closed to traffic due to the necessary refurbishment works. Depending on the duration of the fire and the chronological temperature development, the stability of the tunnel can be negatively influenced. Redevelopment and the associated discontinuation of services can last for weeks or even months. The main damage patterns to a tunnel obtained from investigations on fire accidents can be summarised as follows:

- Some 5 – 10 min. must be estimated for the "flash over" – the time required for a smouldering fire to become a "full fire" resulting in a steep rise in temperature in the affected area in the case of heavy vehicles.
- The duration of the fire varies considerably – between 30 minutes and a number of hours.
- The in some cases considerable damage to the tunnel structure resulting from major fires is caused by the high fire load of heavy vehicles.
- Damage to the concrete tunnel lining is mainly caused by spallings as well as the condensation of smoke gas on the tunnel wall, the ceiling and the operational installations. During a fire in the Tauern Tunnel on May 29, 1999, a total of 34 vehicles were destroyed. 12 persons lost their lives and considerable damage was caused to vehicles and to the tunnel structure. Concrete spallings with a depth of 10 to 15 cm were measured at the tunnel lining. The effect of temperature on the concrete tunnel lining can lead to damage in many different ways:
- The spalling process is largely influenced by the speed at which the temperature rises, the moisture of the concrete and through the pore structure(compactness). The formation of water vapour leads to stresses in the concrete matrix as from 100 °C, which can in some cases lead to large-scale spalling. Depending on the residual moisture and the concrete matrix set-up it cannot be precluded that the extent of damage eats it way further into the concrete cross-section as the duration of the fire progresses.
- At higher temperatures (400 to 600 °C), chemical transformations occur in the case of various minerals in the concrete aggregates. Water and/or gas separations can be the result. This leads to an increase in volume (e.g. quartz transformation, quartz leap). The spalling mechanisms that were previously described can be strongly supported depending on the nature and size of the aggregate grain.
- Temperature-related internal and constraining stresses can also lead to concrete spallings.
- Reinforcements, which are located merely a few centimeters beneath the surface, are exposed by the above described spallings and completely lose their bearing capacity owing to the extremely high temperatures in the first zone. Thus temperatures in excess of 300 °C should be avoided in order not to affect the steel's bearing capacity

considerably. The fire disasters over the past few years have shown that fires in tunnels represent high risks. The users and the rescue services are endangered by heat, smoke and concrete spallings of the tunnel lining. In addition the bearing structure is exposed to particular dangers on account of high temperatures and possible spallings. Constructional measures against concrete spalling are of great importance beside constantly exposed. The damage mechanisms that have been described can last over a lengthy period of time. For the special case of a tunnel fire the spalling effect starts with the steep temperature rise after about 5 minutes from the beginning of the fire event. Spalling usually takes place within the first 20 minutes after the fire has started. But also as the permanent tunnel lining have cooled down, further concrete parts can loosen and subsequently fall down. Thus concrete spallings could endanger emergency services during the rescue phase as well as people carrying out reconstruction works.

Public awareness of the consequences of fire in road tunnels was raised by the recent series of major incidents involving significant loss to human life. In particular, the fires in the alpin road tunnels at Mont Blanc and Tauern in 1999, Gotthard in 2001, and a subway fire in Daegu in 2003 resulted in total of nearly 200 deaths.

Vehicle fires start for a variety of reasons, in passenger cars the most common reason is an electrical fault, in heavy goods vehicles (HGVs) the most common cause is the brakes overheating on a long downward slope [1]. Fires may also start as a result of a collision. There does not seem to be any statistical evidence that fires occur more or less frequently in tunnels than in the open air, however any fires that do occur in tunnels do tend to have more serious consequences. On the 24th of March 1999 a HGV travelling through the 11km long Mont Blanc tunnel from France to Italy caught fire, possibly due to the engine overheating. This HGV stopped 6km into the tunnel when the driver became aware of the fire; he was unable to put it out and fled, on foot, towards Italy. Within minutes the tunnel operators were aware of the fire and prevented further vehicles from entering the tunnel, however, 18 HGVs, 9 cars, a van and a motorcycle had entered the tunnel from France after the first HGV and before the tunnel was closed. Of these 29 vehicles, four HGVs managed to pass the burning HGV and travel on towards Italy in safety, the other 25 vehicles became trapped in the smoke and eventually became involved in the fire. Nobody in any of these vehicles survived. Due to the prevailing wind direction (from the south) and the different ventilation regimes at either end of the tunnel (all ventilation ducts at the Italian end were set to supply fresh air, whereas at the French end some ducts were set to supply and some to exhaust) virtually all the smoke from the fire was carried towardsFrance, and as the airflow velocity was more than 1 ms-1, the smoke did not remain stratifiedA; within minutes there was no fresh air in the tunnel downstream of the fire. The fire grew to involve the 25 vehicles behind the first HGV, 8 HGVs which had been abandoned by their drivers travelling from Italy to France (the nearest one being some The 1ms-1 airflow criterion is a commonly applied 'rule of thumb' regarding smoke stratification. 290m from the initial HGV fire), and the first fire-fighting vehicle which entered the tunnel from the French side (which was almost half a kilometer from the nearest vehicle on fire). It is unclear how the fire managed to spread such distances, although explanations such as backdraught, burning liquid fuels and the involvement of pavement materials in the fire have been proposed. At the height of the

fire the blaze was estimated to have been about 190MW in size with temperatures in the tunnel exceeding 1000°C. The fire took 53 hours to extinguish and "hot spots" were still being dealt with after five days. 38 tunnel users and one fire-fighter died as a result of the fire, in their vehicles, two in an emergency shelter (designed to protect life in the event of a fire) and the rest on the roadway trying to reach the French portal. This was the greatest loss of life in any road tunnel fire. The incident in the Mont Blanc tunnel was the 18th HGV fire recorded in the tunnel. since it opened in 1965. Of the other 17 incidents most were minor and only five required the intervention of the fire brigade; none of these incidents resulted in any fatalities.

The fire in the Mont Blanc tunnel became a tragedy due to a combination of factors including the weather conditions, the different ventilation regimes at either end of the tunnel and the highly flammable nature of the trailer (insulated with polyurethane foam) and its cargo (margarine and flour) on the initial HGV.
There have of course been many other fire incidents in vehicle tunnels. A comprehensive list of tunnel fire incidents is presented in Appendix B. The majority of fires in road tunnels which have led to fatalities or significant destruction of vehicles seem to be due to collisions or vehicles shedding their loads. Two more road tunnel fires deserve further comment.

On the 7th of April 1982 a collision in the Caldecott tunnel, Oakland, USA came about when a passenger car, driven by a drunk driver, collided with the roadside barrier (raised walkway) and came to an abrupt halt. The stationary car was struck by a petrol tanker and subsequently the tanker was struck by a bus, causing the tanker to turn over, partially rupturing and spilling some of its load. This soon ignited and the blaze grew to involve the tanker, the car and four other vehicles in the tunnel. Seven people were killed. Although some of the petrol spilled out of the tanker, it appears that a large quantity of the fuel remained in the tank. Once the fire had reached a sufficient temperature to melt the aluminium walls of the tanker, the "top" of the tanker (i.e. the side that was uppermost after the crash) collapsed creating a large, deep pool of petrol which ignited and burned fiercely for over two hours until fire-fighters were able to extinguish it.
On the 11th of July 1979 a collision in the Nihonzaka tunnel, near Yaizu City, Japan, resulted in a fire which destroyed 173 vehicles. However, the seven fatalities which occurred during the incident were all as a result of the crash, not as a result of the fire; over two hundred people escaped the tunnel on foot before the fire established itself. The Nihonzaka tunnel is unique amongst those described here, in that it had a spray system to suppress fires. This automatic system began sprinkling the tunnel only eleven minutes after the crash, and this successfully suppressed fire growth for about half an hour – long enough for all the people in the 2km long tunnel to walk out. After this time, however, the unburned fuel vapours reignited and the fire established itself once more. One hour later the sprinkler reservoirs ran dry and the fire grew dramatically. It was two days before the blaze was "under control" and a further five days before it was extinguished. A quick survey of fires in tunnels suggests that large scale fires in tunnels may be becoming more frequent (the majority of large fires in tunnels have occurred in the past 20 years), this is probably due to the increasing rate of tunnel construction and

use; there are far more tunnels in use today than there were twenty years ago, and these tunnels are far longer and carry a much higher density of traffic than before. To try to ensure that the number of large scale tunnel fire incidents doe snot increase at the same rate as our use of tunnels, modern tunnels incorporate
sophisticated fire detectors, suppression systems and ventilation systems to control and restrict fire spread.

Tunnels have had ventilation systems in them for many years, but it is only relatively recently that the ventilation systems have been seen as a fire safety measure. The earliest ventilation systems were simply vertical shafts cut through the ground above the tunnel. These provided some fresh air in the tunnel by means of the chimney effect; the air in the tunnel (particularly if it was a steam train tunnel) would generally be warmer than the air outside, so this warm air would rise up the shafts and fresh, cold air would be gently pulled in the tunnel portals. This system of course does not work for tunnels which go under obstacles like rivers, rather than through obstacles like hills, so when these tunnels became commonplace, mechanical ventilation systems were installed in some tunnels for the first time

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The mechanical ventilation technology was originally developed for use in underground mines, and was adapted, with only minor changes, to be used in tunnels. The purpose of this ventilation was to supply fresh air through the tunnel and to disperse pollutants such as smoke and steam from trains. The ventilation system was not considered to be a fire safety device. Indeed the first interaction between fires and ventilation systems that was considered was the "throttling" effect of a fire on the ventilation. If there is a fire in part of a network of mine tunnels, it has the effect of restricting the airflow through that part of the tunnel, equivalent to replacing that part of the tunnel with a tunnel of smaller dimensions, or effectively constricting or "throttling" the tunnel . The idea that a

FigureBacklayering (also known as "back-flow") is the name given to the phenomenon when
smoke from a fire is observed to move against the direction of the airflow in the tunnel, see Figure 1.04. Eisner & Smith proposed that it is essential for fire fighters to be able to get to within 11-14m of a fire in a tunnel in order to effectively attack the fire. In practical terms this means that backlayering must be prevented or sufficiently controlled. The ventilation velocity required to prevent backlayering is known as the "critical velocity" (designated *Ucr*) and various different methods have been proposed for calculating it over the years. The first relationships to be proposed seem to hold for small fire sizes, but become unreliable for larger fires. Critical velocity varies not only with fire size but also with tunnel size and shape; Wu *et al.* have demonstrated that it varies with the mean hydraulic diameter of the tunnel (the ratio of four times the perimeter of the tunnel cross-section to its area) and not with any other characteristic dimension of the system (e.g. tunnel height). It should be noted that "critical velocity" is the airflow velocity required to prevent *all* backlayering. Smaller airflow velocities may be able to "hold" backlayering to a fixed length (designated *L* in Figure 1.04) upstream of the fire; if backlayering is held at less than 11-14m from the fire then Eisner & Smith's criterion has been met using less ventilation than the

critical velocity.
There are no international standards for ventilation flow in vehicle tunnels. Many countries do not even have national standards. In a recent study of national approaches, it was found that those countries that do have a recommended airflow for smoke control in vehicle tunnels recommend that a ventilation velocity of 3ms-1 should be maintained in the vicinity of the fire for evacuation purposes. However, this recommendation does not take into account the effect of the ventilation systems on the severity of the fire itself, the question that will be addressed in Chapter 4, and following, of this thesis.
10The use of sprinklers (or "deluge systems" as they are frequently referred to today) in tunnels remains a topic of much debate. Those in favour tend to argue that the sprinklers will protect the tunnel and allow the occupants time to escape. Those against hold that the sprinklers will probably not extinguish a vehicle fire (e.g. if a car is on fire the water will not get inside the car, it will merely cool the outer shell), that they will not deal with combustible vapours which will probably ignite at some later stage and that in some instances where a pool of liquid fuel is on fire they may cause an explosion. Some countries require that sprinklers are installed although they are not generally recommended for use in road tunnels. The world road association (PIARC) report on "Fire and Smoke Control in Road Tunnels" .summarises its recommendations with the following:
"No European country uses sprinklers on a regular basis. In some tunnels in Europe sprinklers have been used for special purposes. In Japan some sprinklers are used in tunnels with important length or traffic to cool down vehicles on fire. In the United States only a few tunnels carrying hazardous
11
cargo have some form of sprinkler. The reason why most countries do not use sprinklers in tunnels is that most fires start in the motor room (engine compartment) *or the* [passenger] *compartment, and sprinklers are of no use until the fire is open.* [...] *Experiences from Japan show that sprinklers are effective in cooling down the area round a fire, so that fire fighting can be more effective.*
However, the use of sprinklers raises a number of problems which are summarised in the following points:
- *Water can cause explosion in petrol and other chemical substances if not combined with appropriate additives.*
- *There is a risk that the fire is extinguished but flammable gases are still produced and may cause an explosion.*
- *Vaporised steam can hurt people.*
- *The efficiency is low for fires inside vehicles.*
- *The smoke layer is cooled down and de-stratified, so that it will cover the whole tunnel.*
- *Maintenance can be costly.*
- *Sprinklers are difficult to handle manually.*
- *Visibility is reduced.*

The effects of even small fires in a confined space like a tunnel are extremely serious due to an inability for gases and heat to disperse. For instance carbon monoxide is highly

toxic at very low concentrations, having this trapped in a confined space would allow concentrations to build well beyond a fatal level.

It is not long ago that diesel engines were regarded as being safer, cleaner alternatives to the petrol engine and the 'smoke' was thought of as a minor irritant, important because it was unsightly, smelly and reduced visibility in tunnels.

Modern medical science has clearly shown that this is not the case and that diesel exhaust is one of the most dangerous and widespread of modern pollutants. All of the exact mechanisms by which diesel exhaust causes harm are not yet known but it is clear that the harmful effects are related both to the size and composition of the particles in the exhaust.

In 2000, the respected New England Journal of Medicine [342.pp406-13] listed the following health impacts from particulate air pollution

- Rhinitis and laryngitisLarge particles are deposited in the nose, pharynx, and larynx.
- Tracheitis, bronchitis and bronchiolitisParticles larger than 10μ cleared by cilia. Smaller particles and fibers deposited in bronchioles and alveola ducts.
- Asthma and chronic obstructive pulmonary disease. Allergens and irritants are deposited in large airways causing chronic inflammatory changes
- CancerCarcinogens (asbestos and polycyclic aromatic hydrocarbons) come into contact with bronchial epithelial cells, causing mutations on proto-oncogenes and tumour-suppressor genes and leading to malignant transformation.
- Interstitial diseaseSmall particles and fibres are deposited in terminal bronchioles and alveoli. Penetration of interstitium results in fibrosis and formation of granulomas.

All particles are dangerous and there is no safe level of exposure, but weight for weight, toxicity appears to double with each halving in the diameter of the particles inhaled. "Nano' particles less than about 100 nanometers in diameter severely irritate the lung, irrespective of their composition and can carry adsorbed toxins directly into lung tissues, easily penetrating cellular membranes.

Particulate pollution has been labelled as the 'new asbestos' for its ability to cause serious illness and death. In many cases, actions to reduce the mass of diesel emissions (the EURO design rules) have led to a reduction in the size of particles and a significant increase in the number of particles emitted, and the potential harm.! Diesel exhaust contains up to 100 times more ultra-fine and 'nano' particles than does exhaust from petrol engines. In addition, diesel exhaust is now known to be a carcinogen. The California OEHHA lists 'Diesel exhaust' is an Toxic Air Contaminant (TAC) with a

Cancer Inhalation Risk (increased risk per $\mu g/m^3$) of $(3 \times 10^{-4}\ \mu g/m^3)^{-1}$over 70 years (300 deaths per million per $1 \mu g/m^3$ increased exposure). Comparable risks are Benzene $(2.9 \times 10^{-5}\ \mu g/m^3)^{-1}$ and 1,3

Over 300 papers on the health effects of fine particles and vehicle emissions have been published in the last 10 years.

- In 1993 Dockery and Pope published the findings of their '6 cities' study which clearly associated increases in particulate matter with increases in mortality and hospital admissions.
- In 2001, Friedman and Powell showed that the reduction in vehicle emissions during the Atlanta Olympic Games significantly reduced childhood asthma attacks.
- In 2004 Ann Peters (*et al*) published highly significant research which showed that short term exposure to vehicle pollutants could trigger the onset of myocardial infarctions (heart attacks).
- In 2009, Dockery and Pope published the results of a study a study covering 51 US cities showing significant benefits from the reduction of exposure to fine particulate matter (PM2.5)

These are just landmarks in the steady progress of medical knowledge showing the adverse impacts of vehicle pollution and especially particulate pollution on all stages of the human life cycle, from before birth[, through childhood and early adulthood to the causation of early mortality.

By strictly regulating emissions from vehicles and a series of other measures, Tokyo reduced ambient particle levels by more than 50% between 1975 and 1998 (from $>100\mu g/m^3$ in 1975 to $< 45\mu g/m^3$ in1998) . The economic benefits of this reduction, mainly by its impact on health costs and including the value of wages not lost, has been estimated to have totalled $$US30 BILLION up to 1999.

In 2008 the National Health and Medical Research Council found: *'No clear evidence exists to show that monitoring such as that carried out to assess compliance with air-quality goals, especially for PM10, can reliably predict the size, nature and course of adverse health impacts."* This is a matter for significant concern as the whole logic of current regulation, which is based on gravimetric measurement ($\mu g/m^3$), assumes that such a prediction can be made.

Particles in vehicle emissions consist mainly of carbon but also include fibers, metal fragments and soluble salts. The particles carry carcinogenic polycyclic aromatic hydrocarbons (PAH) and other volatile, and also carcinogenic, organic compounds (VOC) on their surface.

Diesel particles, which are mainly less than 1 μ (micron) in diameter and have an median diameter of about 0.2 μ (200 nanometers), are by far the most dangerous of the commonly found particles.

We are exposed to these pollutants at high concentrations in our cars or beside busy roads. They occur at high concentrations in tunnel and stack exhaust. Every time we travel through an unfiltered urban tunnel our exposure jumps 10 fold. No systematic monitoring is carried out anywhere which directly measures and assesses these most harmful particles. In 2008, the federal government released a report, which found: "Accrued effects from repeated tunnel use might include small increases in lifetime risk of cancer, and potential for increased bronchitic events or respiratory infection."

The Panama Canal is being widened to allow passage of large container ships. The Canal widening project is scheduled for completion in April 2014. Once the wider canal is open, container ships from the Far East will have passage to US portson the east coast. Significant revenue and jobs related to moving freight through the Ports of Los Angeles and Long Beach, the Union Pacific Railroad (UP), and the Burlington Northern Santa Fe Railroad (BNSF) will leave Southern California unless there is a significant improvement in the Ports' efficiency and cost competitiveness. Both UP and BNSF have planned $0.5B container transfer facility upgrades, and the Ports have planned $1.5B upgrades, but these efficiency improvements are limited and the upgrades will not result in lower pollution levels. These upgrades are being fought by environmental groups concerned about negative public health impacts, including increased smog, greenhouse gases, water pollution from construction and highway runoff, and the impacts on wildlife. These upgrades do not reduce the "golden mile" operating cost of container delivery from ship to Port gate.
In an effort to improve local freight movement to and from the Ports, Caltrans has proposed to widen the southern part of I-710 at an estimated cost of $6.8B. This project would require destruction of numerous homes and private properties to secure the proposed expanded right of way. Caltrans has also proposed to build a toll tunnel in the San Gabriel Valley to extend I-710 to I-210. Cost estimates for tunnel construction have ranged between $6B - $14B. Both of these projects will increase local pollution levels and are strongly opposed by environmental groups. GRID is a solution that merges economic imperatives with environmental concerns.

It's called the "Empty/Loaded Container Storage and Transfer Center", or ECSTC. This facility converts the space under shipping cranes into a computerized storage facility for empty and loaded containers. Containers are moved to and from ships directly into the ECSTC. Full-length trains drive under or adjacent to the ECSTC to be loaded or unloaded within the Port, so there is no intermediate shuffling of containers to off-site container transfer facilities to assemble trains for transport beyond Southern California. Use of the ECSTC could reduce unloading and reloading time for cross-country trains from 36 to less than 2 hours, at a lower total cost than today's port facilities.To optimize movement of containers to and from Southern California and minimize pollution, an underground powered rail "container conveyor" freight pipeline is proposed to run from the ECSTC to inland rail hubs connected to existing warehousing and trans-loading areas of the Inland Empire, central California and beyond. This pipeline would move containers using clean electricity, drastically reducing diesel fume emissions and freeing

up large sections of currently truck-bound highway for commuter use.. The San Gabriel River bed is the ideal right-ofway location for an unobstructed "container conveyor" freight pipeline. Excavation of the river concurrently provides the opportunity for underground installation of electrical conduit so that the urban blight of high-voltage transmission towers are dismantled and removed along the river. The thousands of acres currently occupied by power line rights-of-way will be made available for massive urban renewal. Pipelines can be included to carry desalinated water to the Inland Empire and for mitigation of storm water flows that are currently the cause of downstream pollution.

GRID modernizes ship-to-rail port operations and uses underground pipeline for container cargo movement, water and power. GRID transforms the San Gabriel River flood control channel into environmentally sustainable neighborhoods, protected green space and a light-rail transportation corridor.. Following these constructions, the San Gabriel River will be rehabilitated from a boulder-lined ditch to eco-friendly housing villages connected by a greenbelt of walkways, bikeways and parks. Clustered, affordable housing with pedestrian-friendly streets creates livable neighborhoods, reduces dependence on the automobile, lowers infrastructure cost and allows for aesthetically pleasing, protected open spaces.

GRID will slash diesel emissions and substantially relieve highway congestion. Construction of GRID will not block or hinder any existing traffic routes. GRID will save port and transportation jobs that would otherwise be lost to Panama, and create thousands of new opportunities. Approval of GRID will obviate the need for each railroad's independent new container transfer facilities, the other Ports upgrades, the widening of I-710, and the tunnel for the northern section of I-710. The $15B to $23B estimated cost for those projects can be applied as funding for a Public-Private Partnership for GRID. Total cost for GRID is as economically feasible as existing proposals that expand and exacerbate the problems they attempt to resolve.

The 710 Freeway is a 50-year old transportation policy that fails to consider how the economy, workforce habits and transportation needs have all dramatically changed. In 2005, the Federal Highway Administration decertified the environmental impact report for the surface route and rescinded the record of decision, essentially deleting the freeway from the federal highway program.

It became clear that project proponents were embarking on a severely flawed process of evaluating the feasibility of a tunnel as an option to a surface freeway. I have personally been misled on numerous occasions by proponents of the tunnel. The long-promised comprehensive feasibility study has never been completed and each faulty study has been followed by promises that the community's questions will be answered in the next study. To date, no one can tell you how much the project will cost and how many cars and trucks will use it. An average citizen would not choose to build an addition to his home without first knowing how many square feet he was building and how much it would cost. Yet, MTA and Caltrans are determined to march toward the tunnel without the answer to these two basic questions.

I have lost any trust that the pro-tunnel machine will be objective, or willing to provide appropriate answers to appropriate questions in the tunnel debate. There have been several efforts to utilize Sacramento in order to usurp the local process, most recently through a senate bill that sought to declare the tunnel as the preferred alternative to the gap closure. Recently, I brought my questions to the state transportation commission and, for the first time, felt that my concerns were considered. Our current city council has been doing an excellent job of collaborating with other freeway opponents and our mayors have attended many regional meetings, asking tough questions that search for answers. Many of those questions remain unanswered by tunnel proponents. There is also a renewed sense of urgency by our residents who have joined activists from surrounding communities in strong opposition to the 710. These efforts do make a difference. Writing to Chair James Earp of the California Transportation Commission, Chair Don Knabe of the MTA or Director Cindy McKim of Caltrans to share your views would be very helpful in our efforts to stop the 710.

There are some who believe that we should embrace the tunnel and trade a formal deletion of the surface route in exchange. The thinking seems to be that the tunnel will sink under its own financial weight and never get built. I disagree with this theory. I believe the tunnel proponents are serious in their desire to complete the tunnel, and that anything that we do to help it along will make increased traffic on the 210 much more likely. A freeway tunnel in today's Los Angeles County is outdated and unnecessary. Modern transportation planners are reintroducing mass transit and alternative methods of moving goods. The cost of a tunnel option will be astronomical and since no traffic analysis has been undertaken in consideration of today's traffic patterns, there is no guarantee that a tunnel will provide the congestion and air-quality relief that would justify such an amount of money. Meanwhile, there are a number of other contemporary transportation projects that can be completed for a fraction of the tunnel's cost.

This is an outmoded, shortsighted plan on its way to becoming a train wreck. Decades of construction and billions of dollars must not be wasted on a project that does not solve a transportation problem and is unnecessary in our region. I am honored to stand with those who continue to issue a clarion call for modern 21st-century solutions that address our congestion and air-quality issues, developed in a transparent and open process, that truly considers the input and well-being of all stakeholders throughout our communities.

Searching for ways to reduce air pollution and highway congestion, local harbor officials might resort to so-called maglev trains to haul cargo containers to and from the Los Angeles and Long Beach ports — the first freight application of the technology anywhere in the world.

Now under study at Cal State Long Beach are three maglev proposals to shuttle cargo to rail yards in Los Angeles and to inland distribution centers in Victorville and Beaumont. In the months ahead, the Southern California Assn. of Governments and the ports of Los Angeles and Long Beach are planning to launch their own feasibility studies of the technology.

Maglev, or magnetic levitation, trains produce no air pollution along their routes and are powered by magnetic fields in guideways that pull them along at speeds up to 300 mph.

So far, two systems have been built for commercial passenger service in China and Japan. Adapted for freight, researchers say, maglev trains could do the work of thousands of trucks and conventional locomotives, cutting harmful emissions in the port area and alleviating congestion on rail and highway corridors that serve the nation's largest harbor complex.

"If we are going to get serious about cleaning up the port, we need to bring electric power into the transportation system. We need to be emission free if we are going to grow," said S. David Freeman, president of the Los Angeles Harbor Commission. "Maglev is one of several options we are looking at. It has a lot going for it."

The search for new technologies became more imperative on Nov. 20 when the ports of Los Angeles and Long Beach approved a $2-billion plan to transform the harbor into a clean-air model for seaports worldwide.

To achieve that goal, many proposals are being considered, including alternative rail systems, emissions controls and low-sulfur fuels for trucks, heavy equipment, locomotives and cargo ships.

But cleaning the air and keeping the cargo moving will be a monumental task. By 2030, the ports of Los Angeles and Long Beach are expected to handle the equivalent of 21 million, 40-foot cargo containers annually — triple today's volume.

Truck trips on the Long Beach Freeway are expected to increase from 40,000 a day to more than 90,000 in the next 25 years.

Demand for freight rail service is also expected to more than double, choking the existing track network in Southern California. Congested corridors already are delaying freight trains going into and out of the region.

"Just widening roads is not going to cut it," said Sam Gurol, director of maglev systems for General Atomics in San Diego, which is developing a system for cargo containers.

General Atomics is participating in a study of maglev systems by the Center for the Commercial Deployment of Transportation Technologies at Cal State Long Beach.

Researchers are evaluating a 4.7-mile system between Terminal Island in the Port of Los Angeles and the proposed Southern California International Gateway, a rail terminal to the north. The line would cost about $575 million to build and $9.2 million a year to operate.

Also under study is a 20-mile, $2.4-billion line along the Long Beach Freeway, and a 100-mile network that would connect the port to distribution hubs in Victorville and Beaumont. The estimated cost is about $8.5 billion.

Capable of traveling 90 mph, the trains would run on elevated guideways built in highway medians or along utility rights of way.

Spurs would extend from the main line to port terminals where heavy equipment would shuttle containers from ships and storage yards to maglev cars.

At their destinations, similar methods would be used to transfer the containers to trucks and trains.

Researchers say maglev freight systems are becoming economically attractive because of the need to reduce air pollution and the high cost of building highways and conventional rail lines.

At roughly $100 million a mile, the cost of building a maglev system for cargo is approaching that of building a mile of freeway in urban areas.

It is also cheaper than the $200 million a mile required for maglev passenger trains — an

enormous cost that has often been an impediment to commercial projects.
After almost a half century of research in Europe and Asia, Japan and China have built the only two maglev passenger lines in the world.
If the freight system is built, the Cal State Long Beach study indicates that moving containers by maglev would cost considerably less than by trucks or conventional trains. The estimated savings ranges from 25% to 50%.
"This technology is coming. No doubt about it. The costs are coming down," said Steven Hinds, program administrator for the Cal State Long Beach research center.
Officials at the Southern California Assn. of Governments, a regional planning agency, say, however, that the Cal State study may have overstated the economic feasibility of the maglev system by underestimating the costs of moving cargo at port terminals and rail yards.
Danny Wu, the manager of SCAG's goods movement program, said association officials discussed the Cal State Long Beach study about six months ago.
"We felt they did not consider all the complexities of the logistics chain," Wu said. "They underestimated the costs, which goes to feasibility."
Gurol said the research team would welcome input from other agencies interested in maglev because some factors could have been overlooked for the study.
"This is a new way of moving shipping containers," Gurol said. "Even when you go talk to the ports, there are many questions they can't answer about moving cargo."
Some of the issues, SCAG officials say, will be addressed in future studies planned by the ports and SCAG, as well as the environmental review for improvements proposed for the Long Beach Freeway.
"We still need to do the assessments," said Philip Law, manager of SCAG's transportation corridor program. "What makes maglev attractive are zero emissions and electric power, which gives it an advantage over diesel trucks. But it's pretty expensive, and how to get containers from ships to the trains needs to be worked out."
The prosperous development of the Port of Rotterdam is reflected in the growth of container transportation which in 2007 surpassed the European record number of 10 million TEU. The 12% growth in 2007 fits to a trend that predicts that by the year 2020 the enormous amount of 15,9 million TEU will be transported. A large portion of this expected growth comes from Post-Panamax vessels delivering their containers at the deep sea terminals of Maasvlakte II. Looking at the capacity of the infrastructure this large influx most likely will result in a total block of the road system, especially for highway A15, despite the various measures that have been planned and already are undertaken to enlarge the capacity of waterways, railways and roads. For that reason chairman Van Sluis of Deltalinqs, the leading group of harbour entrepreneurs, stated that unorthodox measures will be needed to counteract the forthcoming complete blockage of the A15 highway. Currently already heavy congestion problems occur on the road system of the Rhinemond area, where even minor incidents on the heavy occupied roads cause massive traffic jams.These are the signs of a transportation system that is already stressed to its limits. Another congestion problem occurs at the entrances to the terminals where truck drivers queue in long lines, because there is a lack in capacity for container handling. This results in great financial losses to the transportation companies that have to stick to ever tighter agreements for 'on time delivery', paying penalties for being overdue. Along with growing economic activity and increased congestion comes

extra consumption of fossil fuel and extra emissions of air pollutants. This pollution adds up to already present difficulties with air quality. Frequently peaks of bad air quality in the harbour area occur because many local and regional emission sources contribute to it, like ships, refineries, cars and trucks, but also because considerable background pollution can periodically be present. The Rhinemond area is situated amidst the large industrial regions of North-Western Europe, so winds out of many directions bring in air pollution. This can clearly been seen on satellite images. It is obvious that drastic measures must be taken in order to restore and maintain healthy conditions and to counter the accelerating climate change we now witness. The current approach of gradual improvement of existing transportation systems by far fails to do so. Despite some effective Dutch policy measures taken, like the encouragement for cardrivers to place soot filters, and stimulation of modal shift towards transportation by barge or train instead of truck, the growing volume of heavy cars, trucks and ships results in total emissions rising rather than falling. Adding up to what already is (extra) produced in the industrial harbour environment. Therefore new measures leading towards a drastic modal shift are needed, that must be based on the cleanest and most sustainable technology. This implicates this technology has to comply to the following criteria: - being feasible, - cheap to develop and operate, - a high degree of emission reduction, - the highest degree of reliability and safety. The best available technique for that cause is discussed in chapter 3. Because it has to fit perfectly with the regional characteristics, these are discussed first in the next chapter. The transition to a new inherent clean transportation system is not a voluntary choice, but rather an urgently needed step, fitting into a world-wide scheme of measures that must to taken, in order to ensure that a cleaner and safer world is passed onto future generations.

The development of the desired new sustainable logistic chains, that can operate flawlessly in combination with current conventional ones, must be rooted in a clear geo-economic vision on how the region and its trade routes shall evolve in time. So first the characteristics of the Rhinemond region and its future prospects are discussed:
The Be(lgium)Ne(therlands)Lux(emburg) nations serve as major gateways to Europe. Traditionally because of the presence of an extensive river and canal system, that reaches to the German hinterland and beyond. So it comes to no surprise that in 2007 the Netherlands ranked third in the European export ranking. Total export movement of the Netherlands and Germany (the nr. 1) together amounts the huge value of 1400 billion (miljard) euros. Half of Dutch export is throughput (200 billion euros) which puts tremendous pressure on the infrastructure. Notwithstanding the fact that the Netherlands has an extensive road system, the large amounts of cars and trucks cause frequent total block situations on a nationwide scale. The OESO recommended in 2007 that drastic measures must be taken to improve the infrastructure, or else economic growth should diminish. That can be considered an understatement, as economic growth could even come to a full stop. Anyhow, growth around Rotterdam continues. New EU membership states boost up their economic activity, which leads to more export of products, part of which flows through Rotterdam. On the other hand there is a steady rise of Chinese goods pouring into the harbour. If connections to the hinterland can be improved in accordance and the transportation prices kept low, a promising future for the Netherlands lies ahead. It is expected that it will soon become the second ranking export nation in Europe,

surpassing France. There are three modes available for efficient handling of large volumes:
1) container shipment by barge, 2) short sea shipment, 3) train transportation, (possibly combined with intermodal transportation). In order to structurally improve the efficiency of the first mode many new inland terminals have already been established. In addition also the establishment of an inland 'container transfer' is now under consideration, the location of which will probably be to the East of Rotterdam in the Alblasserwaard, or to the South in the Moerdijk region. The second mode gains importance as new dedicated ships are being build.
The third mode however holds uncertain prospects. Much money has already been invested in a new electrified railway line, stretching 200 km Eastward to the German border, connecting to the European rail network, but whether this mode will be economic successful remains uncertain. Further improvements of the rail systems in the Dutch and European hinterland must be made. The following additions are in our view necessary:
a) Several new cross-border connections to the directions South, South-East (Belgium, France, Italy) and North-East (Scandinavia, Poland and the Baltic States).
b) Introduction of new intermodal types of transportation, like Roll-on Roll-off (to train),
c) New type of transfers established where truck drivers can put their containers on train, after which the containers will be transported fast and directly to their destination, and vice-versa. Requirements are 'just in time' and a fast 'point-to-point' delivery service.
Another type of transfer is needed in the harbour area itself. To free up valuable space on the
terminals at the seaside, off-loading containers to nearby inland rail container transfers will be a worthwhile solution. Trucks then won't need to enter the heavy congested roads of the harbour region itself and can pick up and deliver their containers at the transfers instead.

For this type of logistic solution a Maglev shuttle, yielding an uninterrupted 24-hour connection, is the ultimate technology. It will establish a dedicated, uninterrupted link between the terminal and the inland transfers for fast transportation of containers to and fro. In this way an "extended gateway" is created. The scientific and logistic justification of this concept is treated in the paper by Visser et al.(iii)

The recent introduction of various Maglev systems in America has brought about a major shift in appreciation of what can be achieved with land-based intermodal transportation. These systems have been developed to operate at very competitive prices. They are cheaper to build and operate than current rail or truck transportation. Because of the many new capabilities
they create, they will revolutionize the whole concept of harbour logistics.
Since containers can be transported individually and at higher speeds it gives rise to a completely new way of transportation, that can be structuraly developed into a grid system of point to point connections. The Maglev shuttle will serve as a central Hub to other systems. In a way it can be compared to the way the aorta in a human body serves other bodyparts. The second function however is that it also will operate as a highly feasible standalone solution for transporting badges of containers. The secret behind this

revolution are the special technological and economic characteristics of the latest Maglev systems, which are:
- little energy needed to lift even 40 feet container
- low construction costs for the tracks, vehicles and stations
- less energy needed in comparison to other fast modes of transportation for containers, so little energy costs
- a very high degree of reliability
- very low maintenance costs
- high frequency operation.

Along with these benefits come also great benefits for the environment. The low energy requirement gives way to a transportation system that can be completely fuelled by green energy, at virtually no extra cost. Since there are plenty sources of green energy available in the Port area, the system can feasible operate on locally produced green electricity, so it has no carbon footprint. Hence the dependence of fossil fuel will be abolished. There is also no air pollution and noise hindrance is abolished. So the benefits for the environment are huge.

The most appropriate Maglev systems currently are: 1) AMT, 2) Levx, 3) General Atomics. The solution of AMT is currently the most universal, versatile and cost-effective. It is created out of proven technology. The AMT maglev has a better energy performance at any given speed than a moving train.
A popular misunderstanding is the assumption on theoretical grounds that a steel wheel-tosteel system could have an advantage at speeds below 35 km/hr. In reality far more energy is required to overcome the inertia of a heavy weight on wheels, and keep that weight rolling, than a Maglev requires for the same performance. The energy required to lift to vehicle is proportionally small. In the preceding phase of acceleration the benefit of Maglev even gets greater. And when speed rises above 35 km/hr the Maglev's frictionless motion creates an extra energy advantage, increasing exponentially with speed. Translated into a numerical comparison a Maglev requires 1,8 KWh/km, versus a train 6 KWh/km. An energy saving of 70% ! The energy needed to lift the vehicle is comparably small. For instance at a cruising speed of 100 km/hr, this is 0,25 KWh/km. (i)

The energy saving is likewise substantial when Maglev is compared to truck transportation. For instance: a truck spends half of its fuel alone in overcoming the friction of the road. Whereas the AMT maglev operates on attracting magnets and a small gap is maintained between track and magnets by controlling electronics, the Levx technology operates on repulsion by permanent magnets and is self-correcting. Whilst the AMT maglev is perfectly suited to operate as a long 'conveyor belt' shuttling containers fast along the track depicted in the map above, the Levx solution could be worthwhile as an additional short conveyor belt at the front end, where containers are exchanged between the deep sea terminals and the main Maglev trajectory. While Levx suspension costs no energy, containers can – if necessary – be kept in wait states without energy loss. Also the components of this system can be completely sealed of, making them sturdier in the harsh harbour environment where salty winds could corrode electric components. (See fig. 2) With Levx a somewhat wider gap between magnets can be maintained, so an incidental overburden of weight will not directly lead to damaging

the track. The Levx-system could serve as a feedering system to the backbone structure that is provided by the AMT Maglev system. The combination of the two systems, which in practice will operate as one, will result in a 100% full proof system, with an estimated 99,999% uptime under operational conditions. The energy performance of this system can be in the same rangeof barge transportation! For short haul displacements (< 20 km) it possibly is the most energy efficient transportation system of the world! The performance of the system of General Atomics is mentioned in literature as also being worthwhile, but little conclusive evidence on that has been made public so far.

The Maglev Shuttle holds prospects for all key players in the harbour. For instance: Terminal operators (stevedores) will benefit greatly from its introduction in various ways:
- more throughput in the same time, because of a more flexible and reliable schedule. When large vessels like Post-Panamax ones are delayed because of weather conditions, the throughput could become stagnant as these ships get priority in handling. In that case the very fast shuttle makes it easier to maintain or readjust schedule. So more berthing slots can be given out;
- when too much containers get stacked, the shuttle will provide a very fast means to off-load containers to a nearby location, where they can be temporarily stacked, which frees up valuable harbour space;
- the shuttle system can be extended within the inspection and treatment zone on the terminal. Containers can be scanned for safety reason without truck drivers getting exposed to radiation;
- when a new tight American security rule will be introduced that containers must be 24 hours on the dockside before being shipped out, a fast shuttle system will become increasingly valuable;
- no longer queuing of truck vehicles at the gate of the terminal, and no delay in transfer of the containers to the long trains;
- energy costs can be brought down to zero. There is only a small amount of energy required to accelerate a container. After that, with the usual wind force of 6-8 Bf present at the seaside in the Rhinemond area it will maintain its speed by wind force alone for stretches of 10 km or maybe even longer. Upon braking all the released energy can then be stored and utilised to power the return stream of (mostly) empty containers.
- a significant lowering in operation and maintenance costs.
Transportation companies utilizing trucks will profit from: - abolishment of delay times; - newly created locations for offloading and unloading containers; - lower energy and financial costs for transportation; - a new Roll on, Roll off (to train) capability; - utilizing roa trains to and from the transfers, without hampering other traffic; - more flexibility in picking up return payload; - no hindrance because of tightening emission reduction regulations. Environmental groups and citizens will profit from: - the significant lowering of emissions otherwise caused by transportation, while a new zero emission system is introduced;
- increased levels of safety on roads. (Despite current measures and plans highway A15 will
to the writers opinion remain a lasting safety risk for car drivers, and a source of pollution and noise hindrance for the region), - the possibility to pledge for alteration of current

logistics into systems that form throughout Zero emission logistic chains. (Delivering a substantial short, mid, and long term contribution to the Rotterdam Carbon Reduction Program.) The Port Authority will benefit from the strong rise in capacity to handle containers, with the guarantee that future growth always can be accommodated. When the shuttle system is connected to that of adjacent harbours (Vlissingen, Moerdijk, Antwerp) the possibility of combining capacity is created. Another benefit is that this system creates a possibility to handle freight in the direction of the Brabant route, where no inland canals are present. The improvement of transport in this direction is very worthwhile as it can later be extended as a fast route of transporting goods to certain important German, France and Italian destinations.
The Municipality of Rotterdam will greatly benefit as well. When a new kind of logistics arises in the harbour with many nodes where containers can temporarily stop, many new workshops will be established in this region, where the contents of the containers is upgraded, before they are shipped through, resulting in many new jobs for the citizens. Further there is the future ability to converge the shuttle system with passenger service on the current subway. According to CEO Peters of the Rotterdam metro liner (RET) by 2040 the metro network will be doubled in length and by then be transformed in a Maglev system. Given the possibilities mentioned here this development could start now. Various examples of passenger service on proposed and already realised trajectories worldwide can be found on the internet. This enhances plans already under consideration to establish new stations were people and light goods will transfer. Connecting all the logistic systems together in this way will create a truly Metropolitan transportation system that is future proof in every aspect.

The Rotterdam harbour has all the possibilities to make a head start with creating a new logistic facility based on Maglev principles by which congestion is countered effectively and harmful emissions will be reduced in great amounts. It will yield not only an important stand alone facility that is capable of conveying large amounts of containers in short time, but will also serve as a backbone (aorta) for all other logistic transferring operations, enhancing the other systems possibilities and marketvalue. On the one hand it will streamline transportation in badges and in doing so it frees up valuable harbour area, but it will also create the possibility of a completely new kind of value-added logistic in which containers will be treated individually. For instance: the contents of containers can be conveyed between various nodes where the content is upgraded, before it is shipped through. This solution has all the capabilities to become one of the primary solutions in the Rotterdam harbour program to counter Climate Change. As since it can be copied by harbours worldwide, it could result in a worldwide transformation of logistic chains into zero emission ones. The development of this system can be paid for by private companies, that receive exploitation rights in return, or by utilizing carbon credits for it. Not only will carbon emissions be strongly reduced but all other pollutants as well, like fine dust particles, NOx and noice. The newest type of Maglev systems, by AMT and Levx, are cheap to realise and operate, rivaling all other current modes. Their energy demand can be as low as that of barge transportation. Since they need very little maintenance and have a very high degree of operational reliability, they are the most economic solution of all current land based system. On average all-in developments

costs are about 17 million dollar/mile. With this new type of logistic an important new possibility comes available for the municipality to reduce traffic in and around the city, as well as that many new job opportunities will be created in the harbour area. So in every aspect of the word, the Maglev shuttle yields a sustainable solution. For introduction of this solution a joint effort must be started, in which all key players in the harbour should participate. The initiative needs support in the initial stage by government policy. With measures like co-investment, fast granting of permits and rural planning in favourite of this new solution. The national government should support this by raising an interdisciplinary scientific working group that supports the introduction of EM applications in the Netherlands.
This group must pave the way for speeding up the introduction of sustainable innovation. As it is the best and fastest method to solve current congestion problems.

What is the Multi-Mode Low Build Alternative?It is a system of transportation improvements that upgrades city surface streets, enhances existing freeways, and encourages coordinated linkage between different travel modes: automobiles, light railway, buses, shuttles, and bicycles. It is designed to improve mobility within South Pasadena, Pasadena, Alhambra and El Sereno.

What would the Multi-Mode Low Build system do?· Extend the 710 freeway terminus to Mission Road for diffusion, reducing east-west traffic on Valley Boulevard and congestion on Fremont Avenue. · Add a 710 off-ramp at Cal State L.A.; add on and off-ramps to the 134 freeway at Pasadena and St. John's Avenues in Pasadena; add an on-ramp to the 110 freeway in South Pasadena at Fair Oaks Avenue and State Street. · Build bridges over the depressed railroad tracks in Alhambra, reconnecting north-south streets to relieve traffic congestion on Fremont Avenue. · Upgrade Figueroa Street to create a parallel corridor to the 110 between downtown L.A. and Pasadena. · Redirect traffic on Del Mar Avenue in Pasadena to Raymond Avenue and to Arroyo Parkway. · Reconfigure the Fremont Avenue-Huntington Drive-Fair Oaks Avenue connection in South Pasadena. · Synchronize traffic signals on Fair Oaks and Fremont Avenues for smoother moving traffic flow. · Improve intersections by providing more left-hand turn lanes and medians. · Implement traffic "calming" techniques to protect residential neighborhoods from traffic intrusion· Coordinate light railway, bus and shuttle schedules.

· It will save taxpayers an enormous amount of money, costing an estimated $135 million, about 1% of what the freeway tunnel would cost. · It will prevent increases in air and noise pollution. · It can be accomplished now; create jobs now. · It can solve the region's transportation problems now - not 20 years from now.

Forty years ago in my city, Milwaukee, highway designers planned to surround the central business district with an expressway that was to include a section along the shore of Lake Michigan. This section, which would have separated downtown from its waterfront, generated enough opposition to stop its construction. But more than half of the loop was built, including a half-mile stretch that crossed the Milwaukee River and separated the north side of downtown from the rest of downtown.

Milwaukee has done something that might seem astounding, perhaps even un-American, and that is to tear down a superhighway. Why? Because rebuilding the 30-year-old structure would have cost $100 million. Tearing it down and replacing it with a street cost about $25 million.

Property values near the structure were depressed. The elevated road blocked what would otherwise have been beautiful views on both sides of the Milwaukee River. Downtown Milwaukee had experienced a housing boom that had developers searching for sites. In 2000, the county, state, and city agreed to remove most of the half-mile long Park East Freeway and develop the land. The estimated property value increase has been over $250 million.

Rethinking Freeways

It may seem strange, tearing down expressways after 50 years of the greatest road building binge in world history, but we've been through this rethinking process before. Remember the U.S. Army Corps of Engineers? As it enters the 21st century, the Corps has already begun the process of undoing the damage many of its 20th century projects caused. In the Florida Everglades watershed, the Corps once drained marshes and forced streams into concrete-lined channels in an attempt to tame waterways and make more land available for agriculture and development. Now the Corps is ripping out concrete and restoring marshes.

Draining wetlands and channelizing streams not only damaged the environment, but increased the likelihood of pollution and flooding downstream. Marshes, meadows, swamps, grasslands, and bogs slow down and filter the water that flows through them. The Corps is learning to respect the natural benefits of wetlands. It is learning that forcing water into concrete-lined channels was foolish and counterproductive.

In a similar way, traffic engineers are learning that urban street grids can distribute urban traffic more efficiently than do superhighways.

"Widening roads to solve traffic congestion is like loosening your belt to cure obesity,"says Walter Kulash, a traffic engineer from Orlando, Fla. Kulash argues for more smaller streets and roads rather than huge limited-access interstate highways. He's for choice. He believes travelers should be offered options. Government should invest in streets, sidewalks, transit, and bike paths instead of devoting almost all of its tax money to huge, highly engineered expressways.

Traffic engineer Rick Chellman's research in Portsmouth, N.H., demonstrates that the urban street grid generates less than half the car trips of suburban development. Chellman measured travel on the sprawled edge of Portsmouth against travel in that city's traditional neighborhoods and found that people traveled less often and for shorter distances in old Portsmouth.

Yet federal highway programs still concentrate tax dollars on building giant grade-separated roads that cut through or around urban grids. Like the now discredited Corps of Engineers channelization projects, the Federal Highway Administration seeks to concentrate traffic on a few large roads. The concentrated traffic congeals into congestion and the system is overwhelmed, just as with the Corps water projects. Federal highway policy, like so many post-World War II federal programs, imposes gigantic and destructive intrusions on complex urban situations.

Traffic engineers and Corps officials haven't learned these lessons in isolation. Across the country and across many disciplines, people are re-evaluating post-World War II federal urban policies that had destructive effects on cities, despite their good intentions. This destructive legacy has five major ingredients:

- Federal welfare policy, which undermined city labor markets by paying people not to work and penalizing them if they did.

- Promulgation of model zoning codes that criminalized the mixed-use development patterns that were the norm in traditional American neighborhoods and main streets, replacing them with the now familiar pattern of sprawl: city housing, office, and retail separated into pods and sprawled across the land.

- The Federal Housing Authority created in 1934 helped popularize the low equity mortgage. FHA subsidized home ownership to millions of Americans - which was great, except that for many years FHA only subsidized newly constructed homes, meaning you couldn't use FHA to buy a house in your old neighborhood. FHA also required race segregation covenants until 1949 and allowed them until 1962.

- The urban renewal program subsidized wholesale demolition and clearance of urban neighborhoods. In 1945, many European cities were wastelands. Berlin, for example, was 80 percent destroyed at the end of the war. Thirty years later, London, Rotterdam, Berlin, and Hamburg were all rebuilt cities while U.S. cities looked as though World War II had happened in the United States.

- Welfare, zoning, FHA, and urban renewal all did their damage, but the most destructive program was the federal government's gross over-subsidy of high-speed roads that cut through the fabric of U.S. cities. The federal government paid 90 percent, states 10 percent, and locals 0 percent. This funding mix was so compelling that few cities opposed freeway construction in the early years of the program.

In 1956, the Interstate Highway Act was signed by President Dwight Eisenhower. Its chief Senate sponsor was Albert Gore Sr., but the man most responsible for its passage was Senate Majority Leader Lyndon Johnson, a powerful friend of the road building industry. It was Johnson who pushed hard for the dominant 90 percent federal cost share.

Interstate Highways In The City

Just before World War II, designer Norman Bel Geddes had proposed the idea of interstate highways to President Franklin Roosevelt. Bel Geddes had been impressed with the development of grade-separated limited access roads in Europe, particularly the German autobahn. He recommended the new roads for America with an important caution. In his 1940 book, Magic Motorways, he warned that a high-speed, non-stop thoroughfare would only bungle the job if it got tangled up with the city. Bel Geddes felt that a great motorway had no business cutting a wide swath right through a town or city and destroying the values there; its place was in the country.

Bel Geddes knew what European traffic engineers already knew, that high-speed roads would disrupt the efficient distribution of traffic on city street grids. That is why you won't find expressways inside the outer ring roads of most large European cities. London has a high speed motorway ringing its edge and motorways to other large cities such as Glasgow and Newcastle, but London has no high speed roads inside its beltway. Instead, London has boulevards and avenues across a dense network of streets, lanes, and alleys. Under the road grid is a huge complex of subways and commuter railroads. The edges of the boulevards and streets are lined with sidewalks, businesses, and housing. Transportation choice is a profound reality for those living in London. Walking, bicycling, riding transit, and driving cars are all options. Contrast that with the high-speed expressways of, let us say, metro Detroit, where every freeway ever planned was built and cars travel farther and farther between increasingly insignificant destinations.

My parents honeymooned in Detroit in 1946, guests of a grateful government that provided a week in a hotel to those who were POWs during World War II. My father, a Bataan Death March survivor, could choose between Minneapolis or Detroit. Since they lived in St. Paul, Minn., he chose Detroit.

They stayed at the luxurious Book Cadillac Hotel. With a new Bell and Howell movie camera my father recorded the first days of an enduring marriage and the heyday of downtown Detroit. At that time, Detroit bustled with pedestrians and shoppers in scenes reminiscent of the great cities of Europe. Three department stores - Hudsons, Kerns, and Crowleys - all on Cadillac Square, rivaled Manhattan's Bloomingdale's, Macy's, and Gimbel's. Detroit's prominent skyline was surpassed only by those of Chicago and New York.

Fifty years later, Detroit has changed beyond recognition. The pedestrians are gone. The streetcars, with the exception of a small, antique replica that operates occasionally, are gone. The department stores are gone. Most buildings are gone or boarded up. The 28-story Book Cadillac stands as part of the Detroit acropolis of empty skyscrapers.

If money is the measure, the federal government kept faith with Detroit during its decline. But if results matter, Washington's dollars were fool's gold. Billions flowed from Washington into Detroit in the form of concrete. Billions more built public housing in the city and tax-subsidized middle-class housing in the suburbs. More was spent on urban renewal and parking lots - so many parking lots that there are not many places left to visit.

Some may think Detroit, as an automobile city with a declining industrial base, is a special case. But compare Motor City with the Motowns of Europe: Wolfsburg, Germany; Goteborg, Sweden; Turin, Italy. Each has a healthy, vibrant downtown. Turin, especially, has endured the decision of a giant automaker to move production elsewhere. Yet the city thrives.

Deconstructing Freeways

In California, some expressways were built even before the Interstate Act. The California Highway Department had begun building San Francisco's Embarcadero Freeway in 1953. The department intended it to connect the Bay Bridge with the Golden Gate. The state assemblyman for the north of San Francisco at the time, Caspar Weinberger (later Ronald Reagan's defense secretary), opposed the freeway, saying it would block views of the Bay and lower property values. He lost the fight, but he and others slowed the project enough that 20 years later, Mayor Joseph Alioto was able to stop its completion from Fisherman's Wharf to the Golden Gate. Alioto saw no advantage to a high-speed road through San Francisco. He said the city was so beautiful that people should slow down and enjoy its charm. He noted that most of the great cities of Europe had no expressways cutting through them and that Paris, Vienna, Rome, and London seemed to be doing fine without them.

When the 1989 earthquake damaged the Embarcadero Freeway, it was considered an "act of God"and in one of the rare cases in which San Francisco's political culture embraced a divine message, the city petitioned the state of California to remove the Embarcadero Freeway instead of rebuilding it.

The state agreed and nearby property values promptly shot up by more than 300 percent, reinforcing Caspar Weinberger's argument of 40 years before. Today the Embarcadero is an at-grade boulevard with sidewalks and light rail transit in a median lined with royal palms. The boulevard and transit connect Fisherman's Wharf with the Giants' new baseball stadium. The most important views of San Francisco Bay from the North Coast of San Francisco are no longer obstructed by an elevated concrete expressway.

Neil Goldschmidt, Portland's mayor of a generation ago, led an effort to remove an elevated expressway separating its downtown from the banks of the Willamette River. The mayor and his allies argued that the quality of life and property values would improve if the road were removed and replaced with an avenue and a park. They won the argument, and their prediction came true. Property values are up dramatically, and the park along the river is now one of the most popular gathering spots in Oregon. Similarly, New York City removed the Westside Highway and has enjoyed huge development in the old freeway corridor.

San Francisco, Portland, New York, and Milwaukee all are deconstructing freeways. All four cities are undoing damage done to them, which points out one characteristic of Americans: We make huge mistakes, but we also correct them. We are replacing welfare with work; we're ending or redesigning federal housing programs; we're reversing the

destructive programs of the Corps of Engineers; and we're changing our attitudes about highways and transportation. Four cities have replaced expressways with avenues and boulevards. I predict this is just the beginning. With property values skyrocketing near demolished freeways, urban expressway deconstruction could be one of the biggest public works projects of the 21st century.

The first generation of freeways is approaching the end of its lifespan.

New York's West Side Highway began construction during 1920s and crumbled during the 1970s. The freeways built during the freeway building boom of the 1950s and 1960s have begun to obsolesce: many already need rebuilding and many more will need rebuilding during the next few decades. In general, the cost of rebuilding them will be more expensive than new freeway construction. As John Norquist has said, "governments around the country can't afford to rebuild the highway infrastructure without bankrupting their economy."

As freeways obsolesce, there will be political battles to decide what to do with each one - to rebuild it or to remove it.

By now, it should be clear that removal is the best alternative - and the only alternative that helps us deal with looming environmental problems such as global warming. We have seen that traffic engineers were wrong when to predict that freeway removals would lead to gridlock. We have seen that even in cities where there was strong political opposition, freeway removals turned out to be successful and popular after they were completed.

When we look at freeway spurs, parts of larger freeway plans that were never completed, it is obvious that removal is best. There is no significant impact on capacity of the total freeway network, and there are obvious benefits, because tearing down the freeway reclaims land for new development or parks and helps revive adjacent neighborhoods.

When these freeways run through downtowns, there are huge economic benefits to tearing them down. For example, we have seen that:

- Milwaukee spent $25 million to demolish the 1-mile-long Park East freeway, while it would have cost $100 million to rebuild that 30-year-old freeway. Removing the freeway opened 26 acres of land for new development, including the freeway right of way and surface parking lots around it, which have already attracted over $300 investment in new development, in addition to stimulating development in surrounding areas.

- San Francisco increased nearby property values by 300 percent by tearing down the Embarcadero Freeway and opening up the waterfront was opened up, stimulating the development of entire new neighborhoods.

Of course, it is more radical to tear down mainline freeways rather than just freeway spurs, because this reduces capacity on the entire freeway system. Nevertheless, cities are beginning to remove mainline freeways:

- Niagara Falls is removing the Robert Moses Parkway in order to slow people down and encourage them not to drive as far. Just as building this parkway encouraged tourists to take longer trips and drive right through to Niagara Falls, Canada, removing this parkway is meant to encourage tourists to take shorter trips and stop in Niagara Falls, New York.

- Paris is considering closing the Pompidou Expressway as one element of a larger plan to reduce automobile use by reclaiming land from the automobile. It is also converting traffic lanes on major streets to bus lanes, as part of the same plan.

- Seoul has removed the Cheonggye freeway and restored the river that it covered in order to stimulate the economic revival of central Seoul's Dongdaemun district. It has built busways to replace the freeway capacity, and it the goal of this plan is to reduce automobile use from 27.5 percent to 12 percent of all trips.

In the 21st century, it should become common to tear down mainline freeways to reduce automobile dependency, because this will be necessary to deal with global warming and other environmental challenges of the coming century..

It should be cleaar by now that it was a mistake to build urban freeways. Because they blighted the older neighborhoods that they sliced through and made it easier to commute from remote new suburbs, the freeways encouraged suburban sprawl - so they generated more traffic, which quickly filled the freeways beyond capacity. Freeways that were supposed to handle projected demand for decades became congested in just a few years, because of the traffic that they themselves generated.

This is what transportation planners call "induced demand." Building freeways encourages people to drive longer distances: in the short run, people begin to drive to regional malls rather than local stores, and in the longer run, they move to lower density neighborhoods where they have to drive further for all their trips.

One study found that, within five years after a major freeway is built in California, 95 percent of the new road capacity fills up with traffic that would not have existed if the freeway had not been built. Other studies in different places show different levels of induced demand, but they generally agree that, within a few years, more than half of the new capacity fills with traffic that would not have existed if the road had not been built.

In Great Britain, where there is a very active anti-freeway movement, transportation planners are no longer allowed to count reduced travel time as a benefit of building a new freeway. The Department of Transport has adopted a guidance document saying that cost-benefit studies on new freeways must assume that elasticity of demand may be as high as 1.0 with respect to speed - which means that average trip length increases as

much as speed increases, so building freeways and increasing speeds just lengthen trips and does not save any time.

When post-war American freeways generated sprawl and longer trips, transportation planners began to theorize that the average person budgets a constant amount of time for transportation, so that higher speeds just make people travel longer distances. This idea was first advanced by Yacov Zahavi of the U.S. Department of Transportation, who studied changed in travel patterns between 1958 and 1970 and found that people did not spend any less time traveling, though all the freeways built during that period let people travel faster.

Follow-up research confirmed his conclusions. It showed that the amount of time that Americans spend commuting to work has remained constant since the 1840s, when the move to the suburbs began as a reaction against the industrial revolution, though there have been vast changes in technology since then. The total amount of time that Americans budget to transportation also tends to remain constant, about 1.1 hours per day. As speeds have increased, suburbs have sprawled over more land, the malls have gotten bigger, and people have driven further to get to their jobs or go shopping.

If people have a constant time budget for transportation, we should expect that tearing down freeways and reducing speeds will reduce the distances that people travel. Just as building freeways and increasing speeds causes induced demand, removing freeways should cause reduced demand. This is sometimes called "traffic evaporation."

Studies have shown that reducing road capacity does reduce traffic - but not as dramatically as increasing capacity increases traffic.

In 1998, a comprehensive study of the issue was published. With funding from the city of London and British government, a team of researchers at University College, London, examined 60 cases where road capacity was taken away from cars, with examples from the UK, Germany, Switzerland, Italy, The Netherlands, Sweden, Norway, the USA, Canada, Tasmania and Japan. Often, there were predictions that reducing capacity would cause gridlock, but the researchers found that, though there was sometimes short-term disruption, there were no cases of long-term gridlock. Most drivers moved to parallel streets or changed their travel time to avoid congestion. Some drivers changed their mode of travel, changed where they carried out activities, or changed where they lived to avoid congestion. Overall, 14 to 25 percent of the traffic that had used the removed capacity simply disappeared, on the average.

In some cases, reductions were more dramatic than this average. In 1973, when New York city's West Side Highway collapsed, 53 percent of the traffic that had used that freeway simply disappeared. Presumably, traffic was reduced by such a large amount because people in the center of New York city have good transit alternatives and shopping within walking distance of their homes.

If only about 20 percent of traffic disappears on the average when we reduce road capacity, it is best to taking a more comprehensive approach to reducing traffic at the same time that we remove mainline freeways.

Two policies that can reduce traffic immediately, at the same time that freeways are removed, are:

- Businesses could be required to give employees commute allowances instead of free parking. Employees could use the allowance to pay for the parking they used to get for free, could use it to pay for transit, could keep part of the allowance if they car-pooled to work, or could keep the entire allowance if they walked or bicycled to work. It is estimated that this policy could reduce commuter traffic (and peak demand for road space) by about 20% immediately and by even more as better transit service is provided.

- As in London and Stockholm, drivers could be charged a fee for driving into the central business district at times when roads are congested. The revenues could be used to pay for better public transportation. This policy has been very successful where it has been tried, and the fee can be set at the level needed to reduce congestion to a manageable level. San Francisco is currently studying congestion pricing for its central business district.

In the long term, we need to rebuild our cities to make them less auto-dependent by promoting:

- Though states have had some flexibility to spend federal funding on either highways or transit since 1992, they still spend far more on new freeway capacity than on public transit: between 1992 and 2001, states spend 29% of federal highway funds on new freeway capacity and only 5% of these funds on public transit (with the bulk of the funding going to maintain existing roads). At the same time that we reduce freeway capacity, we need to provide transit alternatives - particularly transit on exclusive rights-of-way, which gives people a way to avoid traffic congestion.

- Today, most zoning requires developers to build at suburban densities, which are so low that they cannot support decent transit service or local shopping, so people have no choice but to drive. The new urbanists have developed zoning codes that allow developers to build more compact neighborhoods of single-family houses, with transit and shopping streets within walking distance. We need smart growth policies to these walkable neighborhood of single homes and denser neighborhoods of apartment buildings around transit nodes and corridors. In this way, we would gradually rebuild our freeway-oriented cities as transit- and pedestrian-oriented cities.

It is plausible that building freeways has such a strong effect in inducing traffic precisely because it has been supported by other public policies. Zoning has required low densities,

separate land uses, and abundant parking. Suburbanization was also jump-started by FHA loans, which initially were available only to buyers of only low-density suburban housing. Businesses virtually all provide free parking for customers and employees who drive, and nothing for people who use public transpotration or walk. These have been the policies during the era of freeway building, and they help to explain why freeways generated so much traffic.

Likewise, it is plausible that removing freeways has less effect in reducing traffic because it is not supported by other public policies. To make freeway removal more effective, we should zone to allow more compact neighborhoods, we should give federal loan guarantees to apartment buildings and mixed-use projects with housing above shopping as well as to single-family houses, and we should shift funding from new freeway capacity to new transit systems.

Today, the conventional wisdom among environmentalists focuses on two of the three things that we must do to rebuild our cities: shifting funding from new freeways to public transportation and zoning for pedestrian and transit-oriented development. But the conventional wisdom shies away from the third thing that we must do: reducing freeway capacity and slowing traffic.

Apparently, we still intimidated by the traffic engineers who say that reducing capacity will cause gridlock, though they have been proven wrong by the recent British study of cases where capacity actually has been reduced.

Instead, the conventional wisdom seems to be that we should underground mainline freeways when they obsolesce, so they do less damage to the surrounding neighborhood. Yet undergrounding freeways is tremendously expensive. The "big dig" in Boston cost $14.6 billion to underground just two miles of freeways - far more than the initial projection of $4 billiion.

The usual argument for undergrounding is that we cannot simply eliminate existing mainline freeways, because removing them would cause congestion and drivers would waste many hours in traffic. But this is no different from the traffic engineers' argument that building new freeways will save drivers time. In reality, because people have a constant time budget that they devote to transportation, they will eventually change their patterns of activity to accommodate lower speeds. We can deal with congestion in the short term using parking cash-out, congestion pricing, and other forms of transportation demand management. And we can make it possible for people to change their patterns of activity in the long term by promoting public transportation and smart growth.

The conventional wisdom - that we should build pubilc transportation and pedestrian and transit-oriented development - is not enough in itself.. As long as people can travel at 60 or 70 miles per hour on the freeways, they will drive to do their shopping at big-box stores and drive to work at jobs in Edge Cities, just as often as they shop at the stores near their homes and take transit to jobs in city centers.

This is what has happened in the past: in the 1930s, American cities were all pedestrian and transit oriented, but much of this transit and local shopping has vanished because of competetion from freeways and freeway-oriented shopping.

The same thing continues to happen today. New York City has plenty of local shopping, but it loses sales tax revenues to suburban counties because people drive there to shop at big-box stores. To recover these tax revenues, it is under pressure to allow more big-box shopping within city limits, though these new big-box stores would obviously draw even more people from neighborhood shopping streets.

To build environmentally sustainable cities, in addition to promoting public transportation and smart growth, we need to remove mainline freeways and, in most cases, to replace them with boulevards. Boulevards can carry a substantial amount of traffic - but at a lower speed than freeways. Boulevards allow cross-traffic, so they do not slice apart neighborhoods like freeways. In fact, with a service and parking lane on each side, separated from the main traffic flow by landscaped medians, they can provide an attraction that helps pull the neighborhood together. Boulevards can also include light rail in a separate right of way.

The idea of removing mainline freeways sounds radical today, but it will prove to be necessary during the twenty-first century, in order to deal with global warming and the depletion of fossil fuels.

After all, the changes that we need in the twenty-first century are no more radical than the changes that occured during the twentieth century, when we transformed our traditional pedestrian- and transit-oriented cities into automobile-oriented sprawl by building freeways and by zoning for low-density suburban style development. During the twenty-first century, we need to transform the sprawl back into something more like traditional cities by building public transportation, promoting smart growth, and removing freeways.

The twentieth century's freeways and suburban zoning gave us more traffic, gave us an ugly landscape of strip malls and sprawl, gave us neighborhoods where it is impossible to go anywhere without driving, and are now giving us global warming.

By contrast, freeway removal, transit, and smart growth would give us less traffic, would give us neighborhoods that are attractive enough that we would enjoy walking, and would leave a healthier global environment to our children and grandchildren.

The following freeway removals are being planned by city and state governments:

- **Rochester, NY, Innerloop:** The Inner Loop completely circles downtown Rochester, and the city has planned to remove it since 1990, when it completed its "Vision 2000 Plan" for downtown. In addition to this official city support, there is strong citizen backing to "demote the moat." The city is now studying the impact of this plan on traffic, and then will try to get funding for it.

- **Trenton, NJ, Route 29:** The freeway was initially designed to remove trucks from local streets, but truck traffic was banned from it before its completion. In response to complaints from the city, the state Dept. of Transportation is now planning to remove this freeway and replace it with a boulevard and local street grid, freeing up 18 acres of land for development. This plan is one of NJDOT's "smart growth corridor studies."

- **Akron, OH, Innerbelt**: Inspired by the example of Milwaukee, Akron mayor Don Plusquellic has proposed removing the Innerbelt freeway to promote economic development. The city is now conducting a $2 million study of this freeway removal.

- **Washington, DC, Whitehurst Freeway:** City officials are discussing plans to remove this three-quarter-mile-ling freeway, which divides Georgetown from its waterfront, and to replace it with a boulevard. There are also preliminary discussions of removing other elevated freeways, including Southeast Freeway near the Capitol and part of the Rock Creek and Potomac Parkway near the Lincoln Memorial.

- **Cleveland, OH, Shoreway:** The Connecting Cleveland 2020 city-wide plan calls for this freeway to be converted to a boulevard, removing the barrier between Cleveland and its Lake Erie waterfront.

- **New Orleans, LA, Claiborne Expressway**: The New Orleans draft master plan calls for removing the elevated Claiborne Expressway (I-10) between the Pontchartrain Epxressway and Elysian Fields Ave.

- **Nashville, TN, Downtown Loop:** Nashville's fifty-year plan, adopted in 2004, calls for gradually removing the eight-mile downtown loop made up of three interstates - Interstate 65, Interstate 40 and Interstate 24 -- and replacing it with parks, boulevards and mixed-use communities to reconnect downtown with adjacent neighborhoods.

- **New Haven, CT, Route 34 Connector**: New Haven Mayor John DeStefano, Jr.'s Future Framework 2008 plan proposes removing this 1.1 mile freeway stub, restoring the street grid, and rebuilding the neighborhood that was removed when over six hundred families and businesses were removed to build this freeway in 1955-1957.

- **Montreal, Quebec, Bonaventure Expressway:** The Société du Havre de Montréal (Montréal Harbourfront Corporation), a non-profit organization with financial support from three levels of government, has created the Montreal Harbourfront Vision 2025, which calls for replacing the Bonaventure Expressway with a boulevard to encourage development of adjacent areas.

- **Tokyo, Japan, Metropolitan Expressway:** Since the year 2000, citizens have talked about removing the Metropolitan Expressway viaduct,which is built over the Nihombashi River in the center of Tokyo. As a result, the city and national government have incorporated the removal of this freeway and restoration of the river in their policies and are conducting planning studies of this issue.

- **Sydney, Australia, Cahill Expressway:** Sydney Lord Mayor, Clover Moore, proposed removing this freeway for aesthetic reasons. The *Sydney Morning Herald* immediately editorialized that "experience overseas shows pulling down motorways can also help ease traffic congestion," so it would not be necessary to replace it with an underground road. This editorial is an important sign that the idea of freeway removal has become mainstream.

The following freeway removals have been proposed by citizens:

- Baltimore, MD, Jones Falls Expressway: In 2005, the late Walter Sondheim, a civic leader who promoted the revival of downtown Baltimore through projects like Charles Center and the Inner Harbor redevelopment, proposed removing the portion of the Jones Falls Expressway that leads into downtown and replacing it with an extension of President Street. City officials have expressed some support for this project, and it will probably be implemented when the current elevated structure becomes obsolete in about 2020.

- Seattle, WA, Alaska Way Viaduct**:** The powers that be thought that a referrendum would settle whether an underground freeway or a new elevated structure alternative would be used to replace this double-decked elevated freeway, which cuts Seattle off from its waterfront. But the voters surprized the politicians and rejected both alternatives. Now, some politicians are backing removal. People's Waterfront Coalition was the first group fighting for this freeway removal.

- Bronx, NY, Sheridan Expressway: Neighborhood residents and environmentalists have called for removal of this freeway and restoration of the Bronx River as a park. Despite widespread support, the Bronx borough president is resisting the idea because he wants the traffic capacity available for the Hunt's Point market, though studies have shown it is not needed. South Bronx Watershed Alliance is fighting for this freeway removal, and you can get the latest news about it from their blog.

- Buffalo, NY, Route 5: New York State Dept. of Transportation is proposing an expansion of Route 5 along Buffalo's waterfront, and citizens are saying that, instead, they should remove this freeway and replace it with a boulevard. The Congress for the New Urbanism is the most prominent proponent of this alternative.

- Hartford, CT, Aetna Viaduct: The Aetna Viaduct, an elevated portion of I-84 that goes through the center of the Hartford, reached the end of its projected life in

2005. When the city proposed repairing the freeway, citizens groups called for its removal. Hartford Mayor Eddie Perez has worked with these groups and gotten funding for a study of alternatives, including converting the freeway into a boulevard.

- Syracuse, NY, I-81: The elevated portion of Interstate 81 that goes through the center of Syracuse is nearing the end of its useful lif. The Onadoga Citizens League has issued a report named "Rethinking I-80," which calls for the I-81 alternatives study to include "a pedestrian-friendly boulevard in the European tradition" as one alternative studied.

- Louisville, KY, Interstate 64: The state freeway planners are proposing an $4.1 billion expansion of this freeway along the Ohio River waterfront, which would increase the interchange known as Spaghetti Junction to 23 lanes. The group called 8664 wants to remove this freeway instead. (86 is slang for remove.) They have produced an excellent graphic presentation about the issue at http://www.8664.org/.

- Portland, OR, I-5: The first freeway removal was Portland's Harbor Drive, on the west bank of the Willamette River. Now Riverfront for People is calling for the removal of I-5, on the east bank of the Willamette.

- Chicago, IL, Lakeshore Drive: A grassroots coalition called The Campaign for a Clear and Free Lakefront, is calling for the removal of Lakeshore Drive from Grant Park and ultimately from the entire waterfront. Without this eight-lane superhighway, the park would be an open, free, and clear space for Chicagoans to enjoy.

As the Long Beach (710) Freeway project lurches forward to what will probably be yet another roadblock as it stumbles toward completion, now is the time to consider what would be a far better way to "improve" it. (Oh, what a dangerous verb when used by highway planners!)

Previously suggested improvements in the freeway's more than two-decade history include digging a massive tunnel, and steamrolling thousands of businesses and many thousands of homes in some of the few livable neighborhoods left in that part of Los Angeles.

If we really want to improve traffic flow between Long Beach and the San Gabriel Valley, we should tear down the entire 710, because it is inherently inadequate to the task.

Before you shout, "Unprecedented," let me point out that there is in fact considerable precedent for tearing down freeways:

• In 1974, Portland, Ore., not only dismantled a freeway, but canceled plans to build five more that would have effectively dissected the city. Instead, they put the money into an integrated bus, light-rail and streetcar system, and a reconfiguration of streets to facilitate bicycle transit. The result? Today's vigorous, lively downtown, diverse and pleasurable neighborhoods, a booming economy, and a rating as the most livable city in the United States.

• In 1989, San Francisco took the lemon presented by a massive earthquake that knocked down the Embarcadero Freeway, and instead of rebuilding it, made very sweet lemonade, indeed, carting away the rubble and demolishing what was left standing by the shaker. The revived Embarcadero is a centerpiece of San Francisco's civic life and economy.

• New York tore down a freeway in the 1970s and is preparing to tear down the Sheridan Expressway in the Bronx.

• Seattle and Cleveland are each planning to tear down freeways by 2012, and Milwaukee unburdened itself of one in 2002 – and, notes then-Mayor John Norquist, congestion didn't jump. Instead, traffic dispersed around city streets and business got better.

So it's not nearly so radical an idea as it seems. It's not even liberal: Freeways are highly subsidized and extremely inefficient, and induce people to drive even when driving drains government treasuries and suppresses commerce. To quote from the Citizens Advisory Committee Northern Virginia Coordination Council:

"The basic problem with urban/suburban freeways is that they take up so much space for the capacity they deliver. At 1,500 cars per lane per hour, a six-lane freeway's maximum capacity is about 11,000 people per hour ... within a 300 foot right-of-way. Urban rail systems can deliver as much or more capacity in 100 foot or less of (right-of-way). ... Heavy-rail systems like the Washington Metrorail have five times the capacity of a six-lane freeway in about one-third the space and cost about the same per mile as the Century Freeway in Los Angeles."

By contrast, freeway fanatic Wendell Cox's plan for Atlanta would result in a kind of hell – to quote conservative analysts Paul M. Weyrich and William S. Lind:

"Cox believes it would be realistic to create a grid of arterial roads six to eight lanes wide, no more than one mile apart, throughout metro Atlanta. He also says there should be another grid of freeways crisscrossing the region. … He calls for building freeways underground in double-decked tunnels and double-decking other above-ground freeways. He advocates adding another deck exclusively for trucks. … In essence, Cox is suggesting that between now and 2025, we should raze Atlanta as we know it and replace it with Los Angeles – on steroids."

But what about freight, the real reason for the 710 (despite some proponents' bland assertions that trucks would be banned from the extension)?

The solution is simple: heavy rail for freight to complement light rail for people. Build another Alameda Corridor trench along the 710's route, run light rail on spans above the trench for passengers, add a bicycle freeway alongside and throw in a two-lane road for local travel. You could even electrify the freight route, lessening its impact even further, and run shuttle trains (operated by the city or a contractor) between the harbors and the big main freight yards in Colton.

Instead of crushing neighborhoods with noise, pollution and induced traffic on feeder roads, or walling them off with highways a quarter-mile wide, you would increase the freight and passenger capacity of the corridor, reduce pollution and noise, lessen congestion, and free up precious land for tax-paying homes and businesses, schools and civic facilities, and parks, and even urban farms.

Radical? Maybe. Sensible, responsible and profitable? You bet!

Yours,

Joe Potts
806 Meridian Ave.
South Pasadena, CA 91030 USA

Ron Kosinski/D07/Caltrans/CAGov

04/15/2011 12:31 PM

To Allison Morrow/D07/Caltrans/CAGov@DOT

cc

bcc

Subject Fw: Public input for Draft EIR/EISScoping for the 710 Gap Closure project - May, 2011

----- Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 04/15/2011 12:31 PM -----

Judy Bergstresser <bergstressers@sbcglobal.net>

04/14/2011 02:40 PM

To <Ron_Kosinski@dot.ca.gov>

cc

Subject Public input for Draft EIR/EISScoping for the 710 Gap Closure project - May, 2011

Ron Kosinski

Deputy Director

Division of Environmental Planning

Caltrans District 7

100 S. Main street, MS 16A

Los Angeles, CA 90012

RE: **SR-710 Environmental Impact Report/ Scoping Request of May, 2011**

Dear Mr. Kosinski,

The scoping report and EIR/EIS must and does not include the cumulative impact of the related widening of the southern portion of the I-710. The omission of such a cumulative study and project definition constitutes unreasonable segmentation.

The scoping report and EIR/EIS must and does not contain an explanation of the need for and benefits of this project.

The scoping report and EIR/EIS must fully study the no-build and low-build/multi-mode options as the environmentally superior alternatives.

The scoping report and EIR/EIS must and does not include the alternative to transfer container cargo to the railways instead of trucks.

The scoping report and EIR/EIS must and does not provide an integrated land use and transportation system design.

The scoping report and EIR/EIS must and does not include the environmentally superior GRID project (see attached.)

Judy Bergstresser

1945 Meridian Avenue

South Pasadena, CA 91030

GRID – Gabriel River Infrastructure Development Project

A Major Problem is on the Horizon for Southern California. The Panama Canal is being widened to allow passage of large container ships. The Canal widening project is scheduled for completion in August, 2014. Once the wider canal is open, container ships from the Far East will have passage to US ports on the east coast. Significant revenue and jobs related to moving freight through the Ports of Los Angeles and Long Beach, the Union Pacific Railroad (UP), and the Burlington Northern Santa Fe Railroad (BNSF) will leave Southern California unless there is a significant improvement in the Ports' efficiency and cost competitiveness. Both UP and BNSF have planned upgrades to their container transfer facilities for a combined $1B, and the Ports have $1.5B in planned upgrades as well, but these are limited efficiency improvements that will not result in lower pollution levels. None of these projects reduce the excessive operating costs and labor inefficiency of container handling in the "golden mile" from cargo ship to Port gate. Each of these upgrade projects is being fought by environmental groups concerned about negative public health impacts, including increased smog, greenhouse gases, freeway truck traffic congestion, water pollution from construction and highway runoff and wildlife habitat disruption.

Living Conditions will Dramatically Decline for Citizens Living Along IH-710. In an effort to improve local freight movement to and from the Ports, Caltrans has proposed widening the southern part of the I-710 at an estimated cost of $6.8B. This project would require destruction of numerous homes and private properties to secure the proposed expanded right of way. Caltrans has also proposed building a toll tunnel in the San Gabriel Valley to extend the northern terminus of the 710 to the I-210. Cost estimates for tunnel construction have ranged from $3B - $14B. Both of these projects will increase local pollution levels and are strongly opposed by environmental groups, with active litigation.

GRID is a solution that merges economic imperatives

with environmental concerns.

Streamline Ship-to-Rail Operations at the Ports. The "Superdock Container Facility" (SCF) converts otherwise unused space under current shipping cranes into a computerized storage facility for empty and loaded containers. Containers are moved to and from ships directly into the superdock. Full-length trains drive under or adjacent to the SCF to be loaded or unloaded within the Port, so there is no intermediate shuffling of containers to off-site container transfer facilities where currently trains are assembled for transport beyond Southern California. Use of the SCF could reduce unloading and reloading time for cross-country trains from 36 to less than 2 hours, at a much lower total cost than today's port facilities.

Use Underground Pipeline for Electric Cargo Trains. To optimize movement of containers to and from Southern California and minimize pollution, an underground, powered rail "container conveyor" freight pipeline is proposed to run from the SCF to inland rail hubs connected to existing warehousing and trans-loading lots in the Inland Empire, central California and beyond. This pipeline would move containers using clean electricity, drastically reducing diesel fume emissions and freeing up large sections of currently truck-bound highway for commuter use.

Embed Power and Water Transmission along the Freight Pipeline. The San Gabriel River bed is the ideal right-of-way location for an unobstructed "container conveyor" freight pipeline. Excavation of the river concurrently provides the opportunity for underground installation of electrical conduit so that the urban blight of high-voltage transmission towers are dismantled and removed. The thousands of acres currently occupied by power line rights-of-way will be made available for massive urban renewal. Pipelines could be included to carry desalinated water and for mitigation of storm water runoff that currently causes downstream pollution and waste.

Create an Urban Greenbelt Interspersed with Environmentally Sustainable Neighborhood Clusters. Following pipeline construction, the San Gabriel River can be rehabilitated to restore and protect the watershed naturally. Ecologically sustainable, transit-oriented higher-density villages will be

connected by a greenbelt of walkways, bikeways, parks and sustainable aquifers. Clustered, affordable housing with pedestrian-friendly streets creates livable neighborhoods, reduces dependence on the automobile, lowers infrastructure cost and allows for aesthetically pleasing, protected open spaces. Commuter light rail connecting the six existing east/west Metrolink, light rail and Amtrak lines will dramatically increase mobility and reduce the need for trips to the downtown Union Station merely for interconnection.

Together, These Projects are GRID, the Gabriel River Infrastructure Development. GRID will slash diesel emissions and substantially relieve highway congestion. Construction of GRID will not block or hinder any existing traffic routes. GRID will save port and transportation jobs that would otherwise be lost to Panama and Mexico while and creating thousands of new opportunities. Approval of GRID will obviate the need for each railroad's independent new container transfer facilities, several Ports upgrades, the widening of southern I-710 and a tunnel for the northern SR-710. The $15B to $23B estimated cost for those projects can be applied as funding for a Public Private Partnership for GRID. Total cost for GRID is as economically feasible as existing proposals that simply expand and exacerbate the problems they attempt to resolve. Nearly all aspects of GRID can be domestically engineered, manufactured and fabricated so that GRID would provide hundreds of thousands of jobs to California other of our nation's states.

For additional information on GRID contact David Alba, Project Systems Designer, at (626) 513-3650 or davidalba1@gmail.com.

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The Superdock Container Facility (SCF) consolidates ship to train loading for both Ports in one emission-free terminal.

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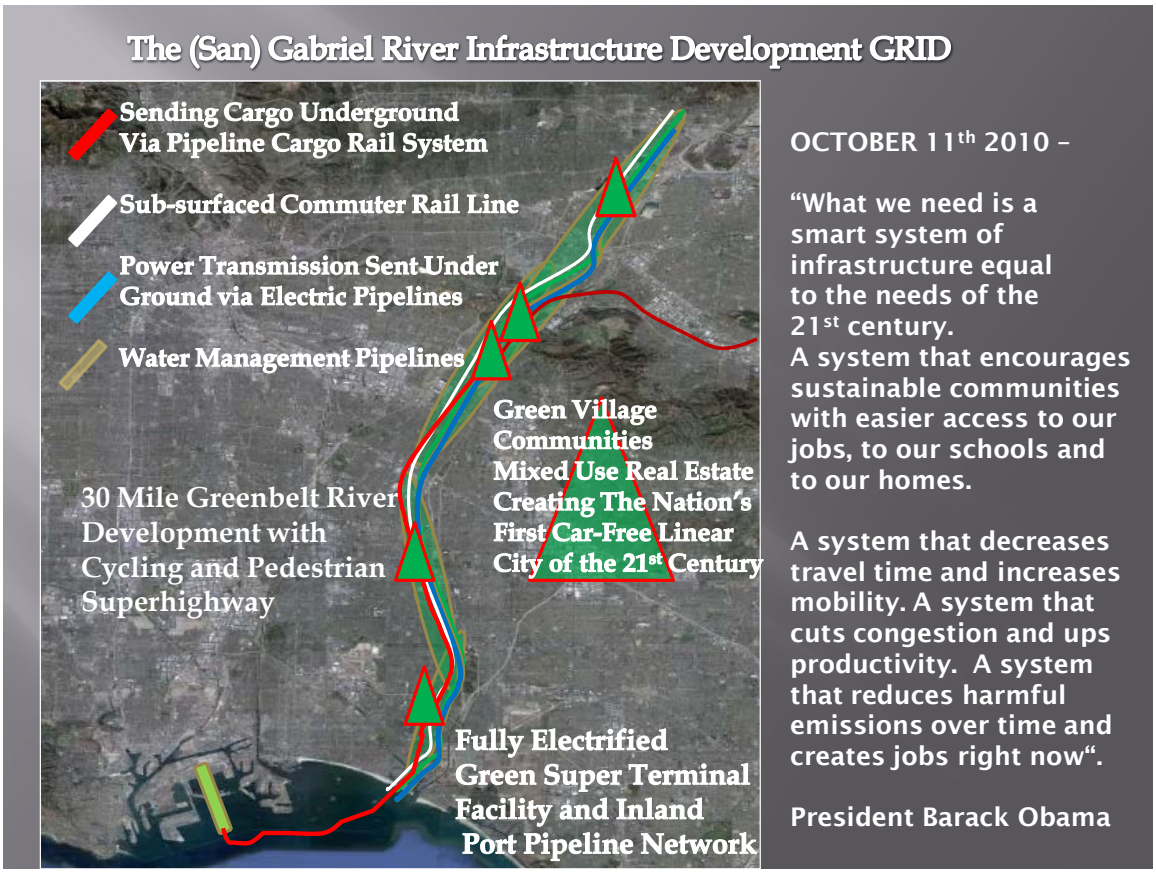
GRID modernizes ship-to-rail port operations and uses underground pipeline for container cargo movement, water and power. GRID transforms the San Gabriel River flood control channel into environmentally sustainable neighborhoods, protected green space and a light-rail transportation corridor.



Create an Urban Greenbelt Interspersed with Environmentally Sustainable Neighborhood Clusters. Following pipeline construction, the San Gabriel River can be rehabilitated to restore and protect the watershed naturally. Ecologically sustainable, transit-oriented higher-density villages will be connected by a greenbelt of walkways, bikeways, parks and sustainable aquifers. Clustered, affordable housing with pedestrian-friendly streets creates livable neighborhoods, reduces dependence on the automobile, lowers infrastructure cost and allows for aesthetically pleasing, protected open spaces. Commuter light rail connecting the six existing east/west Metrolink, light rail and Amtrak lines will dramatically increase mobility and reduce the need for trips to the downtown Union Station merely for interconnection.

Together, These Projects are GRID, the Gabriel River Infrastructure Development. GRID will slash diesel emissions and substantially relieve highway congestion. Construction of GRID will not block or hinder any existing traffic routes. GRID will save port and transportation jobs that would otherwise be lost to Panama and Mexico while and creating thousands of new opportunities. Approval of GRID will obviate the need for each railroad's independent new container transfer facilities, several Ports upgrades, the widening of southern I-710 and a tunnel for the northern SR-710. The $15B to $23B estimated cost for those projects can be applied as funding for a Public Private Partnership for GRID. Total cost for GRID is as economically feasible as existing proposals that simply expand and exacerbate the problems they attempt to resolve. Nearly all aspects of GRID can be domestically engineered, manufactured and fabricated so that GRID would provide hundreds of thousands of jobs to California other of our nation's states.

For additional information on GRID contact David Alba, Project Systems Designer, at (626) 513-3650 or davidalba1@gmail.com.

Mary Ann Parada
1710 Ramona Ave.
South Pasadena, CA 91030-4426

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

April 12, 2011

Via E-mail and U. S. Mail (ron_kosinski@dot.ca.gov)

RE: Comments on SR-710 Notice of Preparation and Notice of Intent

Dear Mr. Kosinski:

In the Route 710 Tunnel Technical Feasibility Assessment Report –Metro – November l5, 2006, Chapter 10.0 Potential Funding (page 10-124) it states: "…Since the initial order of magnitude construction cost estimate for the tunnel is $3 billion (2006 dollars), the project would fall under the FHWA Mega Project classification which requires the development of a comprehensive financial plan , with annual updates on actual cost and revenue performance in comparison to initial estimates as well as updated estimates of future year obligations and expenditures, cost and revenue trends, current and potential funding shortfalls and the financial adjustments necessary to assure completion of the project. "

However, in the same Report on page 10-133, the cost estimates of the project keep escalating: "….Depending on which construction scenario is chosen and when construction begins, the $3 billion (2006 dollar) order of magnitude construction cost estimate is projected to be in the range of $4.3 to $5.5 billion year of expenditure dollars. "

Wow, in only 9 pages, the cost of the project almost doubles!!

The Report failed its own criteria outlined on page 3 of the Executive Summary by considering only construction costs. What is excluded in the Report is:

1. No cost to address environmental or community impact requirements.
2. No cost of electrostatic precipitators.
3. No cost for land acquisition.
4. No cost for project design.
5. No cost for construction management.
6. An allowance for only a l5 percent design contingency. This number is low for a Mega Project. Allowances of 30 percent to 50 percent would not be unreasonable for design contingency, according to Dr. Gary S. Brierley, South Pasadena's tunnel consultant.

Caltrans must include these in the Draft EIR/EIS.

Which agency – Caltrans or Metro- assumes the cost of $33,000,000 a year for perpetual operations and maintenance?

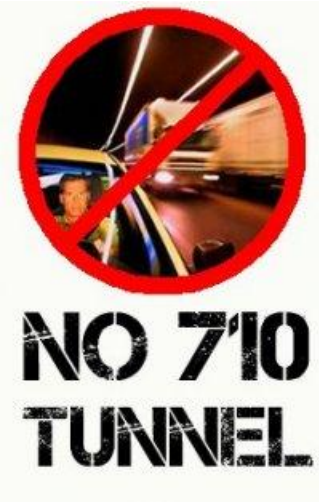
Caltrans must produce a detailed analysis of all costs before a final decision could be made concerning the financial feasibility of such a Mega Project.

Sincerely,

Mary Ann Parada

Mary Ann Parada
1710 Ramona Avenue
South Pasadena, CA 91030-4426
(323) 255-4042
maryaparada@yahoo.com

STOP THE TUNNEL!



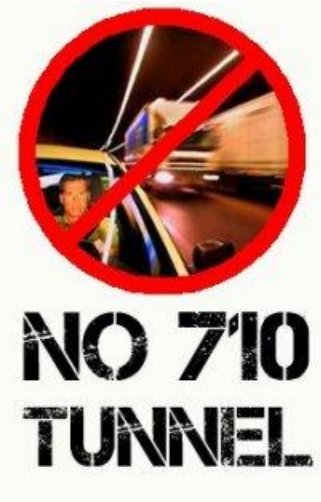
Our Community Never Asked For Your Tunnel & We Will Never Accept Any of Your Terms or Conditions!

Dig Your Tunnel Some Where Else!

STOP THE TUNNEL!

Here are some of the many organizations who are opposed to the construction of the unwanted 710 Freeway extension:

Advisory Council on Historic Preservation
Altadena Heritage
All Saints Church
California Office of Historic Preservation
California Preservation Foundation
California Public Interest Research Group **(CALPIRG)**
California Tax Reform Association
Caltrans Tenants Association
Citizens for a Better Environment
Citizens United to Save South Pasadena
City of South Pasadena
Coalition for Clean Air
Cooperative Resources and Services Project (CRSP)
ECO-Cities Council
Eminent Reclaim
Friends of the Earth
Green Capitol
Highland Park Heritage Trust
Highland Park Neighborhood Association
Los Angeles Conservancy
National Parks and Conservancy Association
Natural Resources Defense Council



STOP THE TUNNEL!

Here are some of the many organizations who are opposed to the construction of the unwanted 710 Freeway extension:

National Taxpayers Union

Neighbors for Better Transportation

"No 710", Neighborhoods Opposed to the 710 Freeway

Offices of Antonio Rossman

Counsel for the City of South Pasadena

The Blue Line Construction Authority

Pasadena Heritage

Planning and Conservation League Foundation

Sierra Club

South Pasadena Chamber of Commerce

South Pasadena Preservation Foundation

South Pasadena Unified School District

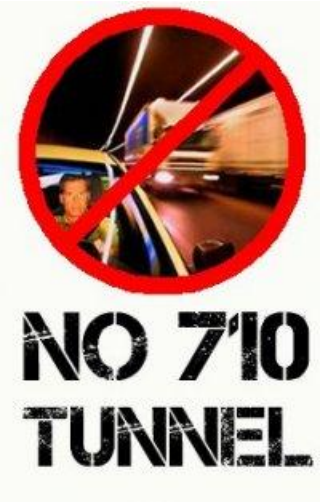
Holy Family Church

http://www.no710.com/

http://stopthe710.org/

The Hard Working People of El Sereno, California

http://www.VoteOscar.com/



12 April 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main St., MS 16A
Los Angeles, CA. 90012

Re: Comments on Scoping (So called 710 "Gap Closure" Project)

Dear Mr. Kosinski:

Thank you for allowing me the opportunity to comment upon the scope of the EIR/EIS on the SR 710 Freeway Extension (sometimes erroneously referred to as the "710 Gap Closure").

The statement below is the same as my verbal statement made on 6 April of this year during the SR-710 Conversations held at Ramona Hall in North-East Los Angeles.

"The EIR/EIS must analyze and provide justification that indeed the South 710 and North 710 Projects are separate, not inter-related and that one does not impact the other."

"A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole". (*Orinda V. Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1171.)

Sincerely,

Sam Burgess
626 Prospect Ave. #B
South Pasadena, CA. 91030
626-441-1205

samburgess@sbcglobal.net

12 April 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main St., MS 16A
Los Angeles, CA. 90012

Re: Comments on Scoping (So called 710 "Gap Closure" Project)

Dear Mr. Kosinski:

Thank you for allowing me the opportunity to comment upon the scope of the EIR/EIS on the SR 710 Freeway Extension (sometimes erroneously referred to as the "710 Gap Closure").

The significance and concerns of the impacts of vehicular pollutants released into the atmosphere from proposed portals and ventilation stacks and which exceed accepted standards and thresholds of both NAAQS and SCAQMD are discussed in Chapter 8.4.2 (pages 109-110) of the Parsons Brinkerhoff Report (June 7, 2006):

"If air pollutant levels were found to exceed these standards and thresholds, then the following potential mitigation measures would be considered:"

- **"Raising the height of the ventilation shafts to increase atmospheric dispersion."**
- **"Relocate ventilation shafts away from areas of sensitive land use."**
- **"Revise the ventilation system to minimize the discharge at the portals."**
- **"Modify the ventilation system at the portals to increase dispersion."**

The four potential mitigation measures listed are not realistic or are inadequate. These measures can only be implemented after construction is complete and the tunnel is fully operational. It is therefore necessary they be shown as viable solutions in reducing pollutants below levels of significance during the EIR/ EIS process.

Point 1: *"Raising the height of the ventilation shafts to increase atmospheric dispersion."*

To what height? A detailed analysis of the various potential heights needed, "...to increase atmospheric dispersion", must be given. This analysis must include the maximum shaft height allowed by law and the maximum extension in height possible while still maintaining the structural integrity of the ventilation shafts.

Point 2: *"Relocate ventilation shafts away from areas of sensitive land use."*

To where? This is an unrealistic proposal. A definition of, "sensitive land use", is needed. This definition must clearly state if residential, commercial and public lands are considered equally sensitive. All potential sites for ventilation shaft relocation must be identified and the effectiveness of relocating these shafts so as to reduce vehicular pollutants to below levels of significance must be studied and proven. The maximum distance a ventilation shaft can be placed away from the tunnel and remain effective must be shown.

Point 3: *"Revise the ventilation system to minimize the discharge at the portals."*
Point 4: *"Modify the ventilation system at the portals to increase dispersion."*

The terms "revise" and "modify" have not been defined. Defining these terms in clear and unambiguous language is necessary prior to accepting them as potential mitigation measures. Evidence must be provided as to how these revisions or modifications will be effective in bringing vehicular air pollutant emissions to below significant impact levels.

After study or analysis, if these mitigation measures prove impractical or inadequate, other potential mitigation measures must be thoroughly vetted during the EIR/EIS process.

Sincerely,

Sam Burgess
626 Prospect Ave. #B
South Pasadena, CA. 91030
626-441-1205

samburgess@sbcglobal.net

Sharon A. Lilly
Los Angeles, CA 90042
April 12, 2011

Ron Kosinski
Deputy Director
Division of Environmental Planning
Caltrans District 7
100 S. Main street, MS 16A
Los Angeles, Ca 90012

RECEIVED 4/14/11

Dear Mr. Kosinski,

RE; SR-710 Environmental Impact Report/ Scoping Request.

In line with the National Transportation Objectives and Targets 2010- 2030, included, I am requesting the inclusion of studies of rail systems for moving freight, such as electric, non-polluting Mega Rail/Cargo Rail, and other such smart alternatives in the SR-710 Environmental Impact Report/ Scoping.

I am requesting that this analysis include the study of the efficacy of rail freight systems for the lower 710 freeway as well.

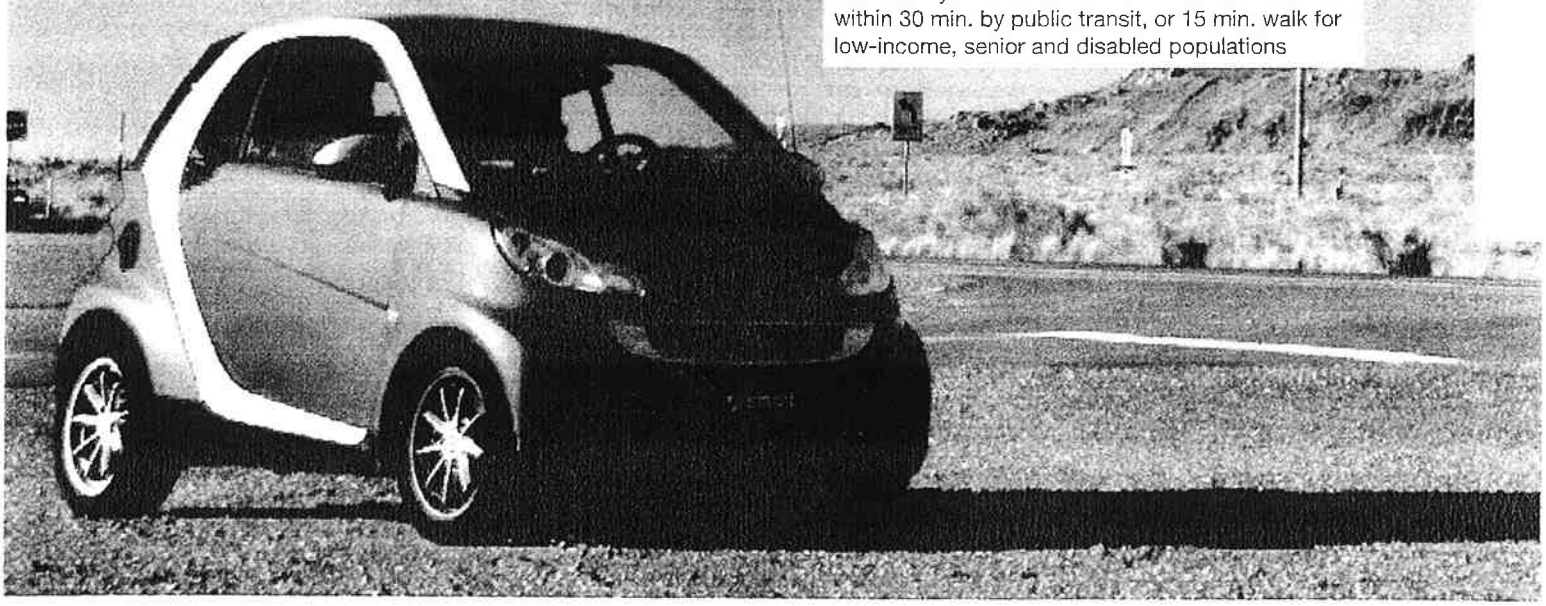
I am requesting that the results of this analysis be known to the public in a timely and transparent fashion.

The reasons for this request are in line with the National Transportation Objectives and Targets, see attached document. The future health and quality of life of the entire Los Angeles County area are at stake. Rail freighting is profoundly less costly, profoundly less polluting, can be accomplished in a fraction of the time needed for tunnel/ freeway construction, and it gets the congesting truck traffic off of the freeways.

Sharon A. Lilly
659 Oleander Dr
LA, CA 90042

National Transportation Objectives & Targets

Objectives	2010-2030 Performance Targets
Improve Economic Competitiveness, Transportation System Efficiency and Workforce Development Opportunities	Reduce per capita vehicle miles traveled by 16%
Improve Transportation System Conditions and Connectivity	Triple walking, biking and public transportation usage
Promote Energy Efficiency and Achieve Energy Security	Reduce transportation-generated carbon dioxide levels by 40%
Ensure Environmental Protection, Restore Climate Stability and Resolve Persistent Environmental Justice Issues	Reduce delay per capita by 10%
Ensure Safety for All Transportation Users and Improve Public Health Outcomes	Increase proportion of freight transportation provided by railroad and intermodal services by 20%
Provide Equal and Equitable Access to Transportation Options in Urban, Suburban and Rural Communities	Achieve zero percent population exposure to at-risk levels of air pollution
	Improve public safety and lower congestion costs by reducing traffic crashes by 50%
	Increase share of major highways, regional transit fleets and facilities, and bicycling/pedestrian infrastructure in good state of condition by 20%
	Reduce average household combined housing + transportation costs 25% (use 2000 as base year)
	increase by 50% essential destinations accessible within 30 min. by public transit, or 15 min. walk for low-income, senior and disabled populations



Sharon A. Lilly
Los Angeles, CA 90042
April 12, 2011

4/14/11

Ron Kosinski
Deputy Director
Division of Environmental Planning
Caltrans District 7
100 S. Main street, MS 16A
Los Angeles, Ca 90012
Dear Mr. Kosinski,

RE; SR-710 Environmental Impact Report/ Scoping Request.

I am requesting a "hot spot analysis" at the following locations related to the routes under consideration for the proposed 710 tunnel project:

Sensitive Receptor Community Sites- asterisk indicates location 1/4 mile to 1 mile from existing freeway. Additionally there are at least 23 private schools within the hot spots boundaries

***Dahlia Heights Elem**

***Eagle Rock Elem**

***Rockdale Elem**

***Annandale Elem**

***Delevan Dr Elem**

Yorkdale Elem

***San Pascual Elem**

***Eagle Rock MS & HS**

***Monte Vista St Elem**

Franklin High School

***Luther Burbank MS**

Toland Way Elem

Buchanan Elem

***Latona Elem**

Aldama Elem

Mt Washington Elem

***Hillside Elem- Hermon area**

***Bushnell Way Elem**

***Fletcher Dr Elem-**

***Garvanza Elem**

The Hot Spot analysis and modeling analysis should include harmful products e.g.,:

- Particulate matter PM to include all sized particles including ultrafine particles (<100nm) and nano particles (<50 nm), carbon black (organic carbon and elemental carbon), and degradation of road products and tires and brake linings and diesel catalyst decay products (including but not limited to metal particulate emissions, strontium, and a variety of organic compounds)
- Nitrogen oxides (NOx) and nitrogen dioxide (NO_2)
- Ozone
- Carbon monoxide (CO)

I am also requesting "Health Impact Assessments and Health Risk Assessments" at the above named sites.

In addition to the specified sensitive receptor community sites, the hot spot analysis should also include analyses of the **tunnel itself** with investigation of concentrations of all the above pollutants at peak traffic hours with congestion modeling, within the tunnels, at the portals and at ventilation shafts. Information about the ventilation shaft air cleaning should be provided consistent with the highest level of available technology and its cost. The modeling should include port truck traffic and be based on the current percentage of fossil fuel dependent vehicles. Time in tunnel at congestion speeds should be modeled for individuals who use the tunnel for regular commuting. Models should be created to look at what might happen at community sites if the traffic chooses to use the surface streets instead of the toll tunnel, which has been seen at various sites around the world.

The hot spot analysis should seek **peak** values for all measurements so as not to underestimate the effect on human health. The impact of various temperatures and day and night changes and local wind patterns should be included in model analyses.

Discussion:

Air pollution in our region is significantly influenced by fossil fuel emissions from transportation. Human health is significantly impacted by the air pollutants produced by fossil fuel combustion regionally and locally. Key pollutants that are recognized as having adverse health effects include particulate matter

(PM) of various sizes with increasing concerns about ultrafine particles and carbon black, ozone (O_3), Nitrous Oxide (NOX), and Nitrogen Dioxide (NO_2) as well as acid and organic vapors.

Health studies of air traffic pollution have shown an association with increased cancer risk, increased cardiovascular events and death, and lung inflammation with worsening of asthma and lung function.

Children are particularly sensitive to regional and local air pollution, leading to permanently decreased lung function and increased incidence of or worsening of asthma.

> Children in more polluted communities are almost 5 times as likely to have clinically abnormally lung function compared to those in less polluted communities. As alarming as this is, the greatest effect of pollution-related deficits may occur later in life, since reduced lung function is a strong risk factor for complications and death during adulthood.(NEJM Sept 9, 2004 vol 351: 1057-67 Gauderman)

Inability to get enough exercise because of poor air quality and asthma attacks can impair quality of life, and increase the risk of obesity and associated health problems. Later, societal health care costs could be significantly adversely impacted.

Proximity to a freeway or busy roadway increases many health risks. Wind can be a factor how far the pollution is distributed, up to 1.5 miles in some scientific literature.

Diesel emissions, predominantly from trucks, are major contributors to air pollution. Proximity to truck diesel traffic increases health risks. Diesel particulate emissions are labeled as cancer causing toxic air contaminants. The particles may penetrate deeply into lung and vascular tissues and stay there for a long time. Diesel particulate is responsible for 70% of total cancer risk from all toxic air pollution according to AQMD. Diesel gaseous compounds are also hazardous.

I am very concerned about the project proposal and the health impacts of increased truck and other highway traffic in our neighborhoods. I want livable, healthy neighborhoods, not more freeways.

Sharon O'Kelly
659 Oleander Dr
LA, CA 90042

Ron Kosinski
Deputy Director
Division of Environmental Planning
CalTrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

April 12, 2011

RECEIVED 4/14/11

Dear Ron,

For several years now there have been scientific studies and reports of those in the newspapers with overwhelming documentation of the harmful effects of heavy-duty diesel traffic and its attendant pollution, ultra-fine particulate matter at PM2.5, ozone, gases, disintegration of rubber tires and its metals and on and on.

The health consequences of increased air pollution in this non-attainment basin are of the utmost concern. To re-iterate what the South Coast Air Quality Management District stated in their February 17, 2009 letter regarding the I-710 project EIR Alternatives: "To attain national air quality standards as **required** by federal law, this region must reduce nitrogen oxides emissions by approximately two-thirds ***beyond the levels that will result from all the stringent rules adopted to date by federal, state and local agencies.*** SCAQMD, CARB and SCAG have not been able to identify sufficient specific measures to meet this need, and the region's Air Quality Management Plan thus includes a large "black box" federal Clean Air Act commitment of needed but unidentified control measures....In sum, **this region needs every possible emission reduction from goods movement and other mobile sources.** This must include zero-emission technologies wherever possible."

Air pollution can now be computed and assigned a dollar amount. "According to the American Public Health Association, it is estimated that health problems associated with our current transportation system—such as injuries, asthma, cardiovascular disease and premature mortality—may result in over $300 billion in additional costs every year. This amount includes accident and medical expenses, and lost wages and lost productivity." (The Health Care Blog, Dr. Aaron Wernham, 1/2011) These costs must be weighed against the cost of the project and the cost of alternative modes of transportation that perform better by moving goods and people more efficiently and with less risk.

In light of these facts and CEQA, whereby (an EIR must describe the "physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published...from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.")

The EIR/EIS must consider the cumulative impacts of the lower I-710 project, the widening to 14 lanes, which encourages diesel truck traffic from the Port of Los Angeles and Port of Long Beach and the SR 710 North roadway tunnels, that would provide roadways for those trucks to continue their path and create an impact that can only be described as significant in all measures in all zones.

The EIR/EIS must analyze the difference between the established baseline in physical conditions and the potential for devastating health consequences by means of a **HRA,** Health Risk Assessment. Each pollutant must be analyzed separately at peak hours of operation and compared with the existing conditions to determine the significance of the impacts in the EIR/EIS.

Health has been defined as "a state of complete physical, social and mental well-being, and not merely the absence of disease or infirmity" and the ability of an individual or group "to identify and to realize aspirations, to satisfy needs, and to change or cope with the environment."

A Health Impact Assessment (**HIA**) is "a combination of procedures, methods, and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population" (WHO, Gothenburg Consensus, 1999). HIAs explicitly consider social and environmental justice issues, adopt a **multidisciplinary and participatory process**, and use both qualitative and quantitative evidence as well as transparency in the process." Four values are integral to the HIA: democracy, equity, sustainable development, and the ethical use of evidence that emphasizes a rigorous structured analysis based on scientific disciplines and methodologies.

It seems that HRAs deal with the facts of pollution and HIAs deal with the mitigations possible. The EIR/EIS must address both reports in detail to do justice to the corridor residents.

There has been no indication that there are plans to mitigate the health consequences of the pollutants, only the identification of them. Expelling pollutants out the portals by virtue of the cars "pushing" the air forward or up 100 foot smoke stacks or any other vents along the route does nothing to really clean up the air. The EIR/EIS must address and mitigate the issues surrounding air pollution.

The EIR/EIS study area must be expanded to include the cities that would receive the brunt of the truck traffic on their open freeways – Glendale, La Canada, La Crescenta, Montrose and farther out the 210.

To address some of these issues we are including a brief bibliography and print outs for your use. A more complete bibliography can be found in the City of South Pasadena scoping letter and the No 710 Action Committee letter.

Sincerely,

Clarice Knapp
Clarice Knapp
417 El Centro St.
South Pasadena, CA 91030

Waynna Kato
Waynna Kato
1036 Hope St.
South Pasadena, CA 91030

HEALTH & POLLUTION

(1) Doug Failing, CalTrans CEO District 7: **"That cancer and emphysema rates are higher near tunnels is absolutely a true statement."** San Marino Tribune, 6/04/09

Pollution will be in the tunnel as well as spew from 4 vents (each 100 feet or 10 stories high) and at each end portal.

(2) • Researcher from Children's Hospital Los Angeles and USC finds proximity to freeway is associated with Autism. Case-Control Study demonstrates connection between Autism and traffic pollution. http://eon.businesswire.com/news/eon/20101215006967/en/autism/pollution

(3) • Tunnels concentrate air pollution by 1000 times. A toxic cocktail of ultra fine particles is lurking inside road tunnels in concentration levels so high they have the potential to harm drivers and passengers, a new study has found. Australia. http://x-journals.com/2009/tunnels-concentrate-air-pollution-by-up-to-1000-times/

(4) • Air pollutants from freeways extend further than previously thought. Air pollutants from Interstate 10 in Santa Monica extend as far as 2,500 meters, more than 1.5 miles downwind, based on recent measurements from a research team from UCLA. School of Public Health. "UCLA Newsroom", August 23, 2009

(5) • Childhood Asthma Linked to Freeway Pollution
By studying air pollution levels in ten Southern California cities, USC investigators show that proximity to freeways poses a respiratory risk. "Cars and trucks traveling on freeways and other large roads may be a bigger source of pollutants that matter for asthma than traffic on smaller roads. Keck School of Medicine, USC, "USC News" 9-21-05

(6) • Ultra fine particles pass the blood Brain Barrier. L. Calderón-Garcidueñas et al. Toxicol Pathol February 2008 vol. 36 no. 2 289-310. "Long-Term Air Pollution Exposure is Associated with Neuroinflammation, an Altered Innate Immune Response, Disruption of the Blood-Brain Barrier, Ultrafine Particulate Deposition, and Accumulation of Amyloid B-42 and A-Synuclein in Children and Young Adults". http://tpx.sagepub.com/content/36/2/289

(7) • American Lung Association – Los Angeles

High Ozone Days Grade F	Particle Pollution Grade F
Weight Average 96.5	Weight Average 28.7
Orange days 185	Orange days 77
Red days 55	Red days 6
Purple days 11	Purple days 0

(8) • People Near Freeways Are Exposed to 30 Tmes the Concentration of Dangerous Particles. People who live, work or travel within 165 feet downwind of a major freeway or busy intersection are exposed to potentially hazardous particle concentrations up to 30 times greater than normal background concentrations found at a greater distance, according to two recently published UCLA studies published in the Journal of the Air and Waste Management Association and in Atmospheric Environment. "Science Daily" October 21, 2002

(9) • The Southern California Particle Center and Supersite seeks to explore health and exposure issues related to mobile source pollution. California State Legislation enacted a law that new schools must be built at least 500 feet from busy roadways due to health risks. Southern California Particle Center and Supersite (SCPSC) http://www.scpcs.ucla.edu/SCPCSYr4.pdf
(But there is no law that new highways must be built farther away from schools)

(10) • Study on the lower 710 freeway was selected because more than 25% of the vehicles are heavy-duty diesel trucks. Average traffic flow during the sampling periods was 12,180 vehicles/h. "Study of ultrafine particles near a major highway with heavy-duty diesel traffic," Yifang Zhu, William C. Hinds Link: linkinghub.elsevier.com/retrieve/pii/S1352231002003540

(11) • **Inhaling a heart attack - Los Angeles Times**
June 23, 2009. Research links smog to devastating effects not just on lungs but on hearts, brains and fetal development. By Greg Critser articles.latimes.com/2009/jun/23/opinion/oe-critser23

(12) • The ports of Los Angeles/Long Beach combined contribute more than 20% of Southern California's diesel particulate pollution and are the single largest source of pollution in So Cal, according to SCAQMD. The California Air Resources Board (CARB), in its 2006 *Emission Reduction Plan for Ports and Goods Movement*, calculated that in California alone there are 2,400 premature heart-related deaths related to port and goods movement pollution, 62,000 cases of asthma symptoms, and more than 1 million respiratory-related school absences every year. Dr. Andrea Hriko, *Global Trade Comes Home: Community Impacts of Goods Movement*, 116 ENVIRONMENTAL HEALTH PERSPECTIVES No. 2 (Feb 2008) See next 3 entries.

(13) • A study by investigators at USC published 17 February 2007 in *The Lancet*, showed that children living near freeway traffic had substantial deficits in lung function development between the ages of 10 and 18 years, says lead author W. James Gauderman, "an individual with a deficit at this time will probably continue to have less than healthy lung function for the remainder of his or her life." Ibid.

(14) • Other studies linked traffic exposure to increased risk for low birth weight and premature birth. Feb. 2003 & Sept. 2005 *EHP*. Ibid.

(15) • A study published 6 December 2007 in the *New England Journal of Medicine* showed that adults with asthma who spent just 2 hours walking on a street with heavy diesel traffic suffered acute transient effects on their lung function along with an increase in biomarkers that indicate lung and airway inflammation. Ibid.

(16) • "There are claims that the 710 freeway extension would have positive air quality benefits and therefore is critical for demonstrating transportation conformity in the South Coast Air Basin. There are also claims that if the 710 extension is *not* built, transportation conformity could not be met thus resulting in the loss of federal transportation dollars. **These claims are not true.** Moreover, any claims of air quality benefits of the 710 project are **questionable** because the proponents have not adequately considered long term impacts." Felicia Marcus, Regional Administrator, United States EPA, 8/22/00

(17) • The investigators found that annual progression of artery wall thickness among those living within 100 meters of a highway was accelerated by 5.5 micrometers a year, more than twice the average progression of people who lived farther away. http://uscnews.usc.edu/health/air_pollution_linked_to_progression_of_atherosclerosis.html

Compiled by Clarice Knapp and Waynna Kato, South Pasadena Residents Updated 2-27-11

SAN MARINO Tribune
AND SAN MARINO NEWS
the Famous Huntington Library and Art Gallery
"Part of your family for 80 years" SM
Observing the 232nd Anniversary of America's Independence
No. 23 San Marino, Thursday, June 4, 2009 1441 San Marino Avenue (626) 792-NEWS $1.75 a Copy, $89 per year

Agency Studying 710 Tunnel Project Holds Meeting in San Marino

■ $7.1 Million Project Will Determine Best Possible Route for Underground Highway.

By Mitch Lehman
EDITOR OF THE TRIBUNE

The San Marino Center was adorned with display placards and other assorted visual aids Tuesday night as a multi-agency task force charged with producing a feasibility study for the proposed 710 Freeway tunnel project held a community open house that was attended by about two dozen citizens.

"There has been a missing link to the 710 Freeway for more than five decades," said San Marino Mayor Eugene Sun in his opening remarks. "I can say we now see the light at the end of the tunnel."

Led by Doug Failing, a district director of the State of California's Department of Transportation, the 710 Tunnel Technical Study Office is in the middle of a $7.1 million project – funded through a combination of state, federal and local grants – to determine if a tunnel is the answer to the area's traffic questions.

"This is a study to see if a tunnel is feasible," said Failing. "We are looking broadly throughout the San Gabriel Valley to see what the best option might be."

Failing also mentioned that in order to meet Congressional requirements, his group had to "research several options."

"We were told not to stick to one," Failing said.

That "one" undoubtedly referred to the long-uncompleted 710 Freeway between Alhambra at Valley Blvd. and Pasadena, where the unfinished 710 intersects at California Blvd.

The group has completed preliminary coring and soil sampling of five different zones, all emanating from the 710 and Valley Blvd. location and extending across the San Gabriel Valley from the 605 Freeway to the east and the 2 Freeway to the west.

The group is in the process of preparing a geological map of the

See TUNNEL, page A-6

Indiana Jones Coming to Town for Grad Night

San Marino High School PTSA will hold its annual Grad Night Light-up ceremony on Thursday, June 11 from 8:00 – 10:00 p.m. The public will be allowed a sneak peek of the Grad Night set by way of public tours, scheduled for Thursday, June 11 from 3:00 – 7:00 p.m. and Friday, June 12 from 10:00 a.m. – 12:00 noon. The class of 2009, which chose *'Indiana Jones'* as the theme for their Grad Night one year ago, will begin their Grad Night adventure following graduation the evening of June 12.

TUNNEL

From page A-1

area that will determine what might be the most accessible tunneling route based on seismic reflection tests, surface wave testing as well as core and water samples taken from bores in the five zones collected at depths of 250' – 450.'

Failing reported that a large plume of contaminated water has been found just south of San Marino near San Gabriel. Another panel member stated that the key factor in determining the best tunnel route would be the series of earthquake faults that lies beneath the San Gabriel Valley. The final study is due for completion in December, 2009.

During a question and answer session, several attendees addressed the subject of pollution, which the panel dismissed as a factor that has been successfully addressed through modern technology.

Some of the graphic placards displayed during an open house session showed similar tunnel projects in Shanghai, Paris and Madrid that are up to 50' in diameter and can accommodate three lanes of automobile traffic on an upper level and a light rail system on the lower level.

"We are going to prepare a highly technical analysis," said Failing. "That cancer and emphysema rates are higher near tunnels is absolutely a true statement."

When asked if the proposed 710 tunnel would require payment of a toll for usage, Failing said his group is not yet "discussing the building of a tunnel."

Another question probed at what might disqualify one location from consideration for tunneling.

"There is not one single issue, but the presence of compound issues would preclude a tunnel."

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Researcher from Children's Hospital Los Angeles and USC Finds Proximity to Freeway is Associated with Autism

Case-Control Study Demonstrates Connection between Autism and Traffic Pollution

December 16, 2010 12:18 AM Eastern Daylight Time

LOS ANGELES--(EON: Enhanced Online News)--Living near a freeway may be associated with increased risk of autism, according to a study published by a team of researchers from Children's Hospital Los Angeles, the Keck School of Medicine of the University of Southern California (USC) and the UC Davis MIND Institute.

The paper will appear online in the journal *Environmental Health Perspectives* this week.

"Children born to mothers living within 309 meters of a freeway appeared to be twice as likely to have autism," said Heather Volk, PhD, MPH, and first author on the study. Dr. Volk holds a joint appointment at the Community, Health Outcomes & Intervention Research Program at The Saban Research Institute of Children's Hospital Los Angeles, the Zilkha Neurogenetic Institute and the Department of Preventative Medicine at USC.

Autism is a developmental disorder that has long been ascribed to genetic factors. While changes in diagnostic criteria and increased awareness have been thought to contribute to the rising incidence of the disorder, these factors alone cannot explain the dramatic increase in the number of children affected. The Centers for Disease Control reported a 57 percent increase between 2002 and 2006. This study supports the theory that environmental factors, in conjunction with a strong genetic risk, may be one possible explanation for the increase.

"We expect to find many, perhaps dozens, of environmental factors over the next few years, with each of them probably contributing to a fraction of autism cases. It is highly likely that most of them operate in conjunction with other exposures and/or with genes"

While little is known about the role of environmental pollutants on autism, air pollution exposure during pregnancy has been seen to have physical and developmental effects on the fetus in other studies. Exposure to air pollution during the first months of life has also been linked to cognitive developmental delay. However, the authors said that this study is the first to link exposure to vehicular pollutants with autism risk, though direct measurements of pollutants were not made.

Data from children with autism and typically developing children, who served as controls, were drawn from the Childhood Autism Risks from Genetics and the Environment (CHARGE) study, a population-based case-control study of preschool children. Children were between the ages of 24 and 60 months at the start of the study and lived in communities around Los Angeles, San Francisco and Sacramento. Population-based controls were recruited from state of California birth files, and were frequency matched to the autism cases by age, gender, and broad geographic area. Each participating family was evaluated in person. All children were assessed; assessment of autism was done using well-validated instruments.

The study examined the locations where the children's families lived during the first, second and third trimesters of their mothers' pregnancies, and at the time of the baby's birth and looked at the proximity of these homes to a major road or freeway. The participants' gestational ages were determined using ultrasound measurements and prenatal records.

Dr. Volk and her colleagues found that living within 309 meters of a freeway (or just over 1000 feet) at birth was associated with a two-fold increase in autism risk. This association was not altered by adjustment for child gender or ethnicity, maximum education in the home, maternal age, or prenatal smoking. The researchers found no consistent pattern of association of autism with proximity to a major road.

Traffic-related air pollutants have been observed to induce inflammation and oxidative stress in toxicological and human studies. The emerging evidence that oxidative stress and inflammation are involved in the pathogenesis of autism supports the findings of this study.

"We expect to find many, perhaps dozens, of environmental factors over the next few years, with each of them probably contributing to a fraction of autism cases. It is highly likely that most of them operate in conjunction with other exposures and/or with genes," said Irva Hertz-Picciotto, PhD, chief of the division of environmental and occupational health in the Department of Public Health Sciences at UC Davis, and principal investigator on the CHARGE study.

Dr. Volk's co-authors on the study include: Rob McConnell, MD, from the Department of Preventative Medicine at USC, Irva Hertz-Picciotto, PhD, and Lora Delwiche, MS, from the University of California at Davis, and Fred Lurmann, of Sonoma Technology, Inc. 2

This study was supported by grants from the National Institute of Environmental Health Sciences, the Environmental Protection Agency, the MIND Institute, the Southern California Environmental Health Sciences Center, Autism Speaks, and the Las Madrinas Endowment on Autism Research, Intervention and Outcomes.

The Saban Research Institute of Children's Hospital Los Angeles is among the largest and most productive pediatric research facilities in the United States, with 100 investigators at work on 186 laboratory studies, clinical trials and community-based research and health services. The Saban Research Institute is ranked eighth in National Institutes of Health funding among children's hospitals in the United States.

Founded in 1901, Children's Hospital Los Angeles is one of the nation's leading children's hospitals and is acknowledged worldwide for its leadership in pediatric and adolescent health. Children's Hospital Los Angeles is one of only seven children's hospitals in the nation – and the only children's hospital on the West Coast – ranked for two consecutive years in all 10 pediatric specialties in the U.S. News & World Report rankings and named to the magazine's "Honor Roll" of children's hospitals.

Established in 1885, the Keck School of Medicine of USC (www.keck.usc.edu) is dedicated to excellence in medical education, patient care and research. Children's Hospital Los Angeles is staffed by physicians and scientists who are on the Keck School faculty. The Keck School is home to a number of leading scientific programs, including the Zilkha Neurogenetic Institute (www.usc.edu/schools/medicine/research/institutes/zni/), a premier translational brain disease institute dedicated to discovering the causes of and developing treatments for a variety of brain disorders. Children's Hospital Los Angeles is a premier teaching hospital and has been affiliated with the Keck School of Medicine of the University of Southern California since 1932.

www.chla.org

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Multimedia Gallery

Photo

Heather Volk, PhD, MPH Community, Health Outcomes and Intervention Research, The Saban Research Institute, Children's Hospital Los Angeles; Keck School of Medicine of the University of Southern California (Photo: Business Wire)

3

Tunnels Concentrate Air Pollution By Up To 1000 Times

The M5 East tunnel in Sydney.

A toxic cocktail of ultrafine particles is lurking inside road tunnels in concentration levels so high they have the potential to harm drivers and passengers, a new study has found.

The study, which has been published in Atmospheric Environment, measured ultrafine particle concentration levels outside a vehicle travelling through the M5 East tunnel in Sydney.

Study co-author and director of Queensland University of Technology's International Laboratory for Air Quality and Health, Professor Lidia Morawska, said road tunnels were locations where maximum exposure to dangerous ultrafine particles in addition to other pollutants occurred.

"The human health effects of exposure to ultrafine particles produced by fuel combustion are generally regarded as detrimental," Professor Morawska said.

"Effects can range from minor respiratory problems in healthy people, to acute myocardial infarction (heart attack) in people with existing heart complaints.

Professor Morawska said the study involved more than 300 trips through the four kilometres of the M5 East tunnel, with journeys lasting up to 26 minutes, depending on traffic congestion.

"What this study aimed to do was identify the concentration levels found in the tunnel. It generated a huge body of data on the concentrations and the results show that, at times, the levels are up to 1000 times higher than in urban ambient conditions," she said.

She said drivers and occupants of new vehicles which had their windows closed were safer than people travelling in older vehicles.

"People who are driving older vehicles which are inferior in terms of tightness and also those riding motorcycles or driving convertibles, these people are exposed to incredibly high concentrations," she said.

"When compared with similar studies reported previously, the measurements here were among the highest recorded concentrations," she said.

Professor Morawska said tunnels were becoming an increasingly necessary infrastructure component in many cities across the world.

"When governments are building tunnels for urban design reasons, they should also consider the impact these tunnels are having on the environment and to people's health," she said.

"The study highlights why governments need to consider how they are going to deal with the air pollution levels inside the tunnel and removal of ultrafine particles in the outside environment."

The study was conducted jointly by Professor Richard de Dear and his doctoral candidate, Mr Luke Knibbs from Macquarie University, in collaboration with Professor Morawska and Dr Kerrie Mengersen from QUT.

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This entry was posted on Thursday, August 27th, 2009 at 9:57 am and is filed under Human Ecology, Climate Change, Sustainability

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Since the launch of the X-Journals several years ago, the original focus expanded to include more scientific news on climate change and related technologies. We have launched a new site to focus even more on survival strategies for increased sustainability. Check it out: EcoSurvivor.com (http://www.ecosurvivor.com) .

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Air pollution from freeway extends further than previously thought

Study finds pollutants 1.5 miles from I-10 during early morning hours

By Sarah Anderson | June 10, 2009

Environmental health researchers from UCLA, the University of Southern California and the California Air Resources Board have found that during the hours before sunrise, freeway air pollution extends much further than previously thought.

Air pollutants from Interstate 10 in Santa Monica extend as far as 2,500 meters — more than 1.5 miles — downwind, based on recent measurements from a research team headed by Dr. Arthur Winer, a professor of environmental health sciences at the UCLA School of Public Health. This distance is 10 times greater than previously measured daytime pollutant impacts from roadways and has significant exposure implications, since most people are in their homes during the hours before sunrise and outdoor pollutants penetrate into indoor environments.

The study was published last month in the journal Atmospheric Environment, with Dr. Shishan Hu, a postdoctoral scholar at the UCLA School of Public Health, as lead author.

"To measure the pollution levels, we equipped an electric vehicle with no emissions of its own with fast-response instruments for gaseous and particulate air pollutants, a GPS and video monitor, and instruments to measure temperature and winds," Winer said. "In both winter and summer of 2008, we drove toward and away from Interstate 10 on a route perpendicular to the freeway in Santa Monica between the hours of 4 a.m. and 7 a.m."

A second striking finding of the study was that although traffic volumes are lower in the pre-sunrise hours, the air pollution concentrations measured by the team were higher than even those during daytime traffic congestion peaks. Concentrations are higher before sunrise even though emissions are lower because of the unique weather conditions. In the pre-sunrise hours, wind speeds are generally very low, and while the wind direction is somewhat variable, the predominant direction is from the northeast in the winter months and the northwest in the summer months.

This means that areas south of Interstate 10 are generally downwind in the pre-sunrise hours and areas north of the freeway are generally upwind; this is consistent with the observation that vehicle-related pollutants are found much further from the freeway on the south side in the pre-sunrise hours, compared with the north side.

"Our research shows that under the low wind speeds and shallow temperature inversions during the early morning, before sunrise, air pollution from freeways is trapped near the surface, limiting dilution and creating a zone of influence many times greater than during the day," said Dr. Suzanne Paulson, a professor in the UCLA Department of Atmospheric and Oceanic Sciences and a co-principal investigator of the study. "These meteorological conditions are very common in the hours before sunrise."

In comparing the winter and summer early mornings, researchers found much higher levels of air pollution in the winter.

"This is because the sun rises later in the winter, so the early morning period captures more of the early morning rush hour," Paulsen said.

"Our findings confirm previous work showing peak levels of ultrafine particles (UFP) immediately adjacent to the

freeway, but we found high concentrations persisted for up to 1.5 miles downwind of the freeway during the pre-sunrise hours," said Dr. Scott Fruin of the USC Keck School of Medicine. "Elevated UFP concentrations also extended up to 600 meters upwind of the freeway, another strong difference from daytime observations, which typically show little or no vehicle-related pollution directly upwind from freeways."

A

In the present study, other pollutants, including nitric oxide and particle-bound polycyclic aromatic hydrocarbons, also extended far from the freeway during the pre-sunrise hours.

Other members of the research team included Dr. Kathleen Kozawa and Steve Mara of the California Air Resources Board, which sponsored the study.

"The study raises more questions about the significant health outcomes caused or exacerbated by freeway traffic," Winer said.

Numerous epidemiologic studies have already shown that traffic-related pollution is linked to increased risk of asthma, respiratory illness, cardiovascular disease and premature mortality.

The researchers recommend that residents living near freeways should consider keeping their windows closed at night and minimize outdoor exercise near major roadways in the hours before sunrise.

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Childhood Asthma Linked to Freeway Pollution

09/21/05

By studying air pollution levels in 10 Southern California cities, USC investigators show that proximity to freeways poses a respiratory risk.

By Alicia Di Rado

"These results suggest that tailpipe pollutants from freeway traffic are a significant risk factor for asthma," said lead author James Gauderman, associate professor of preventive medicine in the Keck School.

Living near a freeway may mean more than the annoying rumble of cars and trucks: For children, it brings an increased risk of asthma, according to researchers in the Keck School of Medicine of USC.

Scientists studying air pollution levels in 10 Southern California cities found that the closer children live to a freeway, the greater their chance of having been diagnosed with asthma. The findings are reported in the November issue of the journal Epidemiology.

Researchers also found that children who had higher levels of nitrogen dioxide, or NO2, in the air around their homes were more likely to have developed asthma. NO2 is a product of pollutants emitted from combustion engines, such as those in cars and trucks.

"These results suggest that tailpipe pollutants from freeway traffic are a significant risk factor for asthma," said lead author James Gauderman, associate professor of preventive medicine in the Keck School. "Considering the enormous costs associated with childhood asthma, today's public policy toward regulating pollutants may merit some re-evaluation."

"These results have both scientific and public health implications," said David A. Schwartz, director of the National Institute of Environmental Health Sciences, the federal agency that funded the study. "They strengthen an emerging body of evidence that air pollution can cause asthma and that exposure to outdoor levels of nitrogen dioxide and other traffic-related air pollutants may be a significant risk factor for this illness."

Researchers looked at the pollution-asthma link in 208 children who were part of the USC-led Children's Health Study, the longest investigation ever into air pollution and kids' health. The study has tracked the respiratory health of children in a group of Southern California cities since 1993.

The investigators placed air samplers outside the home of each student to measure NO2 levels. In addition, they determined the distance of each child's home from local freeways, as well as how many vehicles traveled within 150 meters (about 164 yards) of the child's home. Finally, they estimated traffic-related air pollution levels at each child's home, using models that take weather conditions, vehicle counts and other important factors into account.

In all, 31 children (15 percent) had asthma. Scientists found a link between asthma

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prevalence in the children and NO2 levels at their homes.

For each increase of 5.7 parts per billion in average NO2 – which represents a typical range from low- to high-pollution levels among Southern California cities – the risk of asthma increased by 83 percent. Risk of wheezing and current asthma medication use also rose as NO2 levels increased.

The scientists also found that the closer the students lived to a freeway, the higher the NO2 levels outside their homes. NO2 levels also corresponded with traffic-related pollution estimates from the group's statistical model.

It was not surprising, then, when they found that the closer the students lived to a freeway, the higher the students' asthma prevalence.

For every 1.2 kilometers (about three-quarters of a mile) the students lived closer to the freeway, asthma risk increased by 89 percent. For example, students who lived 400 meters from the freeway had an 89 percent higher risk of asthma than students living 1,600 meters away from the freeway.

Interestingly, the researchers saw that air pollution from freeway traffic influenced NO2 concentrations at homes more strongly than pollution from other types of roads. Traffic counts within 150 meters of homes (which primarily comprised traffic from smaller streets) were only weakly correlated with measured NO2.

In any community, a freeway is a major source of air pollution.

"Cars and trucks traveling on freeways and other large roads may be a bigger source of pollutants that matter for asthma than traffic on smaller roads," Gauderman said. Scientists also find it difficult to get good data on traffic on smaller streets, which may make it harder to find associations between asthma and local traffic.

Gauderman cautioned that researchers do not yet know that NO2 is to blame for the asthma. NO2 travels together with other airborne pollutants, such as particulate matter, so it may be a marker for other asthma-causing pollutants.

Study sites included the cities of Alpine, Atascadero, Lake Elsinore, Lancaster, Long Beach, Mira Loma, Riverside, San Dimas, Santa Maria and Upland.

The Children's Health Study is supported by the NIEHS, California Air Resources Board, the Southern California Particle Center and Supersite, the Environmental Protection Agency and the Hastings Foundation.

SEARCH USC NEWS

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Long-term Air Pollution Exposure Is Associated with Neuroinflammation, an Altered Innate Immune Response, Disruption of the Blood-Brain Barrier, Ultrafine Particulate Deposition, and Accumulation of Amyloid β-42 and α-Synuclein in Children and Young Adults

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Abstract

Air pollution is a serious environmental problem. We investigated whether residency in cities with high air pollution is associated with neuroinflammation/neurodegeneration in healthy children and young adults who died suddenly. We measured mRNA cyclooxygenase-2, interleukin-1β, and CD14 in target brain regions from low (n = 12) or highly exposed residents (n = 35) aged 25.1 ± 1.5 years. Upregulation of cyclooxygenase-2, interleukin-1β, and CD14 in olfactory bulb, frontal cortex, substantia nigrae and vagus nerves; disruption of the blood-brain barrier; endothelial activation, oxidative stress, and inflammatory cell trafficking were seen in highly exposed subjects. Amyloid β42 (Aβ42) immunoreactivity was observed in 58.8% of apolipoprotein E (APOE) 3/3 < 25 y, and 100% of the APOE 4 subjects, whereas α-synuclein was seen in 23.5% of < 25 y subjects. Particulate material (PM) was seen in olfactory bulb neurons, and PM < 100 nm were observed in intraluminal erythrocytes from lung, frontal, and trigeminal ganglia capillaries.

Exposure to air pollution causes neuroinflammation, an altered brain innate immune response, and accumulation of Aβ42 and α-synuclein starting in childhood. Exposure to air pollution should be considered a risk factor for Alzheimer's and Parkinson's diseases, and carriers of the APOE 4 allele could have a higher risk of developing Alzheimer's disease if they reside in a polluted environment.

α-synuclein Alzheimer's disease air pollution amyloid β42 neuroinflammation Parkinson's disease ultrafine particulate matter

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CALIFORNIA

American Lung Association in California

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AT-RISK GROUPS

County	Total Population	Under 18	65 & Over	Lung Diseases: Pediatric Asthma	Lung Diseases: Adult Asthma	Lung Diseases: Chronic Bronchitis	Lung Diseases: Emphysema	Cardio-vascular Disease	Diabetes	Poverty Estimate All Ages
Alameda	1,474,368	347,294	160,789	32,693	94,756	48,721	17,779	395,838	98,066	150,203
Amador	38,238	6,228	7,462	586	2,723	1,438	641	12,816	3,212	3,333
Butte	220,337	45,934	33,068	4,324	14,641	7,514	2,996	63,315	15,671	44,569
Calaveras	46,843	8,464	8,523	797	3,278	1,745	771	15,524	3,905	5,336
Colusa	21,204	6,105	2,450	575	1,264	645	242	5,288	1,305	2,816
Contra Costa	1,029,703	249,240	124,036	23,463	65,998	34,368	13,216	286,262	71,348	96,183
El Dorado	176,075	37,896	19,950	3,567	11,707	6,118	2,301	50,538	12,618	13,692
Fresno	909,153	270,512	89,615	25,465	53,191	26,798	9,390	213,027	52,230	197,265
Glenn	28,237	7,759	3,461	730	1,719	882	338	7,301	1,807	4,713
Humboldt	129,000	26,222	16,670	2,468	8,642	4,447	1,690	36,746	9,107	24,794
Imperial	163,972	47,801	17,493	4,500	9,663	4,855	1,732	38,843	9,511	32,833
Inyo	17,136	3,702	2,779	348	1,150	614	266	5,417	1,365	1,964
Kern	800,458	238,789	71,678	22,479	46,597	23,265	7,790	181,207	44,207	156,128
Kings	149,518	40,715	11,487	3,833	8,930	4,349	1,308	32,288	7,759	22,566
Lake	64,866	13,981	10,479	1,316	4,325	2,278	968	19,868	4,976	11,462
Los Angeles	9,862,049	2,549,168	1,054,932	239,969	611,881	311,413	112,035	2,508,754	618,355	1,482,051
Madera	148,333	41,276	15,307	3,886	8,910	4,482	1,575	35,653	8,734	25,275
Marin	248,794	47,992	39,344	4,518	17,228	9,250	3,960	81,284	20,524	17,007
Mariposa	17,976	3,112	3,377	293	1,265	669	296	5,948	1,492	2,388
Mendocino	86,221	19,013	13,091	1,790	5,722	3,025	1,267	26,228	6,579	15,032
Merced	246,117	76,722	24,433	7,222	14,091	7,080	2,490	56,327	13,791	52,005
Monterey	408,238	111,869	41,550	10,531	24,728	12,506	4,412	99,791	24,517	49,360
Napa	133,433	30,039	19,339	2,828	8,750	4,567	1,856	38,965	9,720	11,511
Nevada	97,118	17,384	17,481	1,636	6,832	3,661	1,624	32,666	8,239	8,848
Orange	3,010,759	765,649	342,841	72,075	188,534	96,726	35,888	790,757	195,691	294,758
Placer	341,945	74,348	52,148	6,999	22,569	11,699	4,776	99,841	24,827	22,873

(1)

CALIFORNIA

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	HIGH OZONE DAYS 2006–2008					HIGH PARTICLE POLLUTION DAYS 2006–2008						
						24 Hour					Annual	
County	Orange	Red	Purple	Wgt. Avg	Grade	Orange	Red	Purple	Wgt. Avg	Grade	Design Value	Pass/ Fail
Alameda	15	3	0	6.5	F	8	0	0	2.7	D	9.6	PASS
Amador	42	7	0	17.5	F	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Butte	57	3	0	20.5	F	11	4	0	5.7	F	13.4	PASS
Calaveras	49	7	0	19.8	F	2	0	0	0.7	B	8.4	PASS
Colusa	2	0	0	0.7	B	3	0	0	1.0	C	*	INC
Contra Costa	24	0	0	8.0	F	17	0	0	5.7	F	9.0	PASS
El Dorado	104	26	1	48.3	F	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Fresno	148	31	2	66.2	F	139	14	0	53.3	F	17.7	FAIL
Glenn	2	0	0	0.7	B	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Humboldt	0	0	0	0.0	A	0	0	0	0.0	A	7.5	PASS
Imperial	71	2	0	24.7	F	8	2	0	3.7	F	12.0	PASS
Inyo	31	0	0	10.3	F	6	0	1	2.7	D	6.4	PASS
Kern	228	74	4	115.7	F	128	25	0	55.2	F	21.5	FAIL
Kings	103	10	1	40.0	F	35	2	0	12.7	F	17.0	FAIL
Lake	0	0	0	0.0	A	1	1	0	0.8	B	5.3	PASS
Los Angeles	169	60	9	92.3	F	53	4	0	19.7	F	15.6	FAIL
Madera	40	2	0	14.3	F	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Marin	0	0	0	0.0	A	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Mariposa	95	5	0	34.2	F	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Mendocino	0	0	0	0.0	A	0	0	0	0.0	A	6.5	PASS
Merced	69	9	1	28.2	F	32	1	0	11.2	F	*	INC
Monterey	1	0	0	0.3	B	0	0	0	0.0	A	7.1	PASS
Napa	2	0	0	0.7	B	DNC	DNC	DNC	DNC	DNC	DNC	DNC
Nevada	122	12	0	46.7	F	5	2	0	2.7	D	7.2	PASS
Orange	37	4	0	14.3	F	23	1	0	8.2	F	*	INC
Placer	97	14	0	39.3	F	3	0	0	1.0	C	9.6	PASS

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People Near Freeways Are Exposed To 30 Times The Concentration Of Dangerous Particles

ScienceDaily (Oct. 21, 2002) — People who live, work or travel within 165 feet downwind of a major freeway or busy intersection are exposed to potentially hazardous particle concentrations up to 30 times greater than normal background concentrations found at a greater distance, according to two recently published UCLA studies. The studies -- published in the Journal of the Air and Waste Management Association and in Atmospheric Environment -- show that proximity to a major freeway or highway dramatically increases exposure to "ultrafine" particles (tiny particles less than 0.1 micrometers in diameter), which are linked to neurological changes, mild pulmonary inflammation and cardiovascular problems. The U.S. Environmental Protection Agency (EPA) currently regulates particles less than 2.5 micrometers in diameter, and ultrafines represent the very smallest particles inhaled by the public.

Traffic-related air pollution is of great concern to Los Angeles, which has the most severe particle air-quality problem in the United States. The Los Angeles Basin is home to more than 15 million residents and 10 million vehicles contributing to its daily traffic. Motor vehicle emissions represent the most significant source of ultrafine particles. Moreover, recent toxicological studies have shown that ultrafine particles are more toxic than larger particles, potentially leading to increased mortality and illness with increased exposure to particulate matter.

"We believe this is the first study conducted in the United States that provides a detailed spatial profile of ultrafine particles near freeways," said William C. Hinds, a professor of environmental health sciences in the UCLA School of Public Health, who co-authored the studies with Yifang Zhu, a doctoral candidate in the School of Public Health.

The studies, conducted through the Southern California Particle Center and Supersite (SCPCS), assessed the size-distribution and concentration of the tiny ultrafine particles near major freeways. The first study focused on Interstate 405, one of the nation's busiest freeways, with 93 percent of the traffic composed of gasoline-powered cars. The second study looked at the 710 freeway, which has more than 25 percent of its traffic derived from heavy-duty diesel trucks.

By measuring the number of particles and their size at varying distances from the 405 and 710, Hinds and Zhu concluded that the number of ultrafine particles downwind near both freeways was approximately 25 to 30 times greater than the number upwind. The drop in the number of ultrafine particles occurred rapidly with increasing distance from the freeway, falling to 30 percent of peak concentration at 330 feet. The rapid decrease and dilution in particle concentration was due to several factors, including atmospheric dispersion, coagulation, and wind direction and speed.

Both Hinds and Zhu concur that better understanding of the size and concentration of ultrafine particles is vital, particularly in a city with 85 million vehicle-miles traveled on its freeways on an average day.

"The objectives of the study include providing scientists with a way to predict exposure concentrations to

ultrafine particles near freeways in order to facilitate health studies and provide data for the development of an air-quality standard for ultrafine particles," Zhu said.

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The studies also examined the concentrations of carbon monoxide (CO), black carbon (BC) and particle mass. Both CO and BC concentrations are closely related to vehicle emissions. Like ultrafines, CO and BC concentrations decreased significantly (70 percent to 80 percent) within the first 330 feet downwind of the freeway. This confirms the notion that vehicular exhaust is a major source of these pollutants near a major roadway.

The SCPCS -- housed in the School of Public Health and the Institute of the Environment at UCLA, and funded by the EPA's Science To Achieve Results (STAR) program and California Air Resources Board -- brings together outstanding scientists from leading universities throughout the nation to create dynamic new ways of investigating the health effects of particulate matter and to secure the protection of public health by better informing policy.

Funding for the studies was provided by the EPA and the California Air Resources Board, and supported by the National Institute of Environmental Health Sciences. Other study authors include Constantinos Sioutas, deputy director of SCPCS and associate professor of environmental engineering at USC, and Seongheon Kim and Si Shen of the department of civil and environmental engineering at USC.

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SOUTHERN CALIFORNIA PARTICLE CENTER AND SUPERSITE (SCPCS)
Progress report

(9)

Period Covered by the Report: June 1, 2002 – May 31, 2003
Date of Report: June 30, 2003
EPA Agreement Number: R827352
Title: Southern California Particle Center and Supersite (SCPCS)
Investigators: John R. Froines [jfroines@ucla.edu] (Center Director – UCLA)
Arthur K. Cho, Jon Fukuto, William C. Hinds, Antonio Miguel, André E. Nel, Beate Ritz, Robert Schiestl, Richard P. Turco, Arthur M. Winer and R.C. Yu - UCLA
Henry Gong and William Linn – Rancho Los Amigos
Jack Harkema - Michigan State University
Sonoma Technology - Fred Lurmann
Judith Charles - University of California, Davis
Michael T. Kleinman and Robert Phalen – Univeristy of California, Irvine
Janet Arey and Roger Atkinson – University of California, Riverside
Edward L. Avol, Kiros Berhane, William (Jim) Gauderman, Nino Kunzli, Rob McConnell, John M. Peters, Costantinos Sioutas and Dan Stram – University of Southern California
Yoshito Kumagai – University of Tsukuba, Japan
Institutions: University of California at Los Angeles – lead campus; Michigan State University; Rancho Los Amigos Medical Center; Sonoma Technology; University of California, Davis; University of California, Irvine; University of California, Riverside; University of Southern California; University of Tsukuba, Japan.
Research Category: Airborne Particulate Matter (PM) Centers
Project Period: June 1, 1999 – May 30, 2004

Overview of the Southern California PM Center:
The overall objective of the Southern California Particle Center and Supersite (SCPCS) is to bring together outstanding scientists from the leading universities in Southern California to identify and conduct high priority research to better understand the effects of particulate matter (PM) and ensure protection of public health. The SCPCS makes use of an integrated approach to address exposure, dosimetry, toxicology, and epidemiology that are identified in EPA's RFA. This integration is accomplished by seeking out and involving in the Center some of the major figures in air quality and environmental health. A team has been assembled for SCPCS that is committed to the need for strong cross- and interdisciplinary programs of research in order to address the challenging issues posed by PM.

The Los Angeles Basin is home to more than 14 million individuals who breathe the most polluted air in the nation. The research projects in this Center will provide the airshed with a detailed characterization by exposure studies to assess PM size, composition, and spatial variability. Toxicology investigations are directed toward a fundamental understanding of the mechanisms and the chemical and physical components of PM responsible for health effects. Epidemiologic research is likely to provide new information to enhance our ability to detect human health effects from ambient air pollution.

Supplemental Keywords:
Airborne particulate matter, aerosol, size distribution, particle concentrator, NRC priorities, mechanism, quinones, allergens, bioaerosols, dosimetry, children's study, indoor exposure, exposure assessment, ultrafine, fine and coarse particles, REHEX, asthma, PAHs, clinical human exposures, source-receptor, measurement error, study design, susceptible populations, geo-code, toxicology, epidemiology, regional modeling, source/receptor analysis, Southern California, Los Angeles basin, photochemistry, meteorology, trajectory modeling, peroxides.

Relevant Web Sites: www.scpcs.ucla.edu

Research Themes
The principal theme of the Southern California Particle Center and Supersite (SCPCS) is **"Mobile Source Pollution and Health Effects".** All of the research within the SCPCS is intended to address specific priorities of the National Research Council (NRC).

The funding from EPA has brought together faculty from UCLA, USC, UC Riverside, UC Davis, UC Irvine, Rancho Los Amigos, Sonoma Technology, Michigan State University, and the Univeristy of Tsukuba, Japan. Participating faculty within the SCPCS comprise a wide range of disciplines including toxicology, epidemiology, biostatistics, immunology, pharmacology, medicine, atmospheric sciences, atmospheric and environmental chemistry, exposure assessment, and aerosol science. The challenge to the SCPCS has been to bring together a wide range of expertise and the success of the Center has been our ability to link disciplines and researchers to a well defined set of research activities. That linkage also includes interaction and funding from the California Air Resources Board (ARB) and the South Coast Air Quality Management District (SCAQMD). Given the extremely poor air quality in Southern California, it is unfortunate that a Center similar to SCPCS had not been established many years ago. There is a continuing need for this Center in the future. To date, the SCPCS has generated a wide range of projects and has produced important findings and data within the overall theme and the hypotheses described below.

A second key theme also guides the research of the Center: **"Identification of the important physical/chemical characteristics of airborne PM responsible for the adverse health effects associated with PM and co-pollutant exposures."**

A key feature of the research in the SCPCS is the linkage between exposure assessment/PM characterization and toxicological and human health outcomes. All health studies involve simultaneous exposure assessment/PM characterization.

The SCPCS research programs may be subdivided into three general areas:

1. **Studies emphasizing investigation of the biological mechanisms of PM effects in relation to PM physical and chemical characteristics;**

2. **Studies of emission sources and related adverse health effects;**

3. **Varying spatial and temporal patterns of ambient PM and co-pollutants and resulting health effects; particular emphasis on the role of atmospheric chemistry.**

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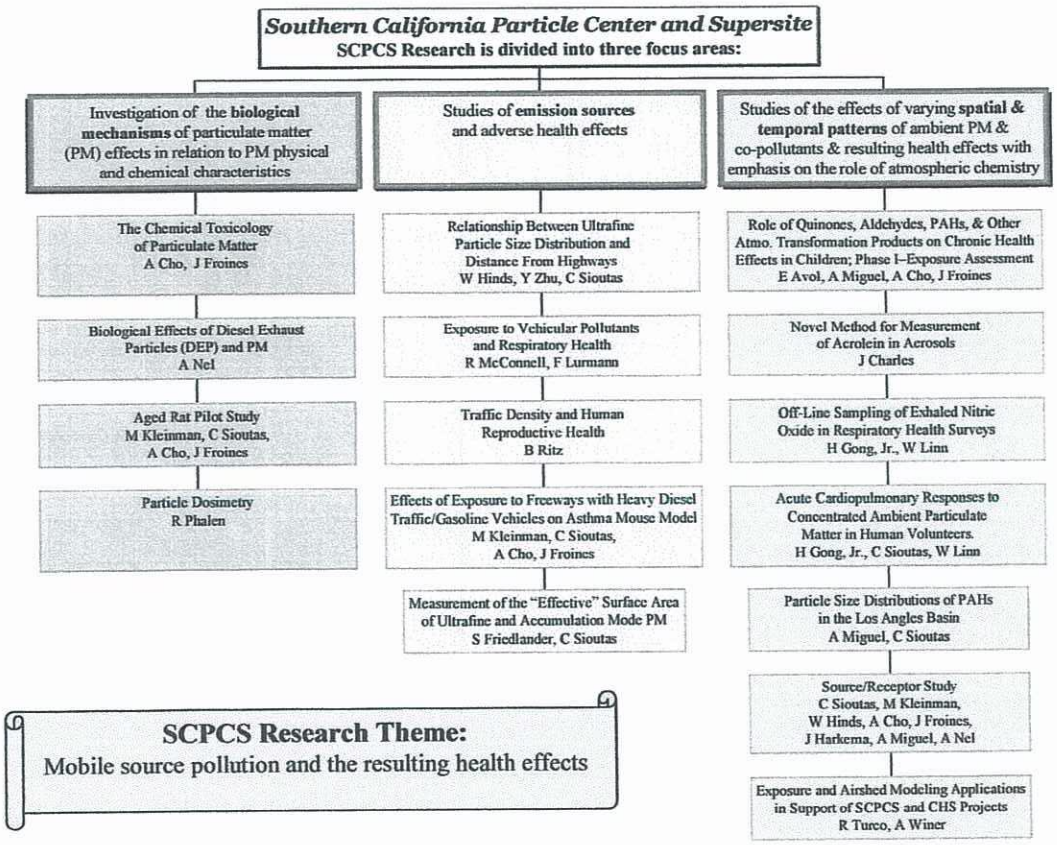
All studies in the SCPCS are being conducted within the context of the secondary theme and "the investigation of the biological mechanisms of PM effects". Research areas 2 and 3 are complementary and fundamentally linked with 1. All three focus on the role of organic and metal constituents of PM. The research progress will be summarized in the sections below. All studies in the SCPCS are enhanced by the availability of ultrafine, fine and coarse mobile concentrators which are linked to in vitro sample collection, in vivo studies, and human clinical studies described in this report.

The progress reports for each Center project are reported by theme as below:



1. Investigation of the biological mechanisms of particulate matter (PM) effects in relation to PM physical and chemical characteristics

- **The chemical toxicology of particulate matter**
- **Biological effects of diesel exhaust particles (DEP) and PM**
- **Effects of exposure to fine and ultrafine concentrated ambient particles near a heavily trafficked freeway in geriatric rats**
- **Particle dosimetry**

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Study of ultrafine particles near a major highway with heavy-duty diesel traffic

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Received 6 March 2002; accepted 20 May 2002. Available online 28 August 2002.

Abstract

Motor vehicle emissions usually constitute the most significant source of ultrafine particles (diameter <0.1 μm) in an urban environment. Zhu et al. (J. Air Waste Manage. Assoc., 2002, accepted for publication) conducted systematic measurements of the concentration and size distribution of ultrafine particles in the vicinity of a highway dominated by gasoline vehicle. The present study compares these previous measurements with those made on Interstate 710 freeway in Los Angeles. The 710 freeway was selected because more than 25% of the vehicles are heavy-duty diesel trucks. Particle number concentration and size distribution in the size range from 6 to 220 nm were measured by a condensation particle counter and a scanning mobility particle sizer, respectively. Measurements were taken at 17, 20, 30, 90, 150, and 300 m downwind and 200 m upwind from the center of the freeway. At each sampling location, concentrations of carbon monoxide (CO) and black carbon (BC) were also measured by a Dasibi CO monitor and an Aethalometer, respectively. The range of average

(10)

concentration of CO, BC and total particle number concentration at 17 m was 1.9–2.6 ppm, 20.3–24.8 μg/m^3, 1.8×10^5–3.5×10^5/cm^3, respectively. Relative concentration of CO, BC and particle number decreased exponentially and tracked each other well as one moves away from the freeway. Both atmospheric dispersion and coagulation appears to contribute to the rapid decrease in particle number concentration and change in particle size distribution with increasing distance from the freeway. Average traffic flow during the sampling periods was 12,180 vehicles/h with more than 25% of vehicles being heavy-duty diesel trucks. Ultrafine particle number concentration measured at 300 m downwind from the freeway was indistinguishable from upwind background concentration. These data may be used to estimate exposure to ultrafine particles in the vicinity of major highways.

Author Keywords: Ultrafine particles; Freeways; Diesel; Carbon monoxide; Black carbon

Article Outline

1. Introduction
2. Experimental
2.1. Description of sampling site
2.2. Sampling and instrumentation
3. Results and discussion
3.1. Wind effects
3.2. Traffic effects
3.3. Change in ultrafine particle size distribution with increasing distance
3.4. Decay of carbon monoxide, black carbon and particle number concentration
4. Conclusions and summary
Acknowledgements
References

Corresponding author; email: whinds@ucla.edu

← Back to Original Article

Inhaling a heart attack

Research links smog to devastating effects not just on lungs but on hearts, brains and fetal development.

June 23, 2009 | Greg Critser | Greg Critser is the author of "Fat Land," "Generation Rx" and the forthcoming "Eternity Soup: Inside the Quest to End Aging."

Not long ago, Jesus Araujo, a cardiology researcher at UCLA, parked a cage full of transgenic mice alongside the 110 Freeway. As a control, he placed another group in a less-polluted space on the Westside. Araujo was interested in learning more about how smog affects the heart and whether bad air could help explain the persistence of heart disease after 25 years of cholesterol management, statins and endless lifestyle advice.

On collecting the mice several weeks later, Araujo made a troubling discovery: The mice exposed to freeway air presented a terrible blood profile. Their HDL, the so-called good cholesterol, had been rendered dysfunctional.

"We've known for some time that bad air is associated with heart problems," Araujo said. "But this got our attention."

The ultrafine particles in polluted air, he posited, "could be undermining so much of the progress we've made in this area."

The epidemiological community has long worried about the effect of smog on the lungs. But research on the health effects of bad air is now expanding, and the news is not good.

Smog, it turns out, can have devastating effects not just on lungs but on hearts, brains and fetal development.

Work coming out of Mexico City, increasingly L.A.'s sister city in the environmental sciences, has documented how amyloid plaque, one of two suspect brain proteins associated with Alzheimer's, increases with exposure to air particles, especially in children and young adults. Research originating at UCLA and USC shows how ultrafine particles, or UFP, initiate the so-called inflammatory cascade that leads not only to brain diseases but asthma and chronic obstructive pulmonary disease.

New research in environmental pediatrics has demonstrated a consistent, dose-dependent relationship between expectant mothers living in high-emissions-adjacent housing and premature births, low birth weights, birth defects and respiratory diseases. In a recent report, the UCLA Institute of the Environment concluded that the problems were of such magnitude as to "require drastic changes to motor vehicle and transportation systems" over the next decades.

USC scholars are blazing new paths as well. Over the last 20 years, they have invented ways to concentrate particles from the freeway, assess their specific toxicity in human doses and then test various hypotheses with lab animals genetically engineered to physiologically respond like humans. They can even track real-time daily human exposures to ultrafine particles.

On any given day in Los Angeles, mobile smog units are out measuring how pollution ebbs and flows on a neighborhood-by-neighborhood basis. Research subjects wear "personal ambient pollution" backpacks to track how individuals experience different loads of smog throughout their day, part of which may be spent in a low-pollution environment, part in a high. Through modern genomics, we also now know that several highly prevalent gene mutations make some people more susceptible to pollution, and that others make them less susceptible.

What -- besides moving to Fargo -- can we do? A few recent successes are heartening, among them new regulations on truck exhaust and improvements to filtering systems used by schools that are near freeways. And, as usual, public health officials are working to increase awareness and advocating for new regulations and funds for more research.

But we need to go further. Every person in Southern California should be able to find out what the "inflammatory load" is in their neighborhood; they also should know where the region's "emissions hot spots" are located. (One way might be to amend this newspaper's weather page to include readings of ultrafine particles within the critical 1,500 feet of major motorways.) And we need an independent counterpart to the Southern California Air Quality Management District, one charged with implementing breakthrough science to mitigate the effect of ultrafine particles on health.

As was the case in the city's first war on smog about half a century ago, there will be resistance to this new body of science because it brings unwelcome news. Industry will hate any new regulations. Some solutions will surely upend traditional political alliances, pitting affordable-housing advocates, for example, against those advocating environmental justice.

With leadership, Los Angeles can find a way to reconcile those interests. It did so 40 years ago, and it can do so now. An increasingly hazy world is waiting.

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Global Trade Comes Home: Community Impacts of Goods Movement

Formal Correction: This article has been **formally corrected** to address the following errors.
1. In the February Spheres of Influence article, the first sentence of the second paragraph under the subhead "Community Response" should have read "In the 1990s, just a few groups such as the Sierra Club, the Environmental Health... (read formal correction)

Andrea Hricko

Citation: Hricko A 2008. Global Trade Comes Home: Community Impacts of Goods Movement. Environ Health Perspect 116:A78-A81. doi:10.1289/ehp.116-a78

Online: 1 February 2008

For many U.S. residents, 2007 was a year of heightened awareness of some of the problems of global trade. Extensive recalls of melamine-tainted pet food in the spring followed by even larger toy recalls in the summer and fall raised consumer concerns about how the United States can ensure the safety of products shipped in from overseas. The *Salt Lake Tribune* and the *Wall Street Journal* detailed injuries and illnesses threatening the health of Chinese workers making products for export to the United States. And on 15 December 2007, a *New York Times* feature detailed the practice of farming fish in toxic Chinese waters for export to the United States and other countries.

While these news stories demonstrate some of the pitfalls of globalization, much less attention has focused on air pollution and other community-level impacts in the United States, as toys, electronics, food, and other imports travel through ports, then to trucks, trains, warehouses, and stores in a complex system called "goods movement." Along the route, residents are exposed to diesel exhaust and other vehicle emissions, noise from truck-congested roads, bright lights from round-the-clock operations, and other potential health threats.

Transportation experts refer to these impacts simply as "externalities" of transport, but to community residents they can directly harm the quality of daily life. As ports and goods movement activity expands throughout the United States, a major challenge is how to make its health and community impacts a more central part of policy discussions.

Economic Benefits, Community Costs

Economic development advocates call the side-by-side ports of Los Angeles and Long Beach Southern California's "economic engine." Combined, they handle the most containers of any U.S. port. With more

than 40% of all imports for the entire United States coming through the Los Angeles/Long Beach port complex, according to the U.S. Department of Transportation, the ports are critical to the national economy. A March 2007 national economic impact study by the twin ports reported that imports coming through the complex generated jobs, income, and tax revenue in every state of the nation.

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While recognizing the economic importance of international trade, the U.S. Environmental Protection Agency (EPA) has called the movement of freight a "public health concern at the national, regional and community level." In a 22 August 2007 *Federal Register* announcement of a meeting of its National Environmental Justice Advisory Council (NEJAC), the EPA also described mounting evidence that local communities adjacent to ports and heavily trafficked goods movement corridors are the most significantly impacted by the goods movement system.

The ports of Los Angeles/Long Beach combined contribute more than 20% of Southern California's diesel particulate pollution and are the single largest source of pollution in Southern California, according to the South Coast Air Quality Management District (AQMD), the region's air quality regulatory agency. The California Air Resources Board (CARB), in its 2006 *Emission Reduction Plan for Ports and Goods Movement*, calculated that in California alone there are 2,400 premature heart-related deaths related to port and goods movement pollution, 62,000 cases of asthma symptoms, and more than 1 million respiratory-related school absences every year. Nationwide, reports James Corbett of the University of Delaware and colleagues in the 15 December 2007 issue of *Environmental Science & Technology*, an estimated 60,000 lives are lost prematurely every year due to ship emissions, which are virtually unregulated.

Recent research findings about living close to traffic emissions add to concerns. A study by investigators at the University of Southern California (USC), published 17 February 2007 in *The Lancet*, showed that children living near freeway traffic had substantial deficits in lung function development between the ages of 10 and 18 years, compared with children living farther away. "Since lung development is nearly complete by age eighteen," says lead author W. James Gauderman, "an individual with a deficit at this time will probably continue to have less than healthy lung function for the remainder of his or her life."

Other studies published in the February 2003 and September 2005 issues of *EHP* linked traffic exposure to increased risk for low birth weight and premature birth. A new study published 6 December 2007 in the *New England Journal of Medicine* showed that adults with asthma who spent just 2 hours walking on a street with heavy diesel traffic suffered acute transient effects on their lung function along with an increase in biomarkers that indicate lung and airway inflammation. In addition, research by the EPA-funded Southern California Particle Center at the University of California, Los Angeles, published in the April 2003 issue of *EHP*, demonstrated that ultrafine particles from incomplete combustion of engine fuels and lubricating oils can bypass the body's defense mechanisms, gain entry to cells and tissues, and alter or disrupt normal cellular function.

Regulation to Date

In 2005, CARB issued guidelines that recommend avoiding construction of new schools and homes within a mile of a railyard or 500 feet of a busy highway. A few years earlier, California legislators, citing health effects research findings, passed SB 352, a law prohibiting building new schools within 500 feet of a busy

road or freeway. But the 2003 law permits several loopholes, such as allowing a school district to show that it is able to mitigate traffic emissions so that pupils and staff will suffer no significant health risk. The law also requires that a school district verify that any railyard within a quarter mile of a new school will not present a public health threat. Some school districts, in the scramble to build new facilities, are continuing to site new schools near freeways and rail operations.

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Conversely, railyards and freeways also continue to be proposed in close proximity to schools and homes, such as a proposed truck expressway to speed trucks away from the Southern California ports, which would pass within 100 feet of homes and 700 feet of a local school. The draft environmental impact statement (EIS) for the project, issued in August 2007 by the California Department of Transportation (Caltrans) acknowledges the scientific research: "Some recent studies have reported that proximity to roadways is related to adverse health outcomes—particularly respiratory problems." But the EIS goes on to say that using these studies to determine if there will be adverse impacts from the truck expressway project is premature.

According to Ron Kosinski, deputy district director for the Caltrans district covering Los Angeles County, the Federal Highway Administration (FHWA) is delaying any policy decisions related to health effects from proximity to traffic until the conclusion of a review of all the studies by the Health Effects Institute—a report that is not expected for several years. FHWA spokesman Doug Hecox says, "[The agency is] not suggesting that nothing should be done. But there are no conclusive studies right now drawing a direct relationship between the number of trucks on a road and the percent of impairment of an affected child."

Environmental, community, and public health groups have long pressured Los Angeles and Long Beach port authorities to take action on port pollution. In 2006, an historic agreement called the Clean Air Action Plan (CAAP) was signed, vowing that the ports would reduce air pollution by 45% within the next 5 years. However, some community and environmental groups are concerned that the deadlines set in the CAAP are slipping.

Port of Los Angeles executive director Geraldine Knatz responds that the CAAP "is a five-year process that requires major investment in construction and new equipment, and in the interim, cargo movement through our ports continues." Knatz also points to a new program to reduce port-related truck emissions by 80% by 2012—a $2 billion initiative that she says "cannot simply happen overnight." In December 2007, both ports adopted container fees to fund the replacement of 17,000 polluting big-rig trucks with new models that meet tighter EPA diesel emission standards.

At the state level, CARB issued new rules in December 2007 that would require ships to plug in to electricity rather than using diesel auxiliary engines when docked in the harbor and that would require stricter emissions standards for trucks frequenting ports and railyards. The South Coast AQMD has long championed stricter controls on ports and rail operations to protect public health, as well as environmental justice considerations. In 2006 the agency issued rules to reduce pollution from idling locomotives in railyards, but railroad companies sued to block them. In 2007 a Los Angeles–based U.S. District Court judge struck down the agency's rules, arguing that it lacked authority to adopt them; the agency is appealing the decision.

According to the South Coast AQMD, emissions from ships are also underregulated, with no significant international or federal emission control regulations. In 2004, the EPA announced plans to put in place new

standards for ships and locomotives. On 15 January 2008, the Greenwire news service reported these standards were under review at the White House Office of Management and Budget, which must approve them before the EPA can sign off on them.

Increased Trade Expected (12)

The health and environmental justice impacts of port, rail, and trucking pollution are not limited to California. In South Carolina, for example, environmental groups and homeowners are troubled by anticipated impacts of a proposed terminal expansion at the old Charleston Navy Base, which the South Carolina Coastal Conservation League says will triple the container volume through Charleston and generate thousands more truck trips a day through a low-income black neighborhood. "An access road and off-ramp will go right through our Rosemont community as trucks leave the port terminal for the nearby interstate highway," New Rosemont Neighborhood Association president Nancy Button told participants of a recent community–academic conference on port health impacts held in Los Angeles.

According to *The Journal of Commerce Online*(*JoC*), a news magazine covering international trade and goods movement, many U.S. ports are expanding in hopes of capitalizing on rising international trade volumes. Historically, says maritime industry economist Bill Ralph, as quoted in the 16 January 2008 *JoC*, international container trade in the United States has an annual growth of about 7%. In 2006, U.S. containerized imports grew by 11%. But in 2007, says Ralph, they increased by only 3%, due to a slowdown in the housing and auto markets. Economist Walter Kemmsies, quoted 2 days earlier in the *JoC*, predicts that U.S. container trade will return to its normal 7% annual growth within the next 2 years and continue to grow steadily—even faster if the United States enters into more free trade agreements.

The EPA Office of Environmental Justice (OEJ) has taken note of the growth trends and the rising environmental health concerns about port and goods movement expansion. In August 2007, acting OEJ director Charles Lee appointed a new working group to study the impacts of ports and goods movement through an "environmental justice lens," with a report expected in June 2008. Land use decision making will be 1 element in the report, along with community participation, regulatory mechanisms, innovative technologies, and more.

Projected increases in foreign trade, along with many states' planned expansion of highways, rail facilities, and ports to handle Asian imports, cause concern about increased air pollution if regulations to reduce emissions do not keep pace with trade growth. In the 22 August 2007 *Federal Register*, the EPA noted that the anticipated increase in trade will have air quality impacts, and the agency threw out a challenge to the ports and companies involved in goods movement: "It is becoming increasingly important that these entities operate sustainably, i.e., economically viable, environmentally and socially responsible, safe and secure."

Community Response

As this global goods movement system expands, communities across North America are now recognizing that they are facing similar circumstances and common conflicts. And they are banding together, in small and large coalitions, to address the impacts.

In the 1990s, just a few groups such as the Sierra Club, the Environmental Health Coalition, the OEJ, and homeowners near the ports were focused on the effects of the global supply chain. But 2001 turned out to be a watershed year. That year, the Natural Resources Defense Council, the Coalition for Clean Air, Communities for a Better Environment, and 2 harbor-based homeowner's associations filed a lawsuit challenging the Port of Los Angeles's environmental review of planned construction for a major shipping terminal. Two years later they won a $50 million landmark settlement from the city requiring environmental mitigations, such as the "plug in" rule issued by CARB in December. A new era had begun—one that started to shift public attention from the role of international trade simply as the region's major economic engine to the potential perils of uncontrolled goods movement expansion.

That same year, the NIEHS-funded Southern California Environmental Health Sciences Center, based at USC, held a town meeting to share its research findings with community groups, residents, workers, and policy makers. In turn, scientists heard the emerging concerns of residents about diesel emissions near the ports, railyards, and warehouses. Research findings on the health impacts of air pollution soon began to find their way into policy debates on goods movement and port expansion.

Over the next 5 years, multiple partnerships started to come together to specifically address issues of ports and goods movement in California. Among the collaborative efforts active today are the Ditching Dirty Diesel Collaborative based in Oakland, aimed at developing a regional strategy to reduce diesel emissions; the Trade, Health & Environment (THE) Impact Project, a community–academic collaborative aimed at elevating community voices in the goods movement policy debate and using science-based information to inform public policy; the Port Work Group of Green LA, which aims to ensure that the Port of Los Angeles becomes truly green, with the support of the city's mayor; and a broad-based coalition aimed at improving wages and working conditions (including less-polluting vehicles) for port truck drivers.

Elsewhere, residents in a neighborhood near the Port of Seattle have been counting big-rig trucks parked overnight in their community in an effort to keep port-related pollution, safety hazards, and blight out of their neighborhoods. In Arizona, a school superintendent has asked officials not to enact zoning changes that would allow construction of a major intermodal facility (a railyard at which cargo is transferred between trucks and trains) across the street from a local elementary school. And on Long Island, residents are asking the state of New York to reconsider its plans to build an intermodal facility near residential communities and a wildlife preserve.

Tools for Action

Many groups impacted by ports and goods movement came together in late 2007 at Moving Forward, the first North American community-oriented gathering on this topic, which was organized by THE Impact Project and cosponsored by private groups along with NIEHS- and EPA-funded centers.

Participants shared information on current health research related to goods movement, community concerns about health impacts, future goods movement expansion projects (such as plans to deepen the harbor at the Port of Savannah, Georgia, to handle larger ships carrying twice as many containers), and community efforts to effect change. Presenters described tools for action, such as methods for mapping goods movement activities in communities; understanding who the key goods movement stakeholders and decision makers are; ways to incorporate credible, current scientific research findings into educational and

policy efforts; and new methods for developing health impact assessments.

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Eric Kirkendall from Kansas was struck by the commonalities at the conference. Back home, he had formed the Johnson County Intermodal Coalition in response to proposals to build an intermodal railyard near the small town of Gardner and surround his 4-acre homestead on 3 sides with 12-acre warehouses. Kirkendall says, "We sometimes feel alone in Kansas. But by the end of the conference I understood that we are not alone. We have much to share with, and learn from, other groups with similar challenges, as well as from scientists and policy makers."

Some attendees thought more attention should be focused on American consumer habits, a point echoed by Rev. Peter Laarman, executive director of Progressive Christians Uniting. He urges a closer look at the hidden costs of imports. "Americans think of themselves as consumers rather than as citizens," he says. "We don't care, for example, if Chinese workers toil in factories with no safety regulations, or if residents in communities near our ports have to breathe dirtier air. What we care about is 'How much do I have to pay for an iPod?' and 'Where can I buy this doll for under ten dollars?'"

By their very nature, the ports and goods movement debates faced by community groups throughout North America can help to inform future discussions about consumerism and globalization. As far as health effects go, however, research findings and community experience are strongly suggesting that global trade, while an apparent boon to our economy, will continue to pose a serious threat to our population's environmental health unless protective and collective action is taken, and soon.

Figure

Children play soccer next to the TraPac terminal at the Port of Los Angeles, Wilmington, California.

(13)

Lancet. 2007 Feb 17;369(9561):571-7.

Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study.

Gauderman WJ, Vora H, McConnell R, Berhane K, Gilliland F, Thomas D, Lurmann F, Avol E, Kunzli N, Jerrett M, Peters J.
Department of Preventive Medicine, University of Southern California, 1540 Alcazar Street, Suite 220, Los Angeles, CA 90033, USA. jimg@usc.edu

Comment in:
• Lancet. 2007 Feb 17;369(9561):535-7.

Abstract

BACKGROUND: Whether local exposure to major roadways adversely affects lung-function growth during the period of rapid lung development that takes place between 10 and 18 years of age is unknown. This study investigated the association between residential exposure to traffic and 8-year lung-function growth.
METHODS: In this prospective study, 3677 children (mean age 10 years [SD 0.44]) participated from 12 southern California communities that represent a wide range in regional air quality. Children were followed up for 8 years, with yearly lung-function measurements recorded. For each child, we identified several indicators of residential exposure to traffic from large roads. Regression analysis was used to establish whether 8-year growth in lung function was associated with local traffic exposure, and whether local traffic effects were independent of regional air quality.
FINDINGS: Children who lived within 500 m of a freeway (motorway) had substantial deficits in 8-year growth of forced expiratory volume in 1 s (FEV(1), -81 mL, p=0.01 [95% CI -143 to -18]) and maximum midexpiratory flow rate (MMEF, -127 mL/s, p=0.03 [-243 to -11), compared with children who lived at least 1500 m from a freeway. Joint models showed that both local exposure to freeways and regional air

(13)

pollution had detrimental, and independent, effects on lung-function growth. Pronounced deficits in attained lung function at age 18 years were recorded for those living within 500 m of a freeway, with mean percent-predicted 97.0% for FEV1 ($p=0.013$, relative to >1500 m [95% CI 94.6-99.4]) and 93.4% for MMEF ($p=0.006$ [95% CI 89.1-97.7]).

INTERPRETATION: Local exposure to traffic on a freeway has adverse effects on children's lung development, which are independent of regional air quality, and which could result in important deficits in attained lung function in later life.

Life near the Fast Lane: An Increased Risk of Birth Problems

Ernie Hood 14

Citation: Hood E 2003. Life near the Fast Lane: An Increased Risk of Birth Problems. Environ Health Perspect 111:a111-a111. doi:10.1289/ehp.111-a111

Online: 01 February 2003

Several recent epidemiologic studies have suggested that exposure during pregnancy to ambient air pollution--including compounds released in motor vehicle exhaust--can increase the risk of preterm birth and low birth weight. Now, investigations are beginning to examine the question of whether pregnant women residing close to heavily traveled roadways have a greater occurrence of these adverse birth outcomes. In this month's issue, Michelle Wilhelm and Beate Ritz of the School of Public Health at the University of California, Los Angeles, report that such women do indeed face greater risk of adverse birth outcomes, especially if their third trimester falls during the autumn or winter months [***EHP* 111:207-216**].

Clogged arteries bad for babies. Make that *traffic* arteries--mothers living close to heavily traveled highways may be at greater risk for having preterm or low birth weight babies.

The epidemiologic case-control study involved nearly 51,000 infants born between 1994 and 1996 in 112 of the 269 zip code areas in Los Angeles County, California. These particular areas were selected because they are intersected by freeways and major arteries carrying more automobile traffic--and thus experiencing more traffic-related air pollution--than less-traveled roads. The cases included preterm infants and term low birth weight infants. The controls included term normal birth weight infants born in the same year and the same set of zip code areas.

The researchers mapped home locations for each of the cases and controls, and calculated a distance-weighted traffic density (DWTD) value for each subject as a measure of exposure to traffic-related air pollution. This measure accounts for residential proximity to roadways surrounding homes and the level of traffic on those roadways, and assumes that 96% of all motor vehicle exhaust pollutants disperse at 500 feet from the roadway. They also obtained ambient air pollution monitoring data compiled by the South Coast Air Quality Management District to assess the impact of background air pollution separately from that of traffic-related pollution. Using these covariants, Wilhelm and Ritz were able to calculate risk and odds ratios to assess the influence of roadway proximity on adverse birth outcomes.

They observed an approximately 10-20% increase in the risk of preterm birth (both normal and low birth weight infants) and the risk of term low birth weight in infants born to women living close to heavily traveled roadways. This was after controlling for measures of socioeconomic status and several other known risk factors for low birth weight and preterm birth, such as maternal age, race, and prenatal care.

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The researchers found higher risks for women whose third trimester fell during the autumn and winter months. Women whose third trimester fell during the fall/winter months and who were in the highest DWTD quintile had an estimated 39% greater risk of giving birth to a term low birth weight infant and a 24% greater risk of having a preterm low birth weight infant, compared to women in the lowest DWTD quintile. No effect was found for women with spring/summer third trimesters at any DWTD level.

The researchers say these findings correlate with more stagnant air conditions present in the winter months in the Los Angeles basin. Given the weather conditions at that time of year, it is expected that pollution levels will be higher, and thus it also would be expected that women in their third trimester living close to the roadways experienced increased risk, due to the increased exposure. The biological mechanisms whereby air pollution may cause adverse birth outcomes remain to be determined.

Air Pollution in Space and Time: Birth Outcomes Are Complicated by Exposure Variations

Bob Weinhold

Citation: Weinhold B 2005. Air Pollution in Space and Time: Birth Outcomes Are Complicated by Exposure Variations. Environ Health Perspect 113:A615-A616. doi:10.1289/ehp.113-a615

Online: 1 September 2005

1A

The association between air pollution and adverse effects on human birth outcomes is drawing increasing attention worldwide. In one of the latest developments, two epidemiologists at the University of California, Los Angeles, have found that the typical use of air pollution data from fixed monitoring stations may be inadequate for accurately pinpointing the links between air pollution and birth outcomes **[*EHP* 113:1212–1221]**. They also corroborate earlier findings that timing of pollution exposures is significant and that studying different pollutant combinations substantially complicates analysis.

Using new data in a follow-up on previous work, the researchers discovered that carbon monoxide (CO) and particulate matter (PM_{10}) had significant adverse effects—and at concentrations well below U.S. federal standards—on preterm and low-birth-weight (LBW) births for women living within one mile of an air pollution monitoring station. However, they measured substantially less or no effect for women living just two to four miles away. They also found the effects were most pronounced in association with exposure during early and late gestation, but less apparent for the full pregnancy.

The researchers used state and county databases documenting births to mothers living in the Los Angeles area from 1994 to 2000. To analyze LBW at full term, they studied a zip code cohort of 136,134 births, of which 2,778 were LBW. To analyze preterm births, they used 106,483 of the same births (minus births by cesarean section), of which 9,268 were preterm. Data from 18 government air pollution monitors documented CO, PM_{10}, nitrogen dioxide, and ozone levels. There were two years of data for fine particulate matter ($PM_{2.5}$), but the researchers found that wasn't a long enough period to provide significant findings (although many other studies have found that $PM_{2.5}$ is more of a health concern than PM_{10}).

The researchers discovered that for the first trimester, the highest quartile of CO concentrations observed —never more than two-thirds of the U.S. Environmental Protection Agency (EPA) 8-hour standard—was associated with a 27% increase in risk of preterm birth for women living within one mile of a pollution monitoring station. Similar CO exposures and distances during the third trimester were associated with a 36% increase in LBW following a full-term pregnancy. Parallel effects were seen for PM_{10}—which never exceeded two-thirds of the EPA 24-hour standard—early and late in pregnancy. This generally confirmed

findings from an earlier study using data from 1989 to 1993. No significant relationships were seen for nitrogen dioxide or ozone. 14

The researchers were able to account for many potentially confounding factors, including maternal age, level of prenatal care, and infant's sex. However, they had no data for other factors known to influence birth outcomes, such as maternal occupation, height, weight, weight gain during pregnancy, and smoking status. Folding in such data could affect the outcome of this study, the team acknowledges. The team's finding that effect estimates diminished for women living farther than one mile from a station suggests that the air monitoring stations may not provide accurate measures of exposure for these women; development of ways to better capture spatial variability in pollutant concentrations is therefore an important goal.

The researchers concluded that improved air pollutant data reflecting both geographic variation and the specific substances in the ambient air mixture will lead to much better understanding of air pollutants on birth effects. Also important are the use of finer breakdowns of the pregnancy period and more detailed background information on the parents and child.

Figures and Tables

Born of necessity.

A study of Los Angeles mothers shows that more detailed exposure information is critical for accurately drawing links between air pollution and adverse birth outcomes.

The NEW ENGLAND JOURNAL of MEDICINE

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ORIGINAL ARTICLE

Respiratory Effects of Exposure to Diesel Traffic in Persons with Asthma

James McCreanor, M.R.C.P., Paul Cullinan, M.D., Mark J. Nieuwenhuijsen, Ph.D., James Stewart-Evans, M.Sc., Eleni Malliarou, M.Sc., Lars Jarup, Ph.D., Robert Harrington, M.S., Magnus Svartengren, M.D., In-Kyu Han, M.P.H., Pamela Ohman-Strickland, Ph.D., Kian Fan Chung, M.D., and Junfeng Zhang, Ph.D.

N Engl J Med 2007; 357:2348-2358 | December 6, 2007

Abstract

Air pollution from road traffic is a serious health hazard, and people with preexisting respiratory disease may be at increased risk. We investigated the effects of short-term exposure to diesel traffic in people with asthma in an urban, roadside environment.

We recruited 60 adults with either mild or moderate asthma to participate in a randomized, crossover study. Each participant walked for 2 hours along a London street (Oxford Street) and, on a separate occasion, through a nearby park (Hyde Park). We performed detailed real-time exposure, physiological, and immunologic measurements.

Participants had significantly higher exposures to fine particles (<2.5 μm in aerodynamic diameter), ultrafine particles, elemental carbon, and nitrogen dioxide on Oxford Street than in Hyde Park. Walking for 2 hours on Oxford Street induced asymptomatic but consistent reductions in the forced expiratory volume in 1 second (FEV_1) (up to 6.1%) and forced vital capacity (FVC) (up to 5.4%) that were significantly larger than the reductions in FEV_1 and FVC after exposure in Hyde Park ($P=0.04$ and $P=0.01$, respectively, for the overall effect of exposure, and $P<0.005$ at some time points). The effects were greater in subjects with moderate asthma than in those with mild asthma. These changes were accompanied by increases in biomarkers of neutrophilic inflammation (sputum myeloperoxidase, 4.24 ng per milliliter after exposure in Hyde Park vs. 24.5 ng per milliliter after exposure on Oxford Street; $P=0.05$) and airway acidification (maximum decrease in pH, 0.04% after exposure in Hyde Park and 1.9% after exposure on Oxford Street; $P=0.003$). The changes were associated most consistently with exposures to ultrafine particles and elemental carbon.

Our observations serve as a demonstration and explanation of the epidemiologic evidence that associates the degree of traffic exposure with lung function in asthma.

Article

Air pollution from road traffic is a serious health hazard, and particulates from diesel exhaust have become cause for increasing concern. Epidemiologic studies have demonstrated associations between ambient particulate matter and respiratory-associated morbidity and mortality; these effects may be greater among persons with preexisting respiratory disease, including asthma.[1,2]

Diesel engines emit relatively low concentrations of carbon monoxide and carbon dioxide, but as compared with gasoline engines of similar size, diesel engines can generate more than 100 times the number of particles per distance traveled[3] and are major contributors to atmospheric particulate pollution. In urban environments, almost 90% of traffic-generated particulate

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

OFFICE OF THE
REGIONAL ADMINISTRATOR

August 22, 2000

The Honorable Adam B. Schiff
California State Senate
PO Box 942848
Sacramento, CA 94248-0001

Dear Senator Schiff:

Thank you for your letter concerning the proposed 710 freeway extension. You raise important questions about the project and statements being made about it. We will attempt to clarify the situation as you request.

As we understand it, there are claims that the 710 freeway extension would have positive air quality benefits and therefore is critical for demonstrating transportation conformity in the South Coast Air Basin. There are also claims that if the 710 extension is not built, transportation conformity could not be met thus resulting in the loss of federal transportation dollars. These claims are not true.

The main question is whether not building the 710 hurts Southern California Association of Governments' (SCAG) ability to demonstrate that the Region's Transportation Improvement Plan conforms with the South Coast Air Quality Plan (i.e. conformity). Our view is that it does not affect conformity. The conformity regulations require that the emissions analysis for a region include all the projects and policies being proposed (see, e.g. 40 CFR 93.122(a)). Only by analyzing the entire set of proposed projects and policies in the context of the overall transportation system can regional air quality impacts be determined. In SCAG's case, there are huge numbers of projects and a vast transportation system to consider. Therefore, a single project is very unlikely to help meet the emissions budgets in order to show conformity. Moreover, any claims of air quality benefits of the 710 project are questionable because the proponents have not adequately considered long term impacts.

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We hope that this information answers your questions. We have discussed this issue with the Federal Highway Administration. If you have any further questions or we can assist you in any other way, please contact Mark Brucker of my staff at (415)744-1231.

Yours,

Felicia Marcus

Felicia Marcus
Regional Administrator

cc: SCAG, Charles Keynejad
FHWA, Jean Mazur
Caltrans, Sharon Sherzinger

Air Pollution Linked to Progression of Atherosclerosis

By Meghan Lewit on February 12, 2010 2:39 PM

Study co-author Howard N. Hodis

Photo/Laura Costa

Keck School of Medicine of USC researchers, in collaboration with international partners in Spain and Switzerland and colleagues in California, have found that exposure to air pollution accelerates the thickening of artery walls that leads to cardiovascular disease.

The study, which will be published in the journal PloS ONE, is the first to link outdoor air quality and progression of atherosclerosis in humans.

Researchers found that artery wall thickening among people living within 100 meters of a Los Angeles highway progressed twice as quickly as those who lived farther away.

"The fact that we can detect progression of atherosclerosis in relation to ambient air pollution above and beyond other well-established risk factors indicates that environmental factors may play a larger role in the risk for cardiovascular disease than previously suspected," said study co-author Howard N. Hodis, director of the USC Atherosclerosis Research Unit and professor of medicine and preventive medicine at the Keck School.

Atherosclerosis — or stiffening and calcification of arteries — is a condition that leads to heart attacks, stroke and related deaths. Animal studies conducted in recent years have shown that inhalation of particulate matter from traffic and other sources accelerates atherosclerosis, but there previously has been very little study of these effects on humans.

"Until now, no study has ever investigated whether the slow but chronic process of the development of atherosclerosis would be affected by ambient air pollution," said study principal investigator Nino Kuenzil, vice director of the Swiss Tropical and Public Health Institute. Kuenzil began work on the study while a faculty member at the Keck School.

The findings were based on five randomized controlled trials — conducted by investigators at the Atherosclerosis Research Unit during the past decade — which involved linking the measured effects of outside air pollution to the progression of atherosclerosis in 1,483 participants in the Los Angeles area.

Colleagues at the University of California, Berkeley developed novel spatial models and air pollution measurements to estimate particulate matter all across Southern California and to estimate proximity from participants' homes to high exposure zones near highways and traffic corridors.

The investigators found that annual progression of artery wall thickness among those living within 100 meters of a highway was accelerated by 5.5 micrometers a year, more than twice the average progression of people who lived farther away.

The findings support emerging evidence that high-traffic corridors are unhealthy residential locations, researchers said.

With funding from the National Institutes of Health and the Obama administration, through the American Recovery and Reinvestment Act, the investigators have launched two large studies examining the risk of ambient air pollution in the early development of atherosclerosis in children and young adults where cardiovascular risk factor is low, Hodis said.

"Should studies in children and young adults support our current findings in adult populations concerning ambient air pollution and atherosclerosis risk, the public health implications and preventive strategies for further reducing cardiovascular disease will have global implications for both developed as well as developing industrial nations," he said.

The study was funded across six components of the National Institutes of Health.

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Contact

newsinfo@usc.edu

D-4 – Online Form Comments

Appendix A. Section 1. Scoping Comments Received via Email and Online

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From: Tom Williams [mailto:ctwiliams@yahoo.com]
Sent: Monday, February 28, 2011 2:52 PM
To: SR710Conversations
Subject: SR710 Meeting INFO REquest - NOP/NOI

As this is the date of circulation for the NOP/NOI for SR710 North, please provide a list of all participating/reviewing agencies and contacts receiving the Notice of Preparation and Notice if Intent.

Has the NOP been submitted to the CEQA Clearinghouse?

Dr. Clyde Williams

4117 Barrett Rd, LA 90032-1712

ctwiliams@yahoo.com

323-528-9682

From: Yanez, Alana [mailto:Alana.Yanez@sen.ca.gov]
Sent: Monday, February 28, 2011 11:01 AM
To: SR710Conversations
Subject: Mailing List

Hello,

Can you please place me on your mailing list.

Thank you,

Alana Yañez

Field Deputy

22nd Senate District

617 Olive Street #710

Los Angeles, CA 90014

Phone: (213) 612-9566

Fax: (213) 612-9591

From: Wade Winter [mailto:wadewinter@charter.net]
Sent: Monday, February 28, 2011 5:08 PM
To: SR710Conversations
Subject: Re: Date Correction, Thursday March 17th SR-710 Conversations

Why are there no meetings in La Canada Flintridge?

Why are there no meetings scheduled in La Canada Flintridge? You seem to have meetings schedule in every other city that will be impacted?

Wade Winter

From: Wade Winter [mailto:wadewinter@charter.net]
Sent: Monday, February 28, 2011 5:19 PM
To: SR710Conversations
Subject: Re: Series 2, SR-710 Conversations - Save the Date

Why are there no meetings scheduled in La Canada Flintridge? You seem to have meetings schedule in every other city that will be impacted?

From: xochilt carrillo [mailto:ms.csi7@gmail.com]
Sent: Monday, February 28, 2011 9:40 PM
To: SR710Conversations
Subject: Re: Date Correction, Thursday March 17th SR-710 Conversations

I had originally scheduled for Saturday March 5th, thats why I had asked if my appointment had been switched. But the 17th is fine. Can you send me the address as to where to go that day and what time? Thank you

On Mon, Feb 28, 2011 at 6:37 PM, SR710Conversations <SR710Conversations@metro.net> wrote:

Hello Xochilt,

Thank you for writing!

Could you please clarify your question? Do you mean to ask if the Thursday, March 17th meeting is still scheduled? My apologies, I was not sure what you meant by your question, "has my appointment been switched to March 17th?" Thanks in advance for clarification so I can be sure you receive the exact information you need...

-Danielle

From: xochilt carrillo [mailto:ms.csi7@gmail.com]
Sent: Monday, February 28, 2011 6:05 PM
To: SR710Conversations
Subject: Re: Date Correction, Thursday March 17th SR-710 Conversations

Im sorry but I cannot open any attachments. Has my appointment been switched to March 17th? If so, is it the same location?

From: xochilt carrillo [mailto:ms.csi7@gmail.com]
Sent: Monday, February 28, 2011 6:05 PM
To: SR710Conversations
Subject: Re: Date Correction, Thursday March 17th SR-710 Conversations

Im sorry but I cannot open any attachments. Has my appointment been switched to March 17th? If so, is it the same location?

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, March 01, 2011 10:21 AM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#18]

Name *	Jennie Campos
Email (you@email.com) *	camposj@metro.net
Select a Subject *	Comment for scoping record
Comment *	TEST

From: Wanda Ostermann [mailto:wanda.ostermann@gmail.com]
Sent: Wednesday, March 02, 2011 9:13 AM
To: SR710Conversations
Subject: outreach

Hello,

I attended last night's Series 2 meeting at Lake Avenue Church in Pasdena. Because it broke from the format originally planned, I thought it ended up being a very productive session and came away with many questions answered and a better understanding of the CEQA/NEPA process.

In response to your request for additional contacts in an effort to attract more input from the public, I submit the following organizations which could concievably put out notices to their members/followers to urge them to attend any/all of the upcoming SR-710 Conversations meetings.

Thank you,

Wanda Ostermann

Pasadena Bungalow Heaven Neighborhood Association

http://www.bungalowheaven.org/

Garfield Heights Neighborhood Association

http://garfieldheights.org/

Historic Highlands Neighborhood Association

http://www.historichighlands.org/

South Lake Business Association

http://www.southlakeavenue.org/about-south-lake-business-asssociation/

Orange Heights Neighborhood Association

http://www.orangeheights.org/

Pasadena Playhouse District

http://www.playhousedistrict.org/

Linda Vista/Annandale Association

http://www.lvaa.net/

Madison Heights Neighborhood Association

http://www.mhnapasadena.org/

Old Pasadena

http://www.oldpasadena.org/index.asp

Chapman Woods Association

http://www.chapmanwoods.net/

All Saints Church (a very active congregation within the Pasadena community).

http://www.allsaints-pas.org/about/

The Pasadena Star News

http://www.pasadenastarnews.com/

The Pasadena Weekly

http://www.pasadenaweekly.com/cms/index/

California State University Los Angeles Public Affairs, Los Angeles

http://www.calstatela.edu/univ/ppa/publicat/

Caltech, Pasadena

http://www.caltech.edu/

Art Center, Pasadena

http://www.artcenter.edu/accd/index.jsp

Le Cordon Bleu-Los Angeles & Pasadena Campuses

http://www.chefs.edu/Los-Angeles

Westridge School for Girls, Pasadena

www.westridge.org

Sequoyah School, Pasadena

http://www.sequoyahschool.org/

Pasadena Heritage

http://www.pasadenaheritage.org/

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, March 02, 2011 3:45 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#19]

Name *	Clyde Williams
Email (you@email.com) *	ctwiliams@yahoo.com
Phone Number	(323) 528-9682
Address	4115 Barrett Road Los Angeles, CA 90032-1712 United States
Select a Subject *	Add me to the mailing list
Comment *	I have not been added to the mailing list as I have not received anytthing Also I requested by phone access to the NOP/NOI issued on Monday but to date have not received ANY message regarding the NOP/NOI

Please extend the Scoping Period and add at least 4 meeting locations in NELA and LaCanadaFlintridge areas

---

From: Wanda Ostermann [mailto:wanda.ostermann@gmail.com]
Sent: Thursday, March 03, 2011 2:22 PM
To: SR710Conversations
Subject: Re: outreach

Will you please let me know where I can find a copy of the Notice of Intent which was announced at the Series 2 meeting on March 1 as having been filed on February 28?

Thank you,

Wanda Ostermann

wanda.ostermann@gmail.com\

From: Rody Stephenson [mailto:rodys@earthlink.net]
Sent: Friday, March 04, 2011 3:30 PM
To: SR710Conversations
Subject: RE: SR-710: NOTICE OF SCOPING/INITIATION OF STUDIES
This email cannot be printed nor can it be cut and pasted into a word document.

Please fix and resend.

Rody

From: Wade Winter [mailto:wadewinter@charter.net]
Sent: Friday, March 04, 2011 6:07 PM
To: SR710Conversations
Subject: Re: SR-710: NOTICE OF SCOPING/INITIATION OF STUDIES

Why is there no scoping meeting scheduled in La Canada Flintridge?

On Mar 4, 2011, at 11:02 AM, Metro wrote:

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF TRANSPORTATION
DISTRICT 7, Division of Environmental Planning
100 South Main Street, MS 16A
LOS ANGELES, CA 90012
PHONE (213) 897-0703
FAX (213) 897-0685

March 1, 2011

Individuals Interested in the 710 Gap Closure Project

File: 07-LA-710
PM 26.7/32.1
EA/Proj. ID:
187900/0700000191
710 Gap Closure

Subject: NOTICE OF SCOPING/INITIATION OF STUDIES

This is to advise you that the California Department of Transportation (Caltrans), District 7, the Los Angeles County Metropolitan Transportation Authority (Metro), is formally initiatin studies for the 710 Gap Closure Project. The proposed project, depending on the results of a thorough environmental analysis of all possible transportation improvements, may include, b be limited to: surface and subsurface highway/freeway construction, heavy rail and bus/light systems, local street upgrades, traffic management systems and a no build alternative. There currently is a gap in the I-710 corridor, for a distance of approximately 4.5 miles (7.2km), wl extends between Valley Boulevard to the south and Del Mar Boulevard to the north. As orig identified in the April 13, 1998 Record of Decision for the Meridian Variation alignment, thi contributes to congestion on local streets and the regional freeway system. The objective of t project is to relieve congestion and improve mobility within the study area.

Preliminary environmental resource studies indicate that an Environmental Impact Report / Environmental Impact Statement (EIR/EIS) is the appropriate environmental document. Calt will prepare an EIR/EIS to evaluate the anticipated environmental effects and recommend measures to mitigate those effects pursuant to the California Environmental Quality Act (CE and the National Environmental Policy Act (NEPA).

During the course of the study Caltrans will work closely with the public to assure that all pe factors and viable alternatives are considered. We welcome any comments or suggestions y may have concerning possible alternatives or potential social, economic, and environmental impacts as they pertain to the proposed project.

Please send your written comments by April 14, 2011 to:

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

Public Scoping Meetings will be held at the following locations:

- San Gabriel, March 15, 2011, 6pm to 8pm Jefferson Middle School, 1372 East Las Tunas Drive, CA 91776
- Alhambra, March 16, 2011, 6pm to 8pm Civic Center Library, 101 S. First Street, CA 91801
- Glendale, March 22, 2011, 6pm to 8pm Glendale Community College, 1500 North Verdugo Road, California 91208
- South Pasadena, March 23, 2011, 6pm to 8pm South Pasadena High School, 1401 Fremont Ave., 91030
- El Sereno, March 29, 2011, 6pm to 8pm LA Christian Presbyterian Church, 2241 N. Eastern Ave., 90032
- Pasadena, March 30, 2011, 6pm to 8pm Lake Avenue Church, 393 N. Lake Ave., 91101

An online Virtual Scoping Meeting will be held on March 21, 201. (It will begin live at 6pm and continue on demand through April 14, 2011). Register to participate at: metro.net/sr710conversations and click the "Participate from Home" tab.

All comments received will become part of the project record and will provide valuable input to our environmental and design personnel. If you have any questions, contact Garrett Damrath at (213) 897-9016. Thank you for your interest in this important transportation study.

Sincerely,

Ron Kosinski
Deputy District Director
Division of Environmental Planning

"Caltrans improves mobility across California"

Sent to wadewinter@charter.net: unsubscribe | update profile | forward to a friend

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Monday, March 07, 2011 8:13 AM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#20]

Name *	John Bednarski
Email (you@email.com) *	bednarskiboys@sbcglobal.net
Address	1200 Sonoma Drive Altadena, CA 91001 United States
Select a Subject *	Add me to the mailing list

Comment *

I fully support the completion of the 710 freeway gap. I have been commuting to Downtown los angeles for nearly 30 years from Altadena, and i believe that the completion of this portion of the 710 freeway is vital to the interests of the region. furthermore, my wife commutes to Carson each day, and her commuting time could be cut greatly if she did not have to get on/off the freeway multiple times to make this commute through Pasadena, South Pasadena, and Alhambra. completion of this freeway gap would also make the cities of Pasadena, South Pasadena, and Alhambra safer as surface traffic would be greatly reduced.

From: Lisa Montano [mailto:lisa@jasonzahn.com]
Sent: Saturday, March 05, 2011 9:34 AM
To: SR710Conversations
Subject: I'd like more information about Sr-710 Conversations
Where is the online comment form to get your comments on record?
Thank you,
Lisa Montano

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Monday, March 07, 2011 8:13 AM

To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#20]

Mon 3/7/2011 8:13 AM

Name *	John Bednarski
Email (you@email.com) *	bednarskiboys@sbcglobal.net
Address	1200 Sonoma Drive Altadena, CA 91001 United States
Select a Subject *	Add me to the mailing list

Comment *

I fully support the completion of the 710 freeway gap. I have been commuting to Downtown los angeles for nearly 30 years from Altadena, and i believe that the completion of this portion of the 710 freeway is vital to the interests of the region. furthermore, my wife commutes to Carson each day, and her commuting time could be cut greatly if she did not have to get on/off the freeway multiple times to make this commute through Pasadena, South Pasadena, and Alhambra. completion of this freeway gap would also make the cities of Pasadena, South Pasadena, and Alhambra safer as surface traffic would be greatly reduced.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, March 08, 2011 11:39 AM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#21]

Name *	Karen Navarrete
Email (you@email.com) *	karen_navarrete@ca9.uscourts.gov
Phone Number	(626) 576-8391
Address	1337 S. Primrose Ave. Alhambra, CA 91803 United States
Select a Subject *	Comment for scoping record

Comment *

My husband and I have lived 2 blocks away from the corner of Valley Blvd. and Fremont Avenue for 26 years. Because the 710 Freeway connection has not and will not be completed, the traffic has increased dramatically over the years. All the traffic that should have been on the 710 connection has been dumped onto Valley Blvd. and Fremont Ave. Either we sit in the traffic, or drive out of our way to avoid that intersection. Either way, we are impacted economically --wasting our gas, and wasting our time. All that adds up over the days, months & years. The corner of Valley Blvd. and Fremont Ave. has become a nightmare. We ask that something be done to help relieve the congestion and polution in our neighborhood. Our window sills now collect even more soot and dust. Is there not another street or access that can be used to divert some of the traffic that currently flows onto Valley Blvd. & Fremont? We believe that the quality of life of A lhambrans are just as important as those who live in South Pasadena, and we ask for a solution. Thank you.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, March 09, 2011 12:07 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#22]

Name *

Clyde Williams

Email (you@email.com) *

ctwiliams@yahoo.com

Phone Number

(323) 528-9682

Address

4115 Barrett Road

Los Angeles, CA 90032

United States

Select a Subject *

Comment for scoping record

Comment *

As of 9 March no relevant office within the City of Los Angeles government has received the Notice of Preparation - Please Send - ken.husting@lacity.org

Addressees for outreach in ElSereno

joseaguilarcd14@hotmail.com, RJNSON08@sbcglobal.net, victorjune@yahoo.com, falconn_la@yahoo.com, johnnycarbajal@hotmail.com, thegoodshepherd62@gmail.com, reckoner73@gmail.com, outwardscottla32@yahoo.com, franklarez@sbcglobal.net, AMERIKAIMAGEINC@yahoo.com, rosehillsreview@yahoo.com, val@valsdesignstudio.com, LindaM@organizedsportswear.com, lindamcguire2003@aol.com, moverstreet@sbcglobal.net, hugoleopacheco@yahoo.com, ctwiliams@yahoo.com, eddie.chow@sbcglobal.net, eddieschow@gmail.com, "Carlos Morales" , "Liu, Grayce"

CTW

From: Carol Teutsch [mailto:cbteutsch@comcast.net]
Sent: Thursday, March 10, 2011 10:01 AM
To: SR710Conversations
Cc: 'Carol Teutsch'
Subject: Two questions I need answered

Dear 710 Conversations organizers,

I wanted to know if you recorded the South Pasadena meeting last nite 3.9.2011 and if so where can I listen to it?
Also I would like to have a copy of the slides that were presented—the packet handed out did not include the presenters' summary from the last conversation at South Pasadena.
Thank you.

Carol Teutsch
841 Moon Ave
Los Angeles, CA 90065
323 352-8079

From: Knapp [mailto:hcknapp@earthlink.net]
Sent: Thursday, March 10, 2011 3:13 PM
To: Valentino, Danielle; ron.kosinski@dot.ca.go; Smith, Michelle
Cc: Failing, Doug; mary@mbimedia.com; SR710Conversations
Subject: South Pas meeting 9 Mar

Dear Sirs/Madams:

I have questions and requests regarding last nights "SR-710 Conversations Series 2" meeting in South Pasadena 3/9/11.

1) Why did we not get the handout of the slide presentation that you gave last night? We would like you to provide access to the printable version of the slide presentation presented in South Pasadena 3/9/11.
At every other venue Metro did handout a printed version of this slide show
- it included a record of the comments (voicing of concerns) made during Series 1 that were unique to the groups that gathered in the individual cities.

2) Why was a video of the meeting held in South Pasadena last night NOT made available online to view like the meetings held in Glendale and Alhambra?
The Metro meeting in South Pasadena had far more technical questions asked regarding CEQA and NEPA than in the meetings from Glendale and Alhambra so we wanted a record of this.
The South Pasadena City Clerks office states that METRO denied a request by the city of South Pasadena to record this meeting. If Metro was not making the video of South Pasadena's meeting available on line like the other 2 meetings, why then did Metro deny the City of South Pasadena the right to record the meeting?

3) Whose office at Metro handles the environmental report? May we have the contact name and email address of that individual?
I understand that Garrett Damrath is the Senior Environmental Planner at Caltrans. May we please also have his contact email?

I find that there is a huge inconsistency of how the cities are being treated.

My requests are that you make available to me and others not only the handout, and the contact info I have requested , but also the recording of the South Pasadena 3/9/11 meeting.

Sincerely,

Harry A. Knapp
South Pasadena
(626) 441-6147

From: Paul Habib [mailto:paul.habib@lacity.org]
Sent: Monday, March 14, 2011 2:31 PM
To: SR710Conversations
Subject: Re: SR-710 Conversations. Join us for Scoping

I will attend the March 29 meeting in El Sereno. Thanks.

Paul Habib
Public Projects and Transportation Director
Office of Councilmember Jose Huizar
Los Angeles City Council, District 14

200 N Spring St Room 465
Los Angeles, CA 90012
(213) 473-7014
(213) 847-0680 fax

From: Stedman Ng [mailto:stedman@gmail.com]
Sent: Monday, March 14, 2011 2:45 PM
To: SR710Conversations
Subject: Re: SR-710 Conversations. Join us for Scoping

Hello -

I'm not sure if I was suppose to receive this. Please confirm this was sent in error. Thank you.

--
Stedman Ng, CPA, LEED AP, MLO
Monterey Park Environmental Commission Co-Chair

On Mon, Mar 14, 2011 at 2:25 PM, Metro <sr710conversations@metro.net> wrote:
Error! Filename not specified.

Error! Filename not specified.

Error! Filename not specified.

Sent to stedman@gmail.com: unsubscribe | update profile | forward t

Error! Filename not specified.

om/#!/greenmpk

From: Hugo Garcia [mailto:hugogarcia1@sbcglobal.net]
Sent: Monday, March 14, 2011 9:00 PM
To: SR710Conversations
Subject: Re: SR-710 Conversations. Join us for Scoping

Isn't there a CEQA/NEPA meeting in El Sereno on 3/17/11? Why is that information inaccessible?

Hugo Garcia
El Sereno

Metro

SR-710 Conversations – A Series of Information Meetings

Received 3/14/11 per MES

Tuesday, March 8, 2011

NAME: SHERRY STUBBS

ADDRESS: 3700 PALLESTA ST, #11 CITY: LA CRESCENTA ZIP: 91214

REPRESENTING: CVCA

Please drop comments in the Comment Box or:
Mail to: Michelle Smith
One Gateway Plaza
Mail Stop: 99-22-9
Los Angeles, CA 90012

Comments related to topics covered in Series 1 and Series 2 meetings (please print):

Notice of all of these meetings is severely lacking - no newspaper publication or ad. Instead, 18 meetings are being jammed thru in 2 months' time + time is out of the dinner hour. Cannot have adequate public participation under these circumstances.

Note: Comments specifically for scoping will be accepted into the official administrative record beginning February 28, 2011 concurrent with publication of the Notice of Intent /Notice of Preparation. Scoping comment closing date will be April 14, 2011. Comments received prior to February 28, 2011 will not be included in the official administrative record.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, March 15, 2011 7:34 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#23]

Name *

Sean Telles

Email (you@email.com) *

swt2104@columbia.edu

Phone Number

(626) 679-4645

Address

5618 N. Muscatel Ave

San Gabriel, Ca 91776

United States

Select a Subject *

Comment for scoping record

Comment *

In additions to the comments I made tonight. i.e. we should focus on trains not freeways, the problem of LA is East/West not North/South.

1) By starting a meeting in the San Gabriel Valley at 6pm, you are showing us you don't understand our transportation needs. Those who drive to work, will not make it home by 6. Those who take public transportation get home even later.

2) Before you spend so much time and effort working on the 710, please fix your website. In my experience it doesn't always show you the fastest or most convenient routes for taking public transportation. Look at how Google gives public transportation directions for a better and more flexible way of giving directions. Look at general directions and also how google uses GPS in smart phones. If you fix that and make taking public transportation more convenient, there will be less traffic. OR just refer your customers directly to Google.

3) Thank you for your events. They are needed. But you also need to advertise more visibly and locally:

Store fronts signs and Spanish and Chinese newspapers are heavy read here.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, March 17, 2011 9:14 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#24]

Name *	Tim Peters
Email (you@email.com) * dohmgr@pacbell.net	
Select a Subject *	Comment for scoping record
Comment *	I am in favor of the follwing priorities in this order: 1. Extension of the Gold Line going East 2. Continuation of the 110 linking to the 210 3. Extension of the 710 linking the 10 and 210 The cost of these would be great but the cost is only going up and now is the time as it will create jobs and will help with long term solutions to a overcrowding of freeways and the side effects of smog/polution it causes. Thank you.

From: tsai yi chan-beal [mailto:tsaiyi.chanbeal@gmail.com]
Sent: Friday, March 18, 2011 6:10 PM
To: SR710Conversations
Subject: Virtual meeting on Monday March 21 - I'd like to testify, can I put my name in?
Hi there,

Is it possible for me to go first? I have a class at 6:30pm that evening. Please let me know. Thanks so much!

Tsai Yi

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Friday, March 18, 2011 5:10 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#25]

Name *	Scott Van Dellen
Email (you@email.com) *	svandell2@gmail.com
Phone Number	(818) 207-8812
Address	4453 Oakwood Avenue La Canada, CA 91011 United States
Select a Subject *	Comment for scoping record

Comment *

I am OPPOSED to the extension of the 710 to connect to the 210. Truck traffic through Los Angeles must be mitigated and diverted FIRST before we fully open port traffic through La Canada. Once the 710 is linked to the 210, port truck traffic will PRIMARILY run along this route during all times of the

day, increasing substantially noise (trucks must downshift going through La Canada, increasing their noise substantially), congestion (its almost impossible to get off the exits of La Canada because of the line of trucks in the right lane), and air pollution (trucks are dirtier than cars). It's about time we committed fully to mass transit and a better environment for all residents, not worse. We need alternative truck terminals and methods to convey Port goods to the Western United States and not just unfairly burden just the the Interstate 5 and Interstate 710/210 neighborhoods.

From: Tom Williams [mailto:ctwiliams@yahoo.com]
Sent: Monday, March 21, 2011 7:01 PM
To: SR-710 Conversations Online Open House
Cc: SR710Conversations
Subject: Re: SR-710 Conversations Online Open House Is Now Open A FARCE - TOTAL WASTE

I have tried to use your on line system tonight - totally wasted 30 minutes to get to this point

Add more real scoping meetings
and
Extend deadline to April 30

OBTW
The Purposes and Needs differ between what was given in the Agency Scoping meeting and the Public Scoping Meetings.

As the Purposes and Needs provided for agencies and for this effort include financials and fundings, also PPP please provide full economic and financial analyses for all alternatives in order to assure alternatives are compliant with Purposes and Needs for the Project.

Also provide milestones for Scoping Report completion and submission to MTA, RFP for environmental and conceptual engineering for "all possible alternatives", and for alternatives assessments and recommendations.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Monday, March 21, 2011 6:48 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#28]

Name *	Chelsea Dickerson
Email (you@email.com) *	chelsdickerson@gmail.com

Phone Number	(213) 438-1755
Address	547 Eaton Drive Pasadena, CA 91107 United States
Select a Subject *	Comment for scoping record
Comment *	I think closing the 710 gap is a great idea, as I travel to Orange County quite a bit and would like another option for my commute. I would like the environmental documents to fully study traffic impacts on the 210 East, especially related to truck traffic. I would love to see a comparison of traffic levels if the 710 gap is built and if it is not. Please also study traffic impacts to the 605 and the downtown area. I would like like to see air quality studied, especially at Metro Gold Line stations along the 210 freeway.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Monday, March 21, 2011 6:40 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#26]

Name *	Lilian Gutierrez
Email (you@email.com) *	liliandg@msn.com
Phone Number	(626) 576-4889
Address	1515 Pedley Drive

	Alhambra, CA 91803 United States
Select a Subject *	Comment for scoping record
Comment *	I live in Alhambra and welcome the 710 being extended to the 210 freeway. For many years, our city has been congested to its limit because the I-710 ends in Alhambra pushing all vehicular traffic going north onto our city streets. Not only should the 710 be extended, but in cities like Alhambra, Monterey Park and the community of El Sereno traffic congestion impacts and mitigation measures should be looked at. The intersections of Fremont/Valley and Atlantic/Valley need to be studied as I can honestly say they are currently at LOS "F".

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Monday, March 21, 2011 7:54 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#29]

Name *	Samuel Zneimer
Email (you@email.com) *	samsterz78@hotmail.com
Address	1449 Indiana Ave South Pasadena, CA 91030 United States
Select a Subject	Comment for scoping record

*

Comment *

I believe that a multi-modal approach will prove to be the best result. Out of the possible options, of freeways, tunnels and tollways, I believe you will find that a multi mode solution will have the least pollution and health impacts. I worry with other options especially the freeway and tunnel that traffic relief projections are overestimated and are inflated to fit into a preconceived solution. It's hard to image that Metro and Caltrans have spent millions on studies only to truly consider a no build alternative. I know from reading studies that vehicle miles traveled will actually increase versus the no build solution, unless there is a full build out of the Regional Transportation Plan (much of which is unfunded). I believe the goal for Metro/Caltrans should be to reduce dependency on one mode of travel, I'm not foolish enough to believe that people will stop driving but if there are options to take fixed rail, more people will take it. Especially if gas prices continue to increase, I believe the investment in public transportation now while may not have the immediate of a freeway, he long term effects will be better. Because no matter how many freeways/tollway we build the population is growing so fast that we cannot possibly expanded the highway system to keep up, making alternative modes far more attractive.

Also when laying down fixed rail it gives business' the incentive to build near rail thus density will increase close to rail making it still more viable. Also with gas prices increasing heavy fixed rail will become more viable, so the investment in the ACE project will fully realized because it will make economic sense.

In the end I want all alternatives to be evaluated fairly, factoring in health, long term traffic relief (not for cars but for moving people), and all environmental factors. Move the direction of transportation to the future, envision transportation as part of a whole not just one aspect in planning, consider land use and the want to make areas more walkable, bike accessible and overall more integrated.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Monday, March 21, 2011 6:41 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#27]

Name *	Lilian Gutierrez
Email (you@email.com) *	liliandg@msn.com
Phone Number	(626) 576-4889
Address	1515 Pedley Drive Alhambra, CA 91803 United States
Select a Subject *	Comment for scoping record
Comment *	I live in Alhambra and welcome the 710 being extended to the 210 freeway. For many years, our city has been congested to its limit because the I-710 ends in Alhambra pushing all vehicular traffic going north onto our city streets. Not only should the 710 be extended, but in cities like Alhambra, Monterey Park and the community of El Sereno traffic congestion impacts and mitigation measures should be looked at. The intersections of Fremont/Valley and Atlantic/Valley need to be studied as I can honestly say they are currently at LOS "F".

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, March 22, 2011 12:46 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#30]

Name *	David Anderson

Email (you@email.com) *	djandersonkiev@gmail.com
Phone Number	(626) 300-8665
Address	930 N Monterey St Apt 320 Alhambra, CA 91801 United States
Select a Subject *	Add me to the mailing list
Comment *	This project has been stalled by various methods for almost 50 years. I hope this scoping is not another device to prevent the completion. The environmental impact on Alhambra has been horrendous because of the stalling tactics by a small minority in South Pasadena. A sense of urgency is necessary - the time for the stall is over.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, March 22, 2011 10:25 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#32]

Name *

Judith O'Keefe

Email (you@email.com) *

judyo403@msn.com

Phone Number

(626) 799-4349

Address

403 Winthrop Road

San Marino, CA 91108

United States

Select a Subject *

Add me to the mailing list

Comment *

This project is long overdue. Our district 7 has become inundated with transient traffic due the obstructionist efforts of the city of South Pasadena to halt the completion of the 710 freeway. In fact, their own residents have suffered along with the rest of us who live in this district. Please, please proceed with this project. Many thanks for keeping this issue alive! Judith O'Keefe

---

From: Petersen, Gary [mailto:Gary.Petersen@parsons.com]
Sent: Tuesday, March 22, 2011 12:21 PM
To: SR710Conversations
Subject: I'd like more information about Sr-710 Conversations

How and when will the comments received last night be retrievable?

Gary L. Petersen

Sr. Project Manager

PARSONS

100 W. Walnut Street

Pasadena, CA 91124

(626) 440-6244

Fax: (626) 440-6155

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, March 22, 2011 6:35 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#31]

Name *

Andrea Nathanson

Email (you@email.com) *

andico7@earthlink.net

Phone Number

(818) 951-8454

Address

2849 Harmony Place

la Crescenta, CA 91214

United States

Select a Subject *

Comment for scoping record

Comment *

We residents of the Crescenta Valley believe this is one gigantic snow job. You have made it clear that you believe you are moving ahread with this project. You will destroy the Crescenta Valley and the residents health within it.

We will do everything in our power to bring to light the ridiculous exoense to human health = property health -- there are 7 schools in this area - what do you plan to do about the trucks that will come into our area and pollute it?

What do you plan to do about destroying our property values

what are you planning to do with these diesel trucks ... why are you not requiring their conversion into electric trucks?

We are contacting major documentary film makers at this time - who will be covering all this soon enough.

The truth will be coming to light.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, March 23, 2011 9:16 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#33]

Name *

Jon Thompson

Email (you@email.com) *

calfiles@sbcglobal.net

Select a Subject *

Comment for scoping record

Comment *

Build the extension!

I am a resident of Glendale who is very much in favor of an extension to the 710 freeway that will connect to the 210 Freeway. Those Glendale, La Canada, La Crescenta and Pasadena locals who are not in favor are the very same people who complain about traffic. Yet they must never have driven north on the 710, been shunted onto the 10 to the 5 downtown and so on. They are merely an example of the not-in-my-back-yard syndrome. Traffic elsewhere? They don't care, as they're not affected.

I say that for the greater good, this project should be completed.

Jon Thompson

From: Gloria A Castillo [mailto:gcastillo@egpnews.com]
Sent: Thursday, March 24, 2011 4:22 PM
To: SR710Conversations
Subject: Media request
Importance: High

Hi,
When is the 710 gap meeting in Highland Park??

--

Gloria Angelina Castillo
Bilingual Staff Writer/ Assistant Editor
Eastern Group Publications
111 S. Avenue 59
Los Angeles, CA 90042
Phone: (323) 341-7970
Fax: (323) 341-7976
http://www.egpnews.com

Eastside Sun / Northeast Sun / Mexican American Sun / Bell Gardens Sun / City Terrace Comet / Commerce Comet / Montebello Comet / Monterey Park Comet / ELA Brookyln Belvedere Comet / Wyvernwood Chronicle / Vernon Sun

Michelle Smith
cc: L. Byrkel
3/28/11

CITY OF SOUTH PASADENA
OFFICE OF THE CITY COUNCIL
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7230 FAX: 626.403.7211

Received
MAR 25 2011
Highway Programs

March 17, 2011

Mr. Doug Failing
Executive Director, Highway Programs
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Dear Mr. Failing:

The 1998 Record of Decision (ROD) included interim improvements projects and the creation of Design Advisory Groups (DAG) in the four corridor cities. Caltrans provided $10 million, but requested projects from four DAGs totaled about $55 million. Congressman James Rogan was able to obtain federal funding which was allocated under H.R. 5394, through P.L. 106-346. Furthermore, Condition 11 of the Record of Decision requires a before and after study on the effectiveness of the projects' interim improvement measures.

The City of South Pasadena has one more remaining project, the Fair Oaks SR-110 Interchange project (RABA01 5071(013)), with about $10.5 million available from the Rogan and Metro funds. This is the most important project as it will greatly improve the flow of traffic exiting from the SR-110 northbound onto Fair Oaks Ave., and reduce back-up queuing on the freeway. It will make entering the SR-110 southbound much safer and faster, and will reduce congestion for both northbound and southbound traffic on Fair Oaks Ave. This intersection has an average daily traffic count of 38,000.

This project has important regional traffic flow implications, especially since most of the southbound traffic on Fair Oaks Ave. heading for the SR-110 is coming from Pasadena and other cities north and east of South Pasadena. The consequence of not reconfiguring this intersection means greater traffic congestion and the likely loss of valuable federal transportation dollars to the San Gabriel Valley.

This important project has a funding shortfall of approximately $6 million ($1 million design and approximately $5 million construction) because of increased construction costs, land acquisition, environmental remediation, and design changes required by Caltrans.

Measure R contains funding for the SR-710 "gap closure." This Fair Oaks SR-710 Interchange Project is in the ROD corridor and is part of a multimodal solution to local and regional congestion. Since the Measure R project is still undefined as to purposes and needs, this project fits well into the voters intentions. Therefore, South Pasadena strongly urges you to use Measure R funds to allow completion of this project and reduce congestion.

Should you need additional information please contact John Davidson, City Manager, or Michael Cacciotti, Mayor Pro Tem.

Yours truly,

Mike Ten
Mayor

Michael A. Cacciotti
Mayor Pro Tem

Philip C. Putnam
Councilmember

Richard D. Schneider, MD
Councilmember

David Sifuentes
Councilmember

From: Alexander the Great [mailto:alek3000@sbcglobal.net]
Sent: Friday, March 25, 2011 10:40 AM
To: SR710Conversations
Subject: RE: 710 fwy expansion project
Dear Metro,
I am entirely against the 710 fwy project,
and support the views of most residents (who oppose the project as well).
I would strongly advise
to save this investment
and - instead of spending on the wasteful 710 project - please redirect it to improve bus service in Los Angeles; this has much more need than the 710 road tunnel.
Thank you for your consideration.
I strongly believe Metro will use common sense and spend the money where it's mostly needed - i.e. on improving the bus service (which has been drastically reduced) instead of wasting on automobile tunnel projects.
Yours truly,

Alexander Friedman
Los Angeles, California
(323) 465-8511

From: porona1060@aol.com [mailto:porona1060@aol.com]
Sent: Sunday, March 27, 2011 12:23 PM
To: SR710Conversations
Cc: Mayor.Villaraigosa@lacity.org; Mayor@lacity.org; citycouncil@montereypark.ca.gov; Councilmember.Alarcon@lacity.org; Complete710@aol.com; council@smgov.net; ctwiliams@yahoo.com; councilmember.reyes@council.lacity.org; councilmember.parks@council.lacity.org; chpr@ucla.edu; bdea@laweekly.com; bwatt@kpcc.org; eyanez@audubon.org; fpasker@yahoo.com; Ing.Jones@lacity.org; leafy1018@hotmail.com; Monica.Aleman@asm.ca.gov; Molina@bos.co.la.ca.us; publiceditor@sacbee.com; Reyneiro@yahoo.com; voicepub@gmail.com; JoanneNO710@aol.com; yaroslavsky@bos.lacounty.gov; danfarkas@charter.net; senator.boxer@sen.us.gov; senator.feinstein@sen.us.gov; Councilmember.Huizar@lacity.org; mary@mbimedia.com
Subject: SR-710 Conversations/OFFICIAL SCOPING/EIR QUESTIONS/COMMENTS/CONCERNS

Peter A. Orona
5472 Allan St.
Los Angeles, CA 90031
March 27, 2011

SR 710 Conversations/OFFICIAL SCOPING/EIR

QUESTIONS/COMMENTS/CONCERNS
ONE GATEWAY PLAZA
LOS ANGELES, CA 90012

The proposed 710 Tunnel raises serious moral questions about public/private transportation issues. We did not choose to live near a freeway, connector road, or tunnel. Currently, productive residents living within the Meridian Corridor do so without any complex technologies adding to our health risks. For children, it brings an increased risk of asthma, according to researchers at the Keck School of Medicine of the University of Southern California. "It's one of a host of breathing problems that can plague teens living and learning near L.A.'s vast network of freeways – and these problems can follow them throughout life. With traffic cris-crossing into every corner of SoCal, few families in any part of town are immune to the risk (LA Parent March 15, 2011 Issue)
http://www.reportingonhealth.org/fellowships/projects/air-teenage-lungs-1 ."
Freeway pollution and noise increase the risk of developing asthma, cancer, hearing loss, and stress related diseases. Those of us who live in this neighborhood can only look forward to a future filled with illness.
Today there is no 710 Surface Freeway Route, Valley Blvd.-Alhambra Connector Road, or 710 Tunnel; consequently, the risk emanating from such concepts are zero. To all Federal, State, County, and Local governments who profess accountability when maintaining modern commercial productivity, it is your duty to find a balance between an individual's right to exist, and urbanization. Anything short of this is a travesty to the democratic process, and an abatement of our humanity. As elected officials, it is your responsibility in making sure that our communities are not abused. Our communities are holding you accountable. As honorable civil servants of our communities, we respectfully request the following items be addressed rigorously, competently, and judiciously.
1. What would it take to construct the southern portal between the 60 Frwy (Pomona), and the 10 Frwy (San Bernardino)? Can Freeway Interchanges be reconfigured? If yes, then would it be possible for the southern portal to begin just before the 10 Frwy. Can a tunnel be constructed to go underneath the San Bernardino Frwy?

2. In regards to Electrostatic precipitators (ESP), or Electrostatic air cleaners: What data is there on the effectiveness of ESP/Scrubbers on ambient outside air? Are there a list of contaminants that scrubbers will remove and a list that the

scrubbers will not remove? Which companies will be contracted to build the ESP's? Japan uses removal technologies in high-density areas, what is going to be done in El Sereno? What kind of containment tunnel management will be used; "dispersion containment", or removal containment"? How many tons of waste will a "scrubber tower" hold prior to maintenance? Can a "scrubber tower" implode? If a "scrubber tower" fails or is destroyed, is there a back-up system, or replacement procedure in place? Where is the waste from the scrubber pollution going? Can the same, or better "scrubber" technology utilized in nuclear submarines and spacecraft be applied to 710 Tunnel Scrubber Towers? How will 710 Tunnel Environmental Authorities continuously regulate/monitor the atmospheric conditions inside and outside the tunnel region? As scrubber technology improves, can scrubber towers be upgraded?

3. Provide information on studies done to measure simultaneously Particulate Matter contamination emanating at both portals (i.e., same weather/seasons/day/hour). How will the Air Quality Descriptor for PM 2.5 and PM10 be articulated in relation to the 710 Tunnel? Will PM 2.5 and PM 10 particles be eliminated in the process of being scrubbed? What contaminants will be left over and breathed by citizens? Where will the tunnel portals begin? Allen? Concord? Valley Blvd.? Del Mar? How will mitigation measures be addressed at the portal entrances, and tower sites when the technology to control pollution is not proven, or does not exist? How much toxins/noxious gases/CO2/PM2.5/PM10 particles will cars and trucks release inside the 710 Tunnel per hour? Please provide low and high estimates. Will authorities shut down the tunnel when too many hazardous PM2.5 and PM10 particles are detected on any given day? How much smog will the 710 Tunnel's portals, and scrubber towers contribute to the local existing pollution? For example, how will this new source of smog affect the smog inversions that the communities of La Canada/Flintridge/Tujunga experience? How many tons of air pollution will the proposed scrubbers capture? How often will the proposed scrubbers need to be cleaned? Provide low and high estimates.

4. How would authorities mitigate the noise pollution during the construction of the 710 Tunnel? How will you recapture, and recycle water from any tunnel excavation encounters? Will authorities monitor noise levels, and pollution levels during construction? If levels exceed allowed limits, or the community's concern will they halt work for the day?

5. How will the Valley Blvd.-Alhambra Ave. Connector Road (part of the Low-Multi-Build Alternatives) benefit El Sereno? Compare and contrast the efficiency

and effectiveness between the Valley Blvd.-Alhambra Ave. Connector Road, a 710 Surface Freeway Route, and the 710 Tunnel. Provide all information on any and all environmental studies, or reports that have been done and completed near, and around the proposed 710 Tunnel. Indicate what efforts have been made to provide this information to the community of El Sereno. Provide any tangent plans that are being considered in conjunction to the 710 Tunnel in order to mitigate LA County traffic problems. For example, will a commuter train station be constructed in El Sereno between Alhambra Ave., and Valley Blvd.?

6. What formulas/strategies are being used to measure risk acceptability in relation to the 710 Tunnel? Provide all information on how safety, and risk assessments of the proposed 710 Tunnel figure into human and environmental degradation within the affected local communities? How many additional lives will be lost prematurely due to the 710 Tunnel pollution and traffic accidents? What are all the cost-benefit ratios? Is the risk of implementing the 710 Tunnel not greater than the level of pollution output currently used in modes of transportation?

7. Provide a number estimate of traffic that will move from the beginning southern part of the proposed 710 Tunnel to the exit in Pasadena. The number should include projected number of cars, commercial trucks, and other vehicles. Will truck traffic in the tunnel be limited? What will be the vehicle capacity for the 710 Tunnel? How many cars would be able to fit within the 710 Tunnel during bumper-to-bumper traffic? Approximately, how many trucks will fit inside the 710 Tunnel? What kind of hazardous materials will be allowed to travel through the 710 Tunnel? For example, will commercial trucks be allowed to carry tankers with acids and flammable liquids through the 710 Tunnel?

8. Describe the potential biohazards that both tunnel construction, and usage bring. How is the construction company going to prevent Valley Fever from affecting people when digging, and clearing soil debris? Will there be limited hours of construction? What are the current local industry's hazardous emissions around the proposed 710 Tunnel? How can these materials interact with the new air pollution that the 710 Tunnel will bring? How will they mitigate truck pollution during construction? For example, will pavements be used during tunnel construction to prevent excess dust? Where will all the trucks for hauling out debris be parked? How many trucks will be used to haul away dirt? Where will the excavated dirt be dumped? Again, can the dirt contain Valley Fever materials? Will the train system be used to haul out construction debris? How do authorities intend to mitigate, or address the noise problem caused by the train

during the day, and night?
9. How will the 710 Tunnel benefit the community of El Sereno? How many scrubber towers will be located in El Sereno, and what will be their locations? How many Construction staging areas will be located in El Sereno, and what are the locations of the staging areas?
10. How will a fire inside the 710 Tunnel be mitigated? Where there is fire there is smoke. How will untested scrubber towers filter all the hazardous smoke from inside a 710 Tunnel fire? Will the toxic smoke be allowed to escape through the scrubber towers, vents, emergency exits, and portals? Should fire-fighting foam be used to combat fire inside the tunnel? Can powerful fans be used to redirect the smoke above ground? Will there be double jeopardy during a fire? What kind of endangerment will inhabitants above ground face during a catastrophic fire within the 710 Tunnel? Will there be a sprinkler system installed inside the 710 Tunnel in order to mitigate fires?
11. Will homeowners who live directly over/adjacent to the 710 Tunnel have to relinquish their mineral rights?

12. Can Caltrans buy/build two tunnel boring machines? Having the boring machines simultaneously working at both ends could cut tunnel construction time in half. Why can't the boring machines be designed, and built by Americans within the United States?
13. After tunnel construction and cost, how many years will it take to break even? When will Los Angeles County start making its profits?
14. Will authorities compensate the community, and individuals for any illnesses related to PM2.5 and PM10 particles that would have originated from the 710 Tunnel site? Will they be given health insurance, or monetary benefits?
15. Will MTA provide medical experts to begin a comprehensive health study around the local communities that will be affected by the 710 Tunnel? Will an unbiased environmental overseer be hired to protect, and monitor the community's health and safety concerns during, and after construction?
16. What kind of security will merit monitoring the entire 710 Tunnel facilities? How will terrorist concerns be addressed? What will be done to safeguard the occupants in, and around the 710 Tunnel?
17. How much green space will be needed to offset the pollution that will be generated by the 710 Tunnel? How many fully mature trees will be needed to absorb vehicle exhaust emanating from both the portals, and scrubber towers?
18. How much will a toll road system cost to implement, and maintain?

19. Are current modes of production changing to prevent the harmful effects of pollution? Provide information that the Market Place will create alternative-affordable modes of transportation, and fuels by the time the 710 Tunnel is completed? For example, when will Fuel Cell Vehicles (FCV's) be readily available on a mass transit scale?
20. Will the 710 Tunnel engineers learn from all the errors that previous tunnel mishaps demonstrate? For example, people living around tunnel portals in Australia are suffering, and dying. The Big Dig in Boston is a fiasco. Will an independent panel of environmental experts review the 710 Tunnel EIR? Will a contact telephone number for all agencies, and government officials be provided to voice concerns and complaints during construction?
21. Logistically, would it be possible to evenly spread the amount of freight tonnage along the Pacific Rim harbors (San Diego, Long Beach, San Pedro, San Francisco, and Seattle). What would it take to ensure that a more efficient and effective On Time Delivery System be implemented? Would an upgraded of our national railway system help prevent unnecessary truck traffic through the counties of LA/Riverside/Ventura/ San Bernardino/San Luis Obispo, etc.? For example, can the coordination of freight goods that make their way towards the Midwest, or Northwest be dropped off at any of the northern bays rather than being distributed from the ports of Los Angeles or Long Beach?

22. Are the 710 Tunnel scrubber towers, and emergency exits going to be equidistant from each other? Indicate tower and exit locations. Can tower and exit locations be situated where there are no existing domiciles? If a scrubber tower is warranted in a residential neighborhood, can a four-block radius of green space circumscribe the scrubber tower?
23. How many people concerned about the 710 Tunnel have read ADVICE & PLANNING by Martin H. Krieger?

From: Pat Anderson - La Canada Chamber of Commerce [mailto:exec@lacanadaflintridge.com]
Sent: Monday, March 28, 2011 10:24 AM
To: SR710Conversations
Subject: RE: SR-710 Conversations: Street Name Not Correct for La Canada Flintridge
Dear Metro,

Please note the name of the street for the meeting in La Canada Flintridge is misspelled. You have Oak Drove Drive and it should be Oak Grove Drive.
This would make it difficult for anyone trying to locate the site via Google or other electronic media.

Thank you,

Pat Anderson
President & CEO
LCF Chamber of Commerce

From: Fatmeh Yassine [mailto:S.F.Yassine@sbcglobal.net]
Sent: Monday, March 28, 2011 7:04 PM
To: SR710Conversations
Subject: I'd like more information about Sr-710 Conversations

My name is Jason Yassine, I am currently enrolled in a journalism 4a class @ Pasadena City College. I'm required to attend a public meeting for a classroom assignment. Therefore, I would like to attend your 710 Freeway extension project meeting to fulfill my assignment. Please let me know if that would be possible. If so, can I obtain an agenda or additional information about the meeting?

Thank you,
Jason

From: Peter Wong [mailto:kaleungwong19@hotmail.com]
Sent: Wednesday, March 30, 2011 6:06 PM
To: SR710Conversations
Cc: Simon Wong
Subject: Oppose 710 Freeway Extension!!! Strongly oppose!!!

To Whom It May Concern:

My name is Peter Wong and my family and I are resident of Alhambra for 20+ years. We strongly oppose the Freeway extension or proposal from the 710 to the 210 freeway. It is detrimental in many negative ways such as Environmental impact and economic impact.

The freeway will only cause more air pollution and lower home prices in the area. There will be more noise caused in the area and we need not need any more freeway cutting through a quiet city.

Thank you,

Peter Wong

From: waynna kato [mailto:waynnakato@sbcglobal.net]
Sent: Wednesday, March 30, 2011 10:14 PM
To: SR710Conversations
Subject: Scoping Submissions

I am interested in responding to Scoping. Tell me the email address to send my letter. Thank you.
Waynna

From: Kristina Lockwood [mailto:KLockwood@greendotcorp.com]
Sent: Wednesday, March 30, 2011 3:08 PM
To: SR710Conversations
Subject: Concerns regarding 710 tunnel

Hello,

I am unable to attend the April 5 meeting regarding the 710 tunnel, but I have tremendous concerns regarding this project. I live in La Canada, and we already have terrible truck accidents on our stretch of the 210. In the last several months, we have had 2 trucks go over the side of the freeway, plus other accidents involving trucks that essentially shut down the entire freeway. Adding a tunnel from a port through our community will only serve to increase traffic tremendously, and will imperil our freeways and our community. Additionally, although sound walls were originally a condition of the building of the 210 freeway through our city, they still do not exist. Increased traffic will greatly impact our quality of life, as we hear loud trucks in the middle of the night.

Finally, what is the cost of this project? It sounds like we are undertaking California's version of the Big Dig, at a time when California is barely solvent and unable to keep up with its existing spending mandates. We have survived thus far without a 710 connector – this project seems foolhardy and wasteful given our current financial position.

Please feel free to contact me by return email or by phone at 818-790-0379.

Best regards,

Kristina Lockwood

Sat 4/2/2011 11:35 AM
I would like to know if the meeting about the SR-710 at La Canada High School on Tuesday, April 5, 2011 will be captioned for the hearing impaired. I see from your bulletin that language translation is available for **many different** languages and wonder if you have considered the hearing impaired also? There are many people who have difficulty following in these meetings and captioning would help not only those who wear hearing aids but those who are slightly hearing impaired and don't admit to a hearing problem.

sincerely,
Anne Hills
annehills@gmail.com

From: Smith, Michelle [mailto:SmithMi@metro.net]
Sent: Monday, April 04, 2011 10:21 AM
To: SR710Conversations
Cc: Govan, Cleavon
Subject: RE: Feedback - SR-710 Conversations [#22]

thank you very much.

MES

From: Valentino, Danielle **On Behalf Of** SR710Conversations
Sent: Monday, April 04, 2011 10:20 AM
To: Smith, Michelle
Subject: FW: Feedback - SR-710 Conversations [#22]

Michelle--

You already received these via e-mail early March-- however, per your request, I am re-sending them to you now for quick reference...

Thanks,

-dv

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, March 09, 2011 12:07 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#22]

Name *	Clyde Williams
Email (you@email.com) *	ctwiliams@yahoo.com
Phone Number	(323) 528-9682
Address	4115 Barrett Road Los Angeles, CA 90032 United States
Select a Subject *	Comment for scoping record

Comment *

As of 9 March no relevant office within the City of Los Angeles government has received the Notice of Preparation - Please Send - ken.husting@lacity.org

Addressees for outreach in ElSereno

joseaguilarcd14@hotmail.com, RJNSON08@sbcglobal.net, victorjune@yahoo.com, falconn_la@yahoo.com, johnnycarbajal@hotmail.com, thegoodshepherd62@gmail.com, reckoner73@gmail.com, outwardscottla32@yahoo.com, franklarez@sbcglobal.net, AMERIKAIMAGEINC@yahoo.com, rosehillsreview@yahoo.com, val@valsdesignstudio.com, LindaM@organizedsportswear.com, lindamcguire2003@aol.com, moverstreet@sbcglobal.net, hugoleopacheco@yahoo.com, ctwiliams@yahoo.com, eddie.chow@sbcglobal.net, eddieschow@gmail.com, "Carlos Morales" , "Liu, Grayce"

CTW

From: Mary McCormick [mailto:Mary@mbimedia.com]
Sent: Monday, April 04, 2011 9:37 AM
To: SR710Conversations
Cc: Valentino, Danielle; Jim Hattendorf; Chris Prouty; Stephanie Chan
Subject: Additional Request

Danielle,
We are in the process of determining how best to provide this service. It will be an additional cost. We will do our best to accommodate this request. Thanks. Mary

From: Valentino, Danielle [mailto:ValentinoD@metro.net] **On Behalf Of** SR710Conversations
Sent: Monday, April 04, 2011 9:06 AM
To: Mary McCormick
Subject: FW: SR-710 Meeting, April 5, 2011
Importance: High

The request for captioning the April 5th meeting also came through to our SR-710 inbox over the weekend from an "Anne Hills"--

I realize this request came in under the 3 business day requirement. However, it would be great if we could provide this service at our April 5th meeting.

Thanks in advance for letting me know if MBI has provided this in the past and can provide at the April 5th meeting.

-Danielle

From: Anne Hills [mailto:annehills@gmail.com]
Sent: Saturday, April 02, 2011 11:35 AM
To: SR710Conversations
Cc: Pat Anderson
Subject: SR-710 Meeting, April 5, 2011

I would like to know if the meeting about the SR-710 at La Canada High School on Tuesday, April 5, 2011 will be captioned for the hearing impaired. I see from your bulletin that language translation is available for **many different** languages and wonder if you have considered the hearing impaired also? There are many people who have difficulty following in these meetings and captioning would help not only those who wear hearing aids but those who are slightly hearing impaired and don't admit to a hearing problem.

sincerely,
Anne Hills
annehills@gmail.com

From: marion krocos [mailto:mkrocos323@earthlink.net]
Sent: Monday, April 04, 2011 10:56 AM
To: SR710Conversations
Subject: Re: Join us for additional Scoping Meetings for SR-710 Conversations in La Canada Flintridge (Tuesday) and Highland Park (Wednesday).
PLEASE DELETE MY E-MAIL FROM YOUR ROOSTER, YOUR MEETINGS ARE NOT GEARED FOR THE "NEIGHBOR"
CONCERNS THEREFORE, I AM NOT INTERESTED IN ATTENDING. WE HAVE MANY ISSUES HERE IN EL SERENO, BUT
YOUR MEETINGS ARE GEARED FOR TUNNELS WHICH MAY NEVER COME TO FRUITATION. YOU ARE NOT LISTENING TO US TOO BAD WE ARE NOT IN ALHAMBRA OR PASADENA.

MOST SINCERELY,

MARION KROCOS

From: Smith, Michelle [mailto:SmithMi@metro.net]
Sent: Monday, April 04, 2011 10:29 AM
To: SR710Conversations
Subject: RE: Feedback - SR-710 Conversations [#19]
Yes, thx again!!

MES

From: Valentino, Danielle **On Behalf Of** SR710Conversations
Sent: Monday, April 04, 2011 10:28 AM
To: Smith, Michelle
Subject: FW: Feedback - SR-710 Conversations [#19]

Michelle--you have already received this one too (from Dr. Williams)-- however, I wanted to forward onto you since you mentioned that would be easier if you had at the top of your inbox...

-dv

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, March 02, 2011 3:45 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#19]

Name *	Clyde Williams
Email (you@email.com) *	ctwiliams@yahoo.com
Phone Number	(323) 528-9682
Address	4115 Barrett Road Los Angeles, CA 90032-1712 United States
Select a Subject *	Add me to the mailing list
Comment *	I have not been added to the mailing list as I have not received anytthing Also I requested by phone access to the NOP/NOI issued on Monday but to date have not received ANY message regarding the NOP/NOI Please extend the Scoping Period and add at least 4 meeting locations in NELA and LaCanadaFlintridge areas

Mon 4/4/2011 10:42 PM

Name *	Robert Westcott
Email (you@email.com) *	bobwestcott@gmail.com
Phone Number	(626) 576-2738
Address	2100 Westmont Dr. Alhambra, CA 91803 United States
Select a Subject *	Comment for scoping record

Comment *

I agree with the woman at the "conversations" meeting who said, "Y'all have been having meetings for 35 years, now get out your pick and shovel and start digging!" Specifically, over the 35 years of studies, and meetings, we all know that no one wants a freeway going through their neighborhood, so a tunnel is the only option. Engineers who specialize in building highway tunnels say that the technology is such that there is essentially no impact on surface structures, so I see no problem with moving forward. When it is built, two things we absolutely need are 1) an exit at Huntington Drive. 2) CO monitors with digital readouts to display the levels of CO in the tunnel. Also, if not already done, we need to get a waiver for the state to be able to sell the real-estate we've acquired along the route at market value (not just what we purchased it for) and then use those funds toward construction of the tunnel.

From: HARDWOOD FLOORS LA [mailto:hardwoodfloorsla@msn.com]

Sent: Monday, April 04, 2011 12:11 PM
To: SR710Conversations
Subject: RE: BUILD THE 710

Please do what is better for the whole (Los Angeles and the 10 million residents) and not just a few people (Pasadena, So Pasadena) who have fought to not build this extension the last 40 years. The whole city is wasting more gas and time by not having this extension built.

I did provide a physical address the last time.

Here is again

16431 Gilmore Street
Van Nuys, Ca 91406

Please let me know if you need anymore infomation.

Thank you,
Raymond Nakamura
16431 Gilmore Street
Van Nuys, CA 91406
(323) 646-6100

From: SR710Conversations@metro.net
To: hardwoodfloorsla@msn.com
Date: Mon, 4 Apr 2011 10:36:04 -0700
Subject: RE: BUILD THE 710

Raymond,

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your physical address (along with your comment).

I do not see your physical address included in your submission below.

Comments intended for official consideration in the administrative record will be accepted through April 14th. (Again, as long as they include full name and physical address).

From: Peter Wong [mailto:kaleungwong19@hotmail.com]

Sent: Monday, April 04, 2011 9:32 PM
To: SR710Conversations
Subject: RE: Oppose 710 Freeway Extension!!! Strongly oppose!!!

Our address is 3200 W. Commonwealth Ave., Alhambra, CA 91803.

Thanks,

Peter

From: SR710Conversations@metro.net
To: kaleungwong19@hotmail.com
Date: Mon, 4 Apr 2011 09:22:06 -0700
Subject: RE: Oppose 710 Freeway Extension!!! Strongly oppose!!!

Peter,

Thank you for your comment.

If you would like your comment to be considered in the official administrative record, please provide your physical mailing address along with your comment. I do not see your address included in your submission below.

Thanks in advance.

From: Peter Wong [mailto:kaleungwong19@hotmail.com]
Sent: Wednesday, March 30, 2011 6:06 PM
To: SR710Conversations
Cc: Simon Wong
Subject: Oppose 710 Freeway Extension!!! Strongly oppose!!!

To Whom It May Concern:

My name is Peter Wong and my family and I are resident of Alhambra for 20+ years. We strongly oppose the Freeway extension or proposal from the 710 to the 210 freeway. It is detrimental in many negative ways such as Environmental impact and economic impact.

The freeway will only cause more air pollution and lower home prices in the area. There will be more noise caused in the area and we need not need any more freeway cutting through a quiet city.

Thank you,

Peter Wong

From: waynna kato [mailto:waynnakato@sbcglobal.net]
Sent: Monday, April 04, 2011 9:00 PM
To: SR710Conversations
Subject: Re: Scoping Submissions

Thank you.

From: SR710Conversations <SR710Conversations@metro.net>
To: waynna kato <waynnakato@sbcglobal.net>
Sent: Mon, April 4, 2011 9:11:19 AM
Subject: RE: Scoping Submissions

Hi Waynna,

Please see the list below regarding the many different ways you can submit your scoping comment for the official administrative record:

(Please note that #3 in the list below provides the e-mail address in the event you prefer to send your letter/comments via e-mail. Please remember to include your full name and your physical mailing address in your submission).

6 ways to submit your scoping comment for the administrative record:

1. Submit written comments on comment cards provided at community scoping meetings.
2. Submit scoping comments via Online Comment/Question form. (http://www.metro.net/projects/sr-710-conversations/)
3. Submit scoping comments via e-mail at sr710conversations@metro.net
4. Oral comments will be recorded by a Court Reporter during community scoping meetings.
5. Virtual Meeting Online from March 21 through April 14, 2011
6. Mail comments to:
   Ron Kosinski, Deputy District Director
   Caltrans District 7
   100 S Main St
   Los Angeles, CA 90012

NOTE: All comments must include full name and physical address in order to be considered in the official administrative record. Scoping comments will be accepted through April 14th, 2011.

From: Kristina Lockwood [mailto:KLockwood@greendotcorp.com]
Sent: Monday, April 04, 2011 2:06 PM
To: SR710Conversations
Subject: Re: Concerns regarding 710 tunnel

Thank you. My physical address is:

4362 Beulah Drive
La Canada Flintridge, CA 91011

Sent from my BlackBerry Wireless Handheld

From: SR710Conversations [mailto:SR710Conversations@metro.net]
Sent: Monday, April 04, 2011 09:26 AM
To: Kristina Lockwood
Subject: RE: Concerns regarding 710 tunnel

Kristina,

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your physical address (along with your comment).

I do not see your physical address included in your submission below.

From: Kristina Lockwood [mailto:KLockwood@greendotcorp.com]
Sent: Wednesday, March 30, 2011 3:08 PM
To: SR710Conversations
Subject: Concerns regarding 710 tunnel

Hello,

I am unable to attend the April 5 meeting regarding the 710 tunnel, but I have tremendous concerns regarding this project. I live in La Canada, and we already have terrible truck accidents on our stretch of the 210. In the last several months, we have had 2 trucks go over the side of the freeway, plus other accidents involving trucks that essentially shut down the entire freeway. Adding a tunnel from a port through our community will only serve to increase traffic tremendously, and will imperil our freeways and our community. Additionally, although sound walls were originally a condition of the building of the 210 freeway through our city, they still do not exist. Increased traffic will greatly impact our quality of life, as we hear loud trucks in the middle of the night.

Finally, what is the cost of this project? It sounds like we are undertaking California's version of the Big Dig, at a time when California is barely solvent and unable to keep up with its existing spending mandates. We have survived thus far without a 710 connector – this project seems foolhardy and wasteful given our current financial position.

Please feel free to contact me by return email or by phone at 818-790-0379.

Best regards,

Kristina Lockwood

From: Alexander the Great [mailto:alek3000@sbcglobal.net]
Sent: Monday, April 04, 2011 11:33 AM

To: SR710Conversations
Subject: RE: [REVISED SUBMISSION] 710 fwy expansion project

Dear Metro,
per your instruction -
here is my revised comment submission, including my full address.

Dear Metro,
I am entirely against the 710 fwy project,
and support the views of most residents (who oppose the project as well).
I would strongly advise to save this investment
and - instead of spending on the wasteful 710 project - please redirect it to improve bus service in Los Angeles; this has much more need than the 710 road tunnel.
As you know, as an attempt to "balance the budget" Metro has been cutting bus service, which ultimately made traveling by buses very frustrating, long, tiresome experience, (and reduced service will always cause ridership to drop). So, redirecting the 710 project funds to restore recently cut bus service would much better utilize your financial resources.
Thank you for your consideration.
I strongly believe Metro will use common sense and spend the money where it's mostly needed - i.e. on improving the bus service instead of wasting on automobile tunnel projects.
Yours truly,

Alexander Friedman
1330 N. Orange Dr., Apt 106
Los Angeles, California
(323) 465-8511

--- On **Mon, 4/4/11, SR710Conversations *<SR710Conversations@metro.net>*** wrote:

From: SR710Conversations <SR710Conversations@metro.net>
Subject: RE: 710 fwy expansion project
To: "'alek3000@sbcglobal.net'" <alek3000@sbcglobal.net>
Date: Monday, April 4, 2011, 9:31 AM

Alexander,

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your full physical address (along with your comment).

Your full address was not found in your submission below.

From: Alexander the Great [mailto:alek3000@sbcglobal.net]
Sent: Friday, March 25, 2011 10:40 AM
To: SR710Conversations
Subject: RE: 710 fwy expansion project

Dear Metro,
I am entirely against the 710 fwy project,
and support the views of most residents (who oppose the project as well).
I would strongly advise
to save this investment
and - instead of spending on the wasteful 710 project - please redirect it to improve bus service in Los Angeles; this has much more need than the 710 road tunnel.
Thank you for your consideration.
I strongly believe Metro will use common sense and spend the money where it's mostly needed - i.e. on improving the bus service (which has been drastically reduced) instead of wasting on automobile tunnel projects.
Yours truly,

Alexander Friedman
Los Angeles, California
(323) 465-8511

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Monday, April 04, 2011 10:42 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#34]

Name *	Robert Westcott
Email (you@email.com) *	bobwestcott@gmail.com
Phone Number	(626) 576-2738
Address	2100 Westmont Dr. Alhambra. CA 91803

	United States
Select a Subject *	Comment for scoping record
Comment *	I do not support the "No Built" option, however, if you do include that option, please define "No Build" as "Completion of the 710 north to Huntington Drive." My point is that it would not be appropriate to permanently terminate the 710 at Valley Blvd. It must be completed at least to Huntington Drive; above ground if that is more practical/economical.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Monday, April 04, 2011 11:12 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#35]

Name *	Robert Westcott
Email (you@email.com) *	bobwestcott@gmail.com
Phone Number	(626) 576-2738
Address	2100 Westmont Dr. Alhambra, CA 91803 United States
Select a Subject *	Comment for scoping record
Comment *	I do not support the "No Built" option, however, if you do

include that option, please define "No Build" as "Completion of the 710 north to Huntington Drive." My point is that it would not be appropriate to permanently terminate the 710 at Valley Blvd. It must be completed at least to Huntington Drive; above ground if that is more practical/economical.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, April 05, 2011 3:16 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#36]

Name *	Chris Appelhans
Email (you@email.com) *	cappelhans@hotmail.com
Address	4848 Ray Ct Los Angeles, CA 90041 United States
Select a Subject *	Comment for scoping record

Comment *

Regarding the 710 Tunnel Project

I find it disturbing that the city of Los Angeles plans to build a tunnel so that diesel trucks can haul freight through the backyards of its own citizens. What century is this? Are there also plans to build coal-fired powerplants to run our air-conditioners during the summer?

At a time when green technology and alternative forms of freight distribution are emerging across the globe, it is pathetic that CalTrans would be willing to waste 20 years and billions of dollars on such an antiquated system.

A project like this harms not only the citizens – whose lives and neighborhoods are ruined by smog, noise and congestion; but it damages Los Angeles' reputation as a healthy, modern metropolis. Have you been to Shanghai? Do you want to live under a blanket of diesel smoke?

Spend that 5 billion developing an electric train system that can move freight from the Port of LA to the outskirts of the city and the freeways that take it inland.

You have an opportunity to act courageously – to give future generations a chance to enjoy this beautiful place we live.

So find a better solution. Because if you don't, the concerned citizens of this city will fight you every step of the way.

Sincerely,
Chris Appelhans

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, April 05, 2011 4:09 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#37]

Name *	James Stoker
Email (you@email.com)	jstoker@ucla.edu

*

Phone Number	(818) 790-2832
Address	4555 Encinas Dr La Canada Flintridge, CA 91011 United States
Select a Subject *	Comment for scoping record

Comment *

1. The initial study area for this EIR unfairly eliminates communities along the 210 freeway West of the proposed project -- Altadena, La Canada Flintridge, La Crescenta, Tujunga, and Sun Valley.

2. While traffic projections have been provided for the "no build" option, the project has failed to provide traffic projections for any of the proposed "build" options. Traffic projections for the "no build" option fail to consider the impact of $5/gallon gasoline and rampant unemployment -- both present realities that are projected to continue for some time.

3. The portion of the 210 freeway West of the "gap area" is a very sensitive area with regard to air pollution. Historically this area once had the some of the healthiest air in the United States. With the introduction of the 210 freeway the air became quite unhealthy in this area. I speak from experience, having lived in La Canada Flintridge most of the last forty years. I live less than 1 block from the freeway. My children attend schools that are immediately adjacent to the freeway. When I moved to LCF in 1971 my lungs were healthy. Six years later they were permanently scarred from excessive excessive exposure to ozone an particulates. I walked or rode a bicycle to school each day, and delivered newspapers from a bicycle each afternoon. The exceesive exposure to air contaminants -- mostly originating from the 210 freeway -- eventually scarred my lungs.

The "build" options all seem to promise greatly increased traffic through LCF on the 210 freeway, and greatly increased air pollution. We need to see a careful study of the impact on air quality, both for nearby residents and students at schools adjacent to the 210 freeway. And we need to see careful modelling of how prevailing atmospheric conditions can cause devastating concentration of air contaminants in the narow valley which LCF occupies.

This gap cannot be filled without providing seems means to mitigate its impact on air quality -- and quality of life in LCF.

4. Freeway noise has had a devastating impact on the quiet neighborhoods of LCF. Often our sleep is disturbed by heavy bursts of traffic noise at night and in the early morning. The tunnel in downtown LCF serves as a giant megaphone, amplifying traffic noise and projecting it across large parts of the community. I often walk over the freeway on the Indiana Overcrossing link trail on my way to and from work. This trail crosses a flume about 150 yards from the 210 freeway tunnel. The sound levels of the traffic noise on that bridge often exceed 90 dbA.

Yet this project seeks to increase traffic and noise. Obviously there needs to be some mitigation for the increased noise levels. But honestly, I dont know how the megaphone effect can be mitigated by anything short of reduced traffic levels.

5. Traffic safety along state highways has been a major issue in LCF. An accident involving a large semi-trailer truck on the Angeles Crest Highway drew national attention -- and prompt action by state legislators. Less noticed has been a long series of traffic accidents of late involving semi's along the 210 through LCF. Drivers are falling asleep in record numbers. One crash came very close to crashing into a busy McDonalds restaurant.

Increased traffic to and from the 710 along the 210 through LCF would undoubtedly include a drastic increase in truck traffic. Truck traffic heading East on the 210 through LCF would probably include many trucks rushing to finish the final leg of their trips to the busy ports at the end of the 710.

Clearly this is a recipe for disaster, as exhausted drivers push to finish their trips.

The mitigation for issues along the Angeles Crest highway was to forbid trucks on that strect of highway. If the 710 gap is closed I think the same sort of mitigation would be required along this stretch of the 210 freeway -- if it were even possible.

6. The 210 freeway passes over and briefly travels beside an undeveloped stream (Flint Canyon) at the Eastern border of La Canada Flintridge. Trash from the freeway finds its way into both the stream and onto an adjacent trail. Increased traffic would bring increased trash and pollutants, along with the greater probability of toxic spills into this stream which in turn flows into the impacted LA River. So mitigation would be needed to ensure the protection of that waterway as well.

The bottom line is simple: the completion of the 710 would be an unmitigated disaster for the environmentally sensitive area of La Canada Flintridge. There are many areas environmental impacts which need to be examined -- and many community impacts from the increased traffic.

Instead, we need to pursue the path our president has marked out for us: finding transportation alternatives.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, April 05, 2011 4:53 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#38]

Name *	Audrey Diehl
Email (you@email.com) *	audrey_diehl@yahoo.com
Address	

	Los Angeles, CA 90065 United States
Select a Subject *	Comment for scoping record

Comment *

As a resident of Mt. Washington, I want to express my opposition to a 710 tunnel that would be extremely expensive and potentially destroy large chunks of the vibrant communities of Glassell Park, Cypress Park and Mt Washington. Our communities are historic, beautiful and a wonderful example of the economic, cultural and racial diversity of Los Angeles. A freeway tunnel built through our neighborhoods--specifically the tunnel routes 1 and 2--would harm communities and, most importantly, make very little sense.

Why would someone take a tunnel, and pay a toll, to go all the way West to the 2 Northbound and then back East on the 134 to the 210? They wouldn't! They'd just take the 5 freeway from where it intersects the 710 in East Los Angeles. As someone who travels Northbound on the 5 freeway every weekday, I can tell you that heavy traffic is rarely a problem. Building an expensive and dangerous tunnel is certainly not a necessary "fix." It wouldn't fix anything, and would instead create more problems for more Los Angeles residents.

Please consider other options to move freight from the Port of Los Angeles, including rail lines. Any money spent by Metro and Cal Trans at this time should be to find modern, sustainable, less-polluting solutions to transportation needs. Those solutions would benefit ALL the citizens of Los Angeles by providing better air quality and getting some of the huge trucks off the road.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, April 05, 2011 5:11 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#39]

Name *	Robert Westcott
Email (you@email.com) *	bobwestcott@gmail.com
Phone Number	(626) 576-2738
Address	2100 Westmont Dr. Alhambra, CA 91803 United States
Select a Subject *	Comment for scoping record

Comment *

Regardless of what option is decided for the 710 between Huntington Drive and the 210, PLEASE, PLEASE, PLEASE complete the segment between Valley Blvd and Huntington Drive, NOW!! the reasons for this are 1) Major traffic congestion along Valley Blvd and Fremont Ave. 2) Even if a "No Build" option is decided for the path through South Pasadena, the 710 MUST be extended at least to Huntington Drive, for Valley Blvd is an unacceptable terminus for the freeway. 3) This segment is in Los Angeles county so there should be no objections from South Pasadena. 4) Surface construction would be fine for this segment, so cost and engineering would be relatively minimal compared to underground. For the record, I support a tunnel north of Huntington Drive, and an underpass at Huntington, but that underpass would not need to be built until the tunnel was completed.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 06, 2011 3:20 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#40]

Name *	Rosemary Surina
Email (you@email.com) *	rsurina@yahoo.com
Address	3752 Latrobe St. Los Angeles, CA 90031 United States
Select a Subject *	Comment for scoping record

Comment *

As a homeowner in Montecito Heights (and a voter who approved Measure R), I strongly oppose the extension of the 710 freeway to the 210 via tunnel bored under any of the hillsides in Northeast Los Angeles or the San Gabriel Valley, and most particularly under the area in which I currently live. I feel that the proposed tunnels will be ineffective in truly alleviating traffic and destructive to our neighborhoods and the environment. The residents over the years have worked very hard to preserve the natural environment in and around the Arroyo Seco, and this will destroy all of that with the increased auto and truck traffic. We chose to build our future in this wonderful neighborhood due to its natural beauty and relative quiet, given its location in the midst of the city. Please don't ruin that for us or for any of the local communities that are currently in the potential path of the tunnel zones under consideration.

As an alternative, I strongly urge Metro and Caltrans to consider low-build, multi-mode alternatives, including building light-rail systems and increasing the number of bicycle lanes in cities through Northeast L.A. and the San Gabriel Valley. I understand all too well the need to alleviate traffic (as I sit in it every day as I commute to work in Santa Monica) but we have to think of 21st century solutions, and not just focus on expensive, out-dated 20th century ideas. Plans initially drawn up in the 1950s

don't apply to the Los Angeles in 2011, and they certainly won't work for the LA of 2061. I urge you to exhibit true innovation and leadership in identifying efficient, more environmentally-friendly, multi-mode ways of connecting the people and goods that need to move through Southern California.

Thank you for the opportunity to comment and publicly state my opposition to the current tunneling plan.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 06, 2011 4:24 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#41]

Name *	Dr. Lee Hamby
Email (you@email.com) *	arlandom@att.net
Phone Number	(626) 458-7795
Address	2212 Westminster Ave. Alhambra, CA 91803 United States
Select a Subject *	Comment for scoping record

Comment *

I am in favor of closing the gap of the 710 to the 210. I support either a tunnel or a surface approach. We have fought the traffic battle on Fremont which is our main street for access to our home for years. I often sit through two or three signal changes when traffic is heaviest. The air quality to suffers and tempers are short. The report should indicate what happens to city streets when more traffic is on freeways: reduced congestion, reduced repairs, and speedier commutes for those connecting to I-210 from I-710. As you know I-710 is a major truck route and we get many trucks running through our city who would use the freeway connector. We have waited thirty plus years for action, now is the time to do your best to make this happen. A tunnel does not disturb any of the precious houses of South Pasadena, and you can do surface in Alhambra, my neighbors and I have often discussed this issue and wonder why a few keep the majority so bottled up. Thank you for your

consideration of my comments.

Sincerely

Dr. Lee Hamby

Metro

SR-710 Conversations – A Series of Information Meetings

Received 4/6/11 per MES + DV

Saturday February 26, 2011

NAME: Bonnie Lawler

ADDRESS: 2717 Altura Ave CITY: La Crescenta ZIP: 91214

REPRESENTING: the much unheard taxpayer

Please drop comments in the Comment Box or:
Mail to: Michelle Smith
One Gateway Plaza
Mail Stop: 99-22-9
Los Angeles, CA 90012

Comments related to topics covered in Series 1 and Series 2 meetings (please print):

I HIGHLY oppose the construction of the 710 connector. As a taxpayer I am hoping I have some say in what happens. I fear for what it will do to the already congested 210 freeway.

Note: Comments specifically for scoping will be accepted into the official administrative record beginning February 28, 2011 concurrent with publication of the Notice of Intent /Notice of Preparation. Scoping comment closing date will be April 14, 2011. Comments received prior to February 28, 2011 will not be included in the official administrative record.

Metro

SR-710 Conversations – A Series of Information Meetings

Received 4/6/11 per MES

Saturday February 26, 2011

NAME: Pamela Lawler

ADDRESS: 2717 Altura Ave CITY: La Crescenta ZIP: 91214

REPRESENTING: home owner in Crescenta Valley

Please drop comments in the Comment Box or:
Mail to: Michelle Smith
One Gateway Plaza
Mail Stop: 99-22-9
Los Angeles, CA 90012

Comments related to topics covered in Series 1 and Series 2 meetings (please print):

I oppose the 710 connector in any form!
It will decrease the quality of life in the Crescenta Valley, increasing pollution, noise, truck traffic
It is a waste of tax payer money - this is not the direction we should be concentrating on - to increase and encourage trucks for goods transportation from the harbor area
It would cut through a seismically active area and increase threat to lives if such an event should occur.

Note: Comments specifically for scoping will be accepted into the official administrative record beginning February 28, 2011 concurrent with publication of the Notice of Intent /Notice of Preparation. Scoping comment closing date will be April 14, 2011. Comments received prior to February 28, 2011 will not be included in the official administrative record.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 07, 2011 12:05 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#42]

Name *	Edmund Farrell
Email (you@email.com) *	efarrell@murchisonlaw.com
Phone Number	(213) 503-4698
Address	2703 Franklin St La Crescenta, CA 91214 United States
Select a Subject *	Comment for scoping record

Comment *

As a member of the community which will be adversely impacted by the completion of the 710 connection via tunnel, I would like to voice my strong opposition to such a project. I have been a long time resident of La Crescenta and the noise from the 210 through my neighborhood is deafening at times. The thought of additional truck traffic on the 210 (and there would be if the connection is completed) through the La Crescenta area is unacceptable. The area will suffer not only from additional noise and conjection, but increased air pollution along the 210 route. Keep in mming that there are at least three schools (two elementary and one high school) in very close proximity to the

210. No, No, no to the tunnel extention

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 07, 2011 12:09 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#43]

Name *	David Rennels
Email (you@email.com) *	rennels@cs.ucla.edu
Phone Number	(818) 790-2195
Address	4519 Alveo Rd. La Canada Flintridge, CA 91011 United States
Select a Subject *	Comment for scoping record

Comment *

Completion of the 710 will do tremendous damage to the residential environment of Foothill area. We have no sound walls and the noise is excessive. The 210 is already heavily traveled at rush hour, and the connection will make things worse. The existing 710 is a dangerous mess since it handles so much heavy truck traffic from the harbor. Connecting it will simply extend the pain since most of that traffic will go through prime residential areas.

With the price of fuel going up and freeways badly damaged by trucks, the only environmentally and

fiscally sound approach in the long term is to invest in rail and get many of the trucks off of the heavily travelled freeways. That should save a few tens of lives a year from car/truck accidents, reduce precious fuel costs, and better meet government pollution regulations.

This may not be in Caltrans best interests or the best interest of truckers and some favored contractors, but it is in the best interests of the people. Train-to-truck terminals can best be constructed in the desert. Lack of proper public investment in the past doesn't mean that we have to dig deeper into the same hole.

From: Rick Nathanson [mailto:ricknath777@gmail.com]
Sent: Thursday, April 07, 2011 1:04 PM
To: Ron_Kosinski@dot.ca.gov; SR710Conversations
Subject: 710 Fwy Extension

April 7, 2011

Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans – District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

Dear Mr. Kosinski,

As a longtime resident of La Crescenta, my wife and I have seen many changes to our community, County and State. Some of them have been good changes and others of them not so good.

Sometimes we have worked hard to have changes made and been delighted when the changes went our way. Other times we have lost the debate and learned to live with the results of our defeat.

Now we are set upon a mission, the proposed change of which is on a greater scale than ever before. We who live here and along the corridor of the proposed 210 Freeway extension, the very residents who will be most greatly affected, cannot bear the burden of a decision not in our favor.

The rumbling noise of increased traffic, the acrid fragrance of the diesel exhaust, the additional volume of particulates, all of which show up at our doorstep 24 hours per day, can only multiply in their insidious way by allowing the 210 Freeway extension to proceed.

Increasing the flow of traffic and of "big rigs" in particular, through the East / West 210 Freeway corridor will seem like a death sentence to all of us who live here. Physically, mentally and financially this is the wrong idea for our schools along this route, our communities and our State and Federal budgets, as well.

I am shocked to learn that the communities of La Canada / Flintridge, La Crescenta, Tujunga and Sunland have not been included in the impact studies which have been occurring with regard to this proposed extension. If these communities are not included immediately, we will have no opportunity to fairly voice our concerns, and that is just not fair OR American.

It is my understanding that the proponents of this extension do not live here. We do, you and I.

I trust in you to lead this in the right direction.

Please contact me if there is some way I can be of service to you or our mission to curtail this extension.

Sincerely,

Rick Nathanson

* *
Rick Nathanson
Mobile: +818 / 359-3092
Home: +818 / 957-1701
* *

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 07, 2011 1:13 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#44]

Name *	Rick Nathanson
Email (you@email.com) *	ricknath777@gmail.com
Phone Number	(818) 957-1701
Address	2849 Harmony Place La Crescenta, CA 91214 United States
Select a Subject *	Add me to the mailing list

Comment *

As a longtime resident of La Crescenta, my wife and I have seen many changes to our community, County and State. Some of them have been good changes and others of them not so good.

Sometimes we have worked hard to have changes made and been delighted when the changes went our way. Other times we have lost the debate and learned to live with the results of our defeat.

Now we are set upon a mission, the proposed change of which is on a greater scale than ever before. We who live here and along the corridor of the proposed 210 Freeway extension, the very residents who will be most greatly affected, cannot bear the burden of a decision not in our favor.

The rumbling noise of increased traffic, the acrid fragrance of the diesel exhaust, the additional volume of particulates, all of which show up at our doorstep 24 hours per day, can only multiply in their insidious way by allowing the 210 Freeway extension to proceed.

Increasing the flow of traffic and of "big rigs" in particular, through the East / West 210 Freeway corridor will seem like a death sentence to all of us who live here. Physically, mentally and financially this is the wrong idea for our schools along this route, our communities and our State and Federal budgets, as well.

I am shocked to learn that the communities of La Canada / Flintridge, La Crescenta, Tujunga and Sunland have not been included in the impact studies which have been occurring with regard to this proposed extension. If these communities are not included immediately, we will have no opportunity to fairly voice our concerns, and that is just not fair OR American.

Please contact me if there is some way I can be of service to you or our mission to curtail this extension.
(Sent via e-mail to Mr. Ron Kosinski, Deputy District Director Division of Environmental Planning on 4/07/11)
RN

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 07, 2011 8:16 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#45]

Name *	Jayne Bordy
Email (you@email.com) *	ravenjay2@hotmail.com
Select a Subject *	Comment for scoping record
Comment *	I wish to be added to the vast number of citizens opposed to the 710 freeway extension. In this economy, spending billions on an extension that will only create more traffic is wrong. We should be seeking alternate routes such as light rail. The added pollution and congestion plus the cost are the wrong way to go. Jayne Bordy

---

From: Therrien's [mailto:therrien5@sbcglobal.net]
Sent: Thursday, April 07, 2011 8:52 PM
To: Customer Relations
Subject: AR710conversations

Metro Customer Relations,

Unfortunately, I missed the meeting at the La Canada High School cafeteria this week and the local paper gave me this site information so that I may 'put in my 2 cents' for your consideration regarding your proposal/studies on the connection 710 to 210. Regardless of which proposal you decide on---tunnel, no tunnel....regardless, you still have issues that won't go away.....

As I read in the paper, you have not considered La Canada, La Crescenta or Glendale in your studies on environmental impact in regards to this project. Was that an intentional oops? It seems if you are adding traffic and exhaust emissions to our local freeway, we should most definitely be part of the discussion. I have lived in La Canada since 1993 and I remember what a lovely freeway we had before you connected 210 to 15. Wow! Ever since then, I have definitely seen high volume traffic, especially during commuter times. Today, I can forget driving to Pasadena from 3:00 p.m. to 7:00 p.m. weekdays because of the high-volume of traffic. And Fridays after work, forget about it....people going to Vegas, Palm Springs, Mammoth, Big Bear, etc. for the weekend are on 210---better avoid 210 after 1:30 p.m. those days!!!! Also, it doesn't matter if you are in carpool lane or not, they all move at a snail's pace. Seriously, you are actually thinking of dumping more vehicles on 210 by connecting 71???? Why????

I understand that Alhambra area supports connecting 71 to 210 because they want to relocate their traffic problems into our neck of the woods. I don't blame them, however, you haven't solved anything, you've just moved the problem to another community. Furthermore, you've intentionally and knowingly dumped

environmental issues smack dab into our schools and neighborhoods. With the studies today regarding permanent asthma symptoms plaguing our youth, what makes you even contemplate connecting 71 to 210????That leads me to think you haven't thought this out completely.

As much as the people with the money appear to be pushing this (that's the only thing that makes sense regardless of whatever position you counter with), I can't believe their money will cover all the lawsuits you will incur resulting from the environmental/health issues you will force us to live with by connecting 71 to 210.

Furthermore, we already have high traffic volume....we aren't that cute little freeway prior to the 15 connection anymore...this freeway can't take on any addition burden than it already has. Before the 15 and 210 connection, I'm sure 210 looked enticing to Metro....however, since that connection, you can't seriously think 210 can handle any more traffic. Seriously, you have a problem....but moving your problem to La Canada and surrounding areas will not fix your problem. You will still have the same problem, and in all likelihood, moving the problem to our neighborhood will cause more headaches than you could possibly imagine....**nothing** is worth that.

Sound walls????....what about exhaust asborping walls???? What about additional volume of accidents waiting to happen???? Oh, you do have issues and with all the technically we have today, I still don't see any solution that would help relieve Alhambra's issues. I do feel for them....but I also know it makes no sense to spend a dime on this if it doesn't fix the problem. And it's not okay to make Alhambra's problems, our problem....two wrongs do not make it right....everyone will lose on this project. Stop wasting money.....the State can't afford this misuse of funds.

Thank you for your time and consideration.

Faye Therrien
5155 Oakwood Ave.
La Canada, CA 91011

From: Ray Ray [mailto:casacrib@gmail.com]
Sent: Thursday, April 07, 2011 8:52 PM
To: SR710Conversations
Subject: PLEASE BULID THIS 710 FREEWAY

I lived in El Sereno almost my whole life. This freeway needs to be built already. It seems like a few people are holding up this project. We need to do what is for the good of the ENTIRE city of LA.
The country (and yes country as in USA) is wasting more time and gas because a few thousand people don't want this built. Isn't there like 15 million people in LA.

Jamie Ramirez
11924 Louise Ave Apt #4
Los Angeles, CA 90066

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Friday, April 08, 2011 12:12 AM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#46]

Name *	German Barrero
Email (you@email.com) *	alcancia@sbcglobal.net
Phone Number	(626) 840-9842
Address	170 Arlington Drive Pasadena, CA 91105 United States
Select a Subject *	Comment for scoping record

Comment *

I am very concerned about the air quality and the overall quality of life adjacent to the proposed 710 route. An above or below ground freeway would be hugely detrimental to the quality of life to all those within a few blocks of the proposed route. People like my 13 year old son, who has asthma, would be forced to curtail all outdoor activities due to the pollution and increased traffic. The noise level would be devastating to this one-time peaceful neighborhood.

We have three children and enjoy crossing the street to the Arlington Garden (btw-thank you for leasing the 3 acre lot to Pasadena). Currently, the mile stretch between California and Columbia (bordering South Pasadena) appears to be an abandoned stretch of road in and we do not feel safe near Pasadena Avenue with all the accidents that have occurred on this road. Because it is not cared

for, motorist constantly litter and speed down this corridor as though it was in an industrial area, and yet, it is a historic neighborhood with incredible history! No two homes are alike and many are jewels in the rough waiting to shine again. Please help us restore Pasadena Avenue to the quaint street that it was.

We would like to see the old street lights returned to Pasadena Avenue as well as the restored sidewalks on the east side of the street. We also need lighted crosswalks and slower traffic.

We believe that Pasadena Avenue is deserving of restoration and my wife, kids and I appeal to you for similar care to that of other historic neighborhoods. The crumbling asphalt sidewalks are too close to the 50 mile per hour traffic that races through the neighborhood.

I believe that Caltrans should explore connecting Del Mar to the start of the Pasadena Freeway 110. If below ground, it would be a short connection through a commercial corridor (Raymond & Arroyo) and would alleviate future damage to the historic neighborhoods.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Friday, April 08, 2011 9:26 AM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#47]

Name *	Trent Sanders
Email (you@email.com) *	trent@gonzowrite.com
Address	4727 Hampton Road La Canada, Calif 91011 United States

Select a Subject *	Comment for scoping record

Comment *

The completion / connection of the 710 through to the 210, whether above ground or via tunnel, will triple or even quadruple the number of big-rig trucks and cars through La Canada and La Crescenta.

La Canada and La Crescenta are residentail cities with homes abutting the 210 freeway. Already the noise of traffic, especially the truck traffic, has made living near the 210 freeway insufferable.

Interstate 5 on the other hand, is abutted by commercial properties, factories and the Los Angeles River where traffic noise doesn't impact homes and homeowner's living quality.

The connection of the 710 to the 210 should not be allowed.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Friday, April 08, 2011 12:45 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#48]

Name *	Robert Chang
Email (you@email.com) *	robertchang@gmail.com
Phone Number	(626) 528-1367
Address	204 S. Elm St.

	Alhambra, CA 91803 United States
Select a Subject *	Comment for scoping record

Comment *

The 710 extension should consider a tunnel option that moves the existing number of vehicles of through traffic along Fremont Avenue between Alhambra and Pasadena - and nothing more.

What should be studied in scoping is one or two tunnels with exactly two lanes in each direction, 12 foot clearance so that trucks can never use the tunnel (they are currently prohibited from using Fremont Avenue north of Alhambra Road), with congestion pricing that takes into account not just the number of vehicles in the tunnel itself, but also the conditions of the freeway at each end. The congestion pricing would not be capped, meaning that if a $50 toll was necessary to remove traffic, then a $50 toll would be charged. Equity concerns are irrelevant because this is a new roadway, not a replacement of an existing roadway. Drivers could continue to use Fremont, but traffic signals should be timed to favor east-west traffic at all intersections, and not north-south traffic, to encourage through drivers to use the tunnel or Fair Oaks/Atlantic.

Congestion pricing money beyond that required for maintenance of the tunnel should be used for neighborhood traffic improvements and be reinvested in the community along the corridor. Without trucks, most of the exhaust issues with residents in Alhambra/South Pasadena would be eliminated.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Friday, April 08, 2011 1:09 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#49]

Name *	Mary Smith

Email (you@email.com) *	marytexcal@gmail.com
Phone Number	(818) 790-1959
Address	4623 Grand Ave La Canada, CA 91011 United States
Select a Subject *	Comment for scoping record

Comment *

My husband and I live a half a block from the freeway, near the tunnel under Foothill. This tunnel is very close to the La Canada Elementary School and Memorial Park. The exhaust from the freeway is obnoxious, along with the noise. We cannot sit in our backyard or front without a lot of road noise from cars and especially trucks. The peace and quiet of living here for many years has disappeared. Trucks seem to honk their horns at night going into the tunnel with other vehicles responding. This is very annoying as it is very loud at night causing difficulty to sleep. The freeway is in bad shape with CalTRans repairing only the bad spots with cheap fixes. They then break up again and cause more cracks in the cement. I have called and suggested the rubberized coating to eliminate noise and make better repairs to the freeway, but got nowhere with the CalTrans people, supposedly due to "costs to repair". This is a major nightmare for our city and requires you to keep windows closed at all times, thereby using more energy to maintain good home temperatures. We can no longer keep windows open. We are almost 70 years old and are very concerned about the enviornmental impact on our health. Please consider other alternatives to this issue other than funneling more vehicles and trucks our way to make our city difficult and unhealthy to live in.

Mary Smith

Gary Smith, MD

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Friday, April 08, 2011 3:02 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#50]

Name *	Kathy Bergen
Email (you@email.com) *	bkbjmss@yahoo.com
Address	4953 Commonwealth Ave La Canada, CA 91011 United States
Select a Subject *	I have a suggestion

Comment *

Stop the 710 extension.

With the state of California almost bankrupt I find it hard to believe Caltrans/Metro is still attempting to spend billions on the 710 extension. How much is the "series of public meetings" costing? Does Caltrans actually think that the communities impacted the most will change their minds because of panels of suits and glossy charts.

Our current overburdened freeway system will collapse under the expected increase of truck traffic through our communities.

Californai attempts to lead the nation in environmental concerns yet the state is caving into the demands of special interest groups, i.e. union and towns not impacted by the extension ignoring the quality of life in the cities surrounding the 710 and the 210 freeways. It is always the same old story- Follow The Money. Shame!

From: Piane Marge [mailto:mpiane@aol.com]
Sent: Saturday, April 09, 2011 9:43 AM
To: SR710Conversations
Cc: Huizar Jose; Schpak Helene; George Brauckman
Subject: 710 connection

Marge Piane

9 April 2010

Mr. Ron Kosinski, Deputy District Director
Caltrans District 7
100 S. Main Street
Los Angeles, CA 90012

Re: 710 Freeway extension

Dear Mr. Kosinski:

I greatly appreciate the outreach Metro is conducting in neighborhoods that may be affected by an extension of the 710 Freeway.

I live in Classell Park, where the 2 Freeway meets the 5 Freeway. We are nowhere near the 710 Freeway, and a good distance from the 210.

Drivers who use the 710 to go to or from central Los Angeles, can already access the entire area by connecting to the 5 freeway; and a tunnel that would connect the 710 to the 2 freeway would virtually duplicate this existing connector route. Drivers who use the 710 to go to or from the eastern part of the city, or Pasadena and points along the 210 freeway—and do not currently use the 5 freeway connector--would not suddenly decide that heading away from their ultimate destination is a good idea; they will continue to use surface streets to get to the 210.

I appreciate that the people who live in Alhambra, Pasadena and South Pasadena don't want construction and/or freeway traffic in their neighborhoods; however, if the 710 is to be connected, it only makes sense to do it *directly* to the other "stub" that ends just south of the 210.

A "connecting" tunnel through Glassell Park might be the cheapest option, but it isn't an efficient or effective solution to the needs of commuters who use the 710.

I hope you will consider my comments when making your decision.

Thank you,

Marge Piane
Glassell Park resident since 1987

2267 Moss Av / Los Angeles, Ca 90065 / 323-255-5763 /mpiane@aol.com

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From: Rick Nathanson [mailto:ricknath777@gmail.com]
Sent: Saturday, April 09, 2011 10:27 AM
To: Ron_Kosinski@dot.ca.gov; SR710Conversations
Subject: 710 Freeway

Ron Kosinski, Deputy District Director
Sat 4/9/2011 10:27 AM
Division of Environmental Planning
Caltrans – District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

Dear Mr. Kosinski,

As a longtime resident of La Crescenta, my wife and I have seen many changes to our community, County and State. Some of them have been good changes and others of them not so good.

Sometimes we have worked hard to have changes made and been delighted when the changes went our way. Other times we have lost the debate and learned to live with the results of our defeat.

Now we are set upon a mission, the proposed change of which is on a greater scale than ever before. We who live here and along the corridor of the proposed 210 Freeway extension, the very residents who will be most greatly affected, cannot bear the burden of a decision not in our favor.

The rumbling noise of increased traffic, the acrid fragrance of the diesel exhaust, the additional volume of particulates, all of which show up at our doorstep 24 hours per day, can only multiply in their insidious way by allowing the 210 Freeway extension to proceed.

Increasing the flow of traffic and of “big rigs” in particular, through the East / West 210 Freeway corridor will seem like a death sentence to all of us who live here. Physically, mentally and financially this is the wrong idea for our schools along this route, our communities and our State and Federal budgets, as well.

I am shocked to learn that the communities of La Canada / Flintridge, La Crescenta, Tujunga and Sunland have not been included in the impact studies which have been occurring with regard to this proposed extension. If these communities are not included immediately, we will have no opportunity to fairly voice our concerns, and that is just not fair OR American.

It is my understanding that the proponents of this extension do not live here. We do, you and I. I trust in you to lead this in the right direction.

Please contact me if there is some way I can be of service to you or our mission to curtail this extension.

Sincerely,

Rick Nathanson
2849 Harmony Place
La Crescenta, CA 91214

* * * * * * * * * * * * * * * * * * * *
Rick **N**athanson
Mobile: +818 / 359-3092
Home: +818 / 957-1701
* * * * * * * * * * * * * * * * * * * *

From: mysuess@aol.com [mailto:mysuess@aol.com]
Sent: Saturday, April 09, 2011 1:20 PM
To: SR710Conversations
Subject: environmental study

Please note I am opposed to the 710 frwy connecting to the 210 frwy.
The environmental impact of this project is to extreme being it
will create more air pollution, noise pollution, foothill congestion.
I believe that environmental research on how this will impact
La Canada, LaCrescenta, Sunland and Tujunga has not been taken
into consideration and the voice of the residents in this area has not
been a concern or consideration.
Being a resident of this area since January 1962 I have seen and felt
the impact of pollution created just by having the 210 frwy being built
and going through these areas. I can see the 210 frwy from my home
and each year the congestion becomes more of a problem.
Please consider the impact on these communities.
Environmental studies are necessary.
Thank You,
Susan Carey
10839 Mountair Ave
Tujunga, CA 91042
Mysuess@aol.com

From: Stephanie Johnson [mailto:stephjohnson17@hotmail.com]
Sent: Monday, April 11, 2011 8:59 PM
To: SR710Conversations
Subject: 710 Gap Project - Scoping comments

Attached please find my comments for the 710 Gap Project environmental review scoping.
Stephanie Johnson

1920 Los Robles Avenue
San Marino. California 91108
626-441-8514
stephjohnson17@hotmail.com

Stephanie Johnson
1920 Los Robles Avenue
San Marino, California 91108
626-441-8614
stephjohnson17@hotmail.com

April 9, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main Street, MS16A
Los Angeles, California 90012

Re: **The 710 Gap Closure Project**
(PM 26.7/32.1, EA/Proj.ID: 187900/0700000191 710 Gap Closure)
Scoping for Environmental Impact Study

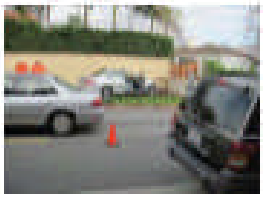
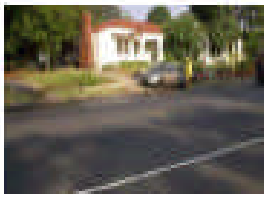
Thank you for the opportunity to comment on scope of the Environmental Impact Report for the 710 Gap Closure project. I have attended the *SR-710 Conversations* community meetings conducted by Caltrans and METRO.

Given the broad project definition, (*all possible transportation improvements - to relieve congestion and improve mobility*) my comments are limited to current conditions and the need for mitigation of existing and potential negative impacts to Los Robles Avenue in San Marino; the street where I live.

Los Robles Avenue in San Marino is a 7/8 of a mile narrow, two lane street fronted by single family homes where children live and play. The street runs from Huntington Drive, where Atlantic Boulevard terminates, to the City of San Marino's northern border at the intersection of Los Robles and Marengo avenues in Pasadena. The homes, built in the 1920s, are situated close to the street, since Los Robles has been widened from its original configuration. The posted speed limit is 30 mph. and commercial vehicles over three tons are prohibited. The City of San Marino General Plan, classifies Los Robles Avenue as a residential collector street. The street carries an unusually high volume of cut-through traffic, exceeding the capacity of a two lane residential street.

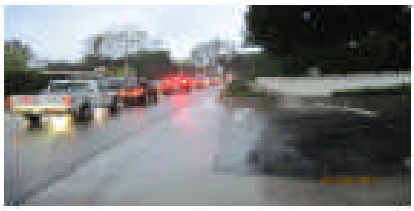
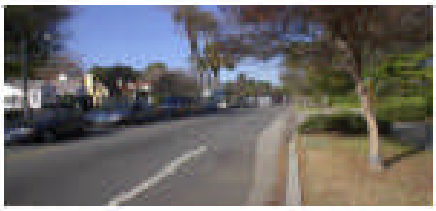
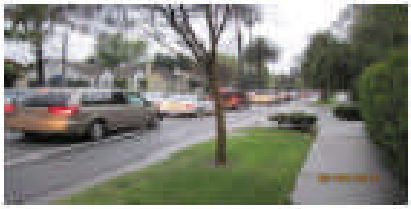
Sample photos of Los Robles Avenue, non-peak hours

Are these the types of accidents that typically occur on a residential street?

Sample photos of Los Robles – peak hours

Note: night photo – signal light is green, and traffic is still backed up.

According to project materials, the proposed Purpose and Need for the Project includes: "Reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips." Los Robles is one of those streets.

- Los Robles Avenue has been defined as a collector street with a design capacity of 10,400 ADT. The existing traffic volume approaches 18,000 ADT, which regularly exceeds the level of service "E" design conditions (13,000 ADT).
- Traffic congestion during commute hours is so bad that residents cannot back out of their driveway. The speed of traffic, especially during late night hours is excessive. There are many traffic accidents due to the high traffic volume.
- The EIR for the Alhambra *West Main Street Corridor Master Plan* project studied the signalized intersections in the city of Alhambra. The intersection adjacent to Los Robles Avenue is Atlantic & Huntington Drive. The level of service during commute time is rated "F".
- The existing noise level on Los Robles Avenue exceeds the city of San Marino guidelines. The residential area along Los Robles Avenue has been documented to be exposed to noise levels as high as 72 dB(A) by two independent studies, that place the existing residential use in the "normally unacceptable" category and clearly define it as impacted by traffic noise.
- Traffic generated air pollution and air quality, to my knowledge, has never been evaluated.
- Clearly, excessive traffic in a residential neighborhood presents numerous public safety issues and is a constant public nuisance.
- Many of the homes on Los Robles were built in the 1920s. They have historic value due to their age and several of the homes are considered to be architecturally significant.

Past projects in neighboring cities have negatively impacted our street, increasing traffic volume and exacerbating the noise, air pollution, and public safety problems. Projects now in progress have the potential to adversely impact Los Robles further.

- A prior city of Alhambra project closed three streets at Huntington Drive and diverted the traffic to Atlantic/Los Robles. The EIR for the *Almansor Street Traffic Diversion Project* (April 1993), indicates that traffic was deliberately shifted away from the nearby Alhambra residential area onto both Garfield and Atlantic boulevards. The EIR concludes that the traffic diversion would increase traffic on Los Robles Avenue, and it has.

- Subsequently, the city of Alhambra has approved the In-n-Out Burger establishment at Atlantic & Garfield, the cinema complex at Garfield & Main, and the West Main Street Corridor project, all of which generate cut-through traffic on Los Robles Avenue. Furthermore, the northbound Atlantic Boulevard lane striping has been changed since the In-n-Out project from one northbound to Los Robles, to two northbound lanes, allowing more traffic onto Los Robles.

- In 1998, $46 million in Federal Transportation Funds was secured to assist the cities of South Pasadena, Pasadena, and Los Angeles to alleviate traffic congestion. None of the work completed has included a study of the traffic impacts to Los Robles Avenue in San Marino.

- Growth in Pasadena from increased housing density, entertainment at Old Town, shopping at Paseo Colorado and Lake Avenue, and an increase in the number of businesses, have generated more traffic to western Pasadena. I am not aware of an environmental study of the impacts to Los Robles Avenue in San Marino completed for any project.

- South Pasadena is currently implementing improvements to the Fair Oaks corridor including traffic calming features and signal synchronization. Plans for traffic calming on Fremont Avenue have been approved, but not implemented. None of these projects have assessed the impact to Los Robles Avenue.

- The current traffic Signal Synchronization project underway by the County of Los Angeles includes the synchronization of traffic signals on Atlantic Boulevard to increase traffic flow. This project was declared categorically exempt from environmental review.

- An ATMS project is underway by the County of Los Angeles – San Gabriel Valley Traffic Signal Forum that designates Atlantic Boulevard a "priority corridor" (major traffic conduit). The stated purpose of the ATMS project is to increase traffic flow. This project was declared categorically exempt from environmental review.

For those of us who live on Los Robles Avenue in San Marino, a study of the environmental impacts of traffic is long overdue.

Since Los Robles Avenue has already been negatively impacted by excessive traffic, a plan to mitigate the negative impacts must be developed and implemented as part of a regional mobility plan. It is wrong to allow a residential street to decline into a cut-through "freeway".

I appreciate that the goal of Caltrans and METRO regional planning is to provide the best public transportation possible to the residents of Los Angeles County, while mitigating the adverse effects to the environment and the people who live here and trust that an environmental impacts study and report for our area will be forthcoming.

Sincerely,

Stephanie Johnson

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Sunday, April 10, 2011 9:24 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#51]

Name *	Ralph Moran
Email (you@email.com) *	ralphmoran@sbcglobal.net
Address	1183 Oneonta Drive Los Angeles, CA 90065 United States
Select a Subject *	Comment for scoping record
Comment *	I am a resident in Mount Washington which is a Los Angeles neighborhood and one of the proposed sites for the 710 extension. For the record my family opposes the 710 extension becuase of the environmental harm produced by car fumes and the effect on human health, specifically the health of my family and kids.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Sunday, April 10, 2011 11:20 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#52]

Name *	Alexandra Ellis
Email (you@email.com) *	dobbylehobbit@gmail.com

Address	Glendale, CA 91202 United States
Select a Subject *	Comment for scoping record
Comment *	Local communities, including Glendale, Pasadena, South Pasadena and the Crescenta Valley are officially opposed to a freeway or tunnel project, and advocate alternatives including multi-mode, light-rail, and alternative transit investments.

From: Mark Vallianatos [mailto:mvalli@oxy.edu]
Sent: Monday, April 11, 2011 12:29 PM
To: SR710Conversations
Subject: sr-710 scoping comments

Scoping comments on SR-710 'gap closure' project April 11, 2011

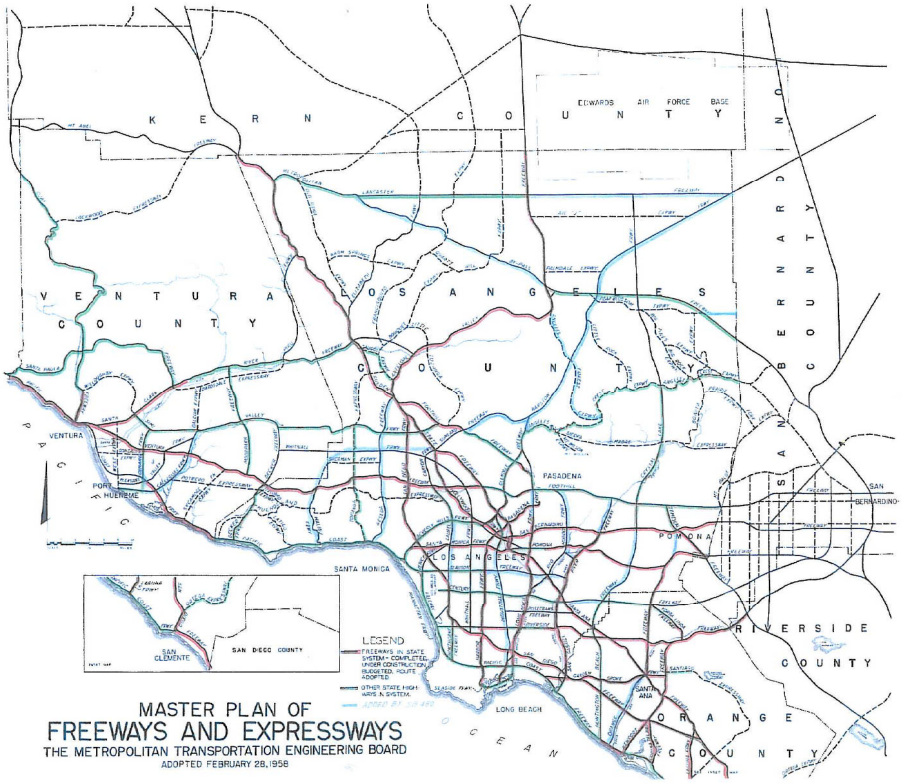
Urban & Environmental Policy Institute
Occidental College
1600 Campus Road MS M-1
Los Angeles, CA 90041
(contact: Mark Vallianatos, Policy Director, mvalli@oxy.edu)

The west San Gabriel Valley, Northeast Los Angeles, Pasadena, Glendale, and other cities and communities along the Arroyo Seco corridor are among the most diverse in California. The area has a rich cultural history and important natural and ecological sites. The opening of the Metro Gold Line has provided a new sense of connection between these communities and opportunities for transit-oriented development and more sustainable land use in the region.

The region is divided and surrounded by numerous freeways: the 710, 10, 210, 110, 134, 5, 2, 101, 60, and 605. These freeways bring deadly particulate pollution and noise. They promote car-centric land use and mobility, which have contributed to epidemics of obesity and diet-related illness. The construction of these freeways disrupted communities, especially low income communities of color.

Metro and Caltrans have a choice to make in investing billions of dollars to address mobility and congestion in this area. They can look to the past, to early-mid 20th century freeway plans, by extending SR-710 to the 210 via a surface or tunnel route. This backwards-looking approach (see 1958 map of the massive and thankfully never fully implemented freeway and expressway system), would further pollute and divide communities. These plans are from an era when the car was supposed to solve all mobility challenges. They are outdated relics from a period before scientists understood the health risks of

particulate pollution and the threat of climate change; and before planners and health officials fully understood that a freeway and car-based transportation system would lead to sprawl, sedentary lifestyles, and inefficient land use patterns.



Or the agencies can adopt 21st century transportation solutions to move people and products in a way that improves the environment and surrounding communities. In these scoping comments, we suggest four priority transportation improvements for the project area under review. We also urge the agencies to conduct Health Impact Assessments of the freeway option and alternatives to accompany environmental review.

1. Remove the SR-710 freeway between the 10 freeway and Valley blvd by transforming it into a surface street and/ or a linear park.
2. Expand transit to reduce car traffic and pollution and spur transit-oriented development
3. Create complete, living and green streets that promote safe walking and cycling and create vibrant public spaces.
4. Reduce freight truck traffic and pollution by expanding on dock rail at the Ports of Los Angeles and Long Beach.
5. Conduct a health impact assessment of all alternatives.

1. Remove the SR-710 freeway between the 10 freeway and Valley blvd by transforming it into a surface street and/ or a linear park.

Smart metropolitan regions are beginning to undue some of the damage done by the urban freeway

frenzy of the 1950s-1970s. Cities such as San Francisco, Soeul, Korea, and Portland have achieved gains in quality of life, economic development, and mobility by transforming sections of freeways into boulevards, open space, and parks. (http://www.preservenet.com/freeways/index.html ; http://www.cnu.org/highways ; http://www.grist.org/infrastructure/2011-04-04-seoul-korea-tears-down-an-urban-highway-life-goes-on ; http://www.infrastructurist.com/2009/08/04/7-urban-freeways-to-tear-down-today-and-what-tomorrow-might-look-like-if-we-do/ ; http://www.seattle.gov/transportation/docs/ump/06%20SEATTLE%20Case%20studies%20in%20urban%20freeway%20removal.pdf ; http://www.streetfilms.org/lessons-from-san-francisco/ ; http://www.streetfilms.org/mba-highway-removal/)

(Cheonggye stream in Seoul, formerly covered by a freeway. Image by flickr user elzed)

(Embarcadero before and after freeway removal. Flickr user vision63)

The approximately mile-long stub of SR-710 that extends north of the 10 freeway to Valley blvd is a promising candidate for removal and transformation.

- ⇒ Caltrans and Metro should decommission this section of SR-710 and transform it into a non-grade-separated, complete, living and green street as discussed above and/or into a park and open space.
- ⇒ The agencies should conduct a community planning exercise involving residents, municipalities, and California State University Los Angeles to determine how to best transform the removed section freeway. To limit exposure to freeway pollution, the lower 1500-2000 feet of the new boulevard/ park could be a buffer zone/ ecological remediation zone with more active uses in the northern two-thirds of the site.
- ⇒ The agencies should ensure that this closure does not worsen pollution in adjacent communities. This can be accomplished by increasing transit, reducing truck freight trips, and conducting a health impact assessment.

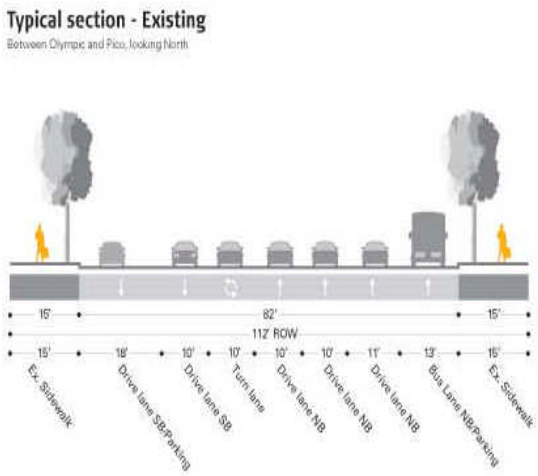
2. Expand transit to reduce car traffic and pollution and spur transit-oriented development

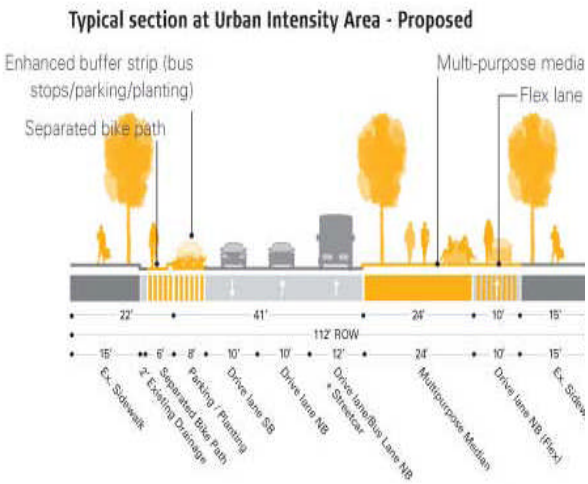
Rapidly expanding the transit network in the area under review is the best way to reduce passenger car traffic and improve denser, walkable land uses. There are significant gaps in transit in the area under review, especially north-south between the northern and southern sections of the San Gabriel Valley and between Northeast Los Angeles and Glendale and the San Fernando Valley. Glendale is in fact the most populous city in Los Angeles County without a light rail connection.

- ⇒ Extend metrorail northwest from one of the Pasadena Gold Line stations through Eagle Rock, Glendale and Burbank to the Burbank airport then south to connect to the terminus of the Red Line in North Hollywood. This would create a valuable northern loop between the Gold and Red lines that would expand links between the San Gabriel Valley and the San Fernando Valley and better connect the population and job centers of Glendale and Burbank to the region's light rail system.
- ⇒ Accelerate extending the Gold Line eastwards as planned in the Foothill extension and Eastside extension.
- ⇒ Create metrorail, metroliner or dedicated busway north-south corridors between the two arms of the Goldline. This could follow Atlantic and Huntington to connect the East L.A. civic center station to the planned Gold Line foothill extension station in Arcadia. As the foothill extension and eastside extensions of the Gold Line continues, Metro should consider further North-South Spurs every 3-5 miles similar to the East Valley north south corridors being studied in the San Fernando Valley. http://www.metro.net/projects_studies/north_sorth/images/ns_corridor_study.pdf These types of dedicated rail or bus routes would expand the transit grid and improve north south alternatives to car transportation.

3. Create complete, living, and green streets that promote safe walking and cycling and create vibrant public spaces.

Streets let people move between places. Streets are also important public space in themselves. Throughout much of the 20th century, traffic engineers designed wide streets with wide lanes and high speed limits in an effort to maximize the flow of cars per hour at peak traffic times. These design standards created streets that are dangerous to walk or bike on and near. Streets designed as 'sewers for cars' also harm the places they are supposed to connect by making it unpleasant to be outside due to the speed and noise and sterile visual environment of streets. Fortunately, some cities are reinventing streets for the 21st century. These streets are **complete** in that they dedicate space for all modes of transportation with wide sidewalks, bike lanes (including protected or separated bike lanes), bus only lanes, flex lanes, modern streetcars, etc. They are **living and vibrant** because they calm traffic, create more and safer pedestrian crossings, more public plazas and seating, and welcome walkers and bikers who bring life to sidewalks and streets and customers to local business. They are **green** because they are designed with more shade trees, less blacktop, and with landscaping and permeable surfaces to capture and filter rainwater. For example, the My Figueroa project examining street improvements for South Figueroa St. in Los Angeles is demonstrating best practices for 21st century streets.
http://myfigueroa.com/wp-content/uploads/2011/02/2011-02_Fig_Public-Meeting-Boards.pdf





The Los Angeles County Department of Public Health is funding development of a model streets manual that incorporates similar goals of living, safe, and complete streets. (http://la.streetsblog.org/2011/03/16/model-streets-manual-on-its-way-move-over-old-traffic-handbook/) The project area for the SR-710 'gap closure' project has a number of major streets that are too wide, unpleasant, and unsafe. These could greatly benefit from being made more complete, living,

and green.

- ⇒ As part of an alternative to freeway extension, Metro and Caltrans should launch planning efforts like the My Figueroa project for twelve streets and implement cutting edge improvements on these streets of the type that will be contained in the Los Angeles County funded street manual.
    - Huntington drive
    - Valley blvd
    - Mission blvd
    - Main st/ Las Tunas dr
    - Fremont ave
    - Atlantic blvd
    - Rosemead blvd
    - San Gabriel blvd
    - San Fernando Rd
    - Eagle Rock blvd
    - Colorado Blvd
    - Figueroa St
- ⇒ Metro should work with municipalities and the County to ensure that a network of bike lanes, protected bike lanes, bike paths and bike infrastructure is rapidly implemented in the project area, with a goal of increasing cycling's mode share of trips to at least 10 percent. Bike lane projects promote clean, healthy transportation and also create more jobs per dollar invested than road projects. (http://www.bikeleague.org/resources/reports/pdfs/baltimore_Dec20.pdf ; http://issuu.com/bikeleague/docs/economic_benefits_bicycle_infrastructure_report)

4. Reduce freight truck traffic and pollution by expanding on dock rail at the Ports of Los Angeles and Long Beach.

One of the perceived needs for extension of SR-710 is high levels of truck traffic on the existing route and expectations of continuing increases in freight imports and truck traffic. The solution to this challenge isn't expanding or extending freeways. It is reducing truck traffic by shifting freight movement to less polluting modes of goods movement and reassessing the desirability of endless growth in the logistics industry. A recent report by the U.S. Government Accountability Office found that externalities from truck freight transport were approximately six times more per unit carried than for freight rail. "According to our synthesis of EPA's latest national emissions inventory data (2002), freight trucks produced over six times more fine particulate matter and over four times more nitrogen oxide on a ton-mile basis than freight locomotives, and over 10 and six times more of each type of emission, respectively, on a ton-mile basis than inland waterway vessels. And, according to our analysis of EPA data on greenhouse gases, trucks emitted the highest levels of greenhouse gas (CO2 equivalents) among the freight modes—about eight times more per unit of freight than freight rail, and thirteen times more than waterways freight." (GAO. SURFACE FREIGHT TRANSPORTATION: A Comparison of the Costs of Road, Rail, and Waterways Freight Shipments That Are Not Passed on to Consumers. January, 2011. http://www.gao.gov/new.items/d11134.pdf)

- ⇒ Caltrans and Metro should work with the Ports of Los Angeles and Long Beach to expand capacity for on-dock rail so that imports can be loaded directly onto freight trains, reducing the need for trucks to transport containers to warehouses, inland rail yards, and transloading

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VAL MARQUEZ
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JOHN CARBAJAL
CO-CHAIR

JOE MANZANO
STAKEHOLDER

Ms. Smith (cong equity)
cc: L. Boyle
4/11/11

April 7, 2011

Received
APR 11 2011
Highway Programs

Doug Failing
Executive Director, Highway Programs
Metro
One Gateway Plaza
Los Angeles, CA 90012-2952

RE: Interstate Freeway 710 Expansion Project
Request for Metro Action

Dear Mr. Failing:

Thank you for the opportunity to allow the LA32 Neighborhood Council to provide you with our concern regarding the State Route 710 North Extension Project ("Gap Closure").

The LA32 NC Land Use and Development committee, residents and stakeholders were asked to participate in the Caltrans and METRO Environmental Impact discussions (SR710 Conversations) held at the Presbyterian Church on Eastern on Feb. 24, March 17, and March 29, 2011. Our committee is deeply concerned about the poor outreach, lack of information provided on meeting notices, community participation, and information offered by Caltrans and METRO representatives.

As you know, the community of El Sereno is primarily a working class and Latino neighborhood that suffers from many of the socio-economic inequalities affecting minority communities in Los Angeles. In fact, the U.S. Census data indicates that nearly 50% of adult residents suffer from limited language skills. Therefore, multi-jurisdictional public development projects, such as the SR-710 extension, need to ensure the provision of common language information in marketing and presentation material.

Meeting notices lack meaningful information as to the items that will be discussed and utilize acronyms that most stakeholders are unable to decipher, such as NEPA and CEQA. Language access is important for meaningful community participation and community planning and development decisions. Furthermore, discussion moderators were unsuccessful in providing a laymen's interpretation of each meeting's subject matter, community impact and key decision points for the above referenced project.

For example, at the February 24th meeting, someone posed the following question to the audience: What is scoping? Due to a lack of language access, no one from the audience replied with an answer. The meeting quickly spun out of control into a discussion of the intended meeting goals without addressing any actual goal.

April 7, 2011

Furthermore, discussion moderators were unable to outline the project emphasis that was undergoing Environmental Impact Statement. Are Caltrans and METRO proposing an above ground or tunnel expansion?

Lastly, Caltrans and METRO are placing an over-abundant emphasis on the San Gabriel Valley residents and nearly disregarding meaningful outreach to City of Los Angeles stakeholders. (Although participation at the March 29th meeting saw an increase in community attendance, due in part to the distribution of flyers by some concerned neighbors to affected area residents both in Los Angeles and Alhambra.) San Gabriel Valley, who would be impacted by only half of the proposed zones, and with only 20% of the county's population, has been provided with four of six meetings in each series, including two meetings that were "off-the-record," and one recorded as part of official CEQA process. As a comparison, the City of Los Angeles would be impacted also by three zones and maintains 40% of the county population, but has been extended only one meeting in each series. The fifth set of meetings was extended to stakeholders of the City of Glendale even though they are not directly impacted by any alternative of the project study area.

The leadership failings of Caltrans and METRO representatives have rekindled historic sentiments of community mistrust. The community and residents of El Sereno are grateful that you supported our effort to place the tunnel portal south of Valley Boulevard. As our elected representative on the METRO Board, we ask you to again look into these egregious errors in the community outreach process. The LA32 NC and the community of El Sereno seek your assistance again to improve stakeholder engagement in the community planning and decision making process of the SR-710 North Extension project. The goal of your action should be to:

- Increase and improve the number of official community meetings to address Environmental Impact issues per zone of impact
- Improve language accessibility for meeting notices and presentations
- Enhance Caltrans and METRO affinity relationships with community organizational trusted advisors to ensure sufficient community participation

We look forward to working with you in a productive manner to rectify the above referenced issue.

Sincerely,

Val Marquez
Co-Chair
Land Use and Development Committee
LA32 Neighborhood Council

Johnny Carbajal
Co-Chair
Land Use and Development Committee
LA32 Neighborhood Council

cc: Hon. Gilbert Cedillo, Assembly District 45
Hon. Ed Hernandez, Senate District 24
Hon. Kevin De Leon, Senate District
Hon. Judy Chu, Ph.D., Congresswoman, District 32
Hon. Eric Garcetti, LA Councilmember, CD 13
Gloria Molina, 1st District, Supervisor, LA County
Michael Miles, District 7 Director, Caltrans
Hon. Jose Huizar, LA Councilmember, CD 14
Hon. Xavier Becerra, Congressman, District 31
Hon. Ed Reyes, LA Councilmember, CD 1
Hon. Mike Eng, Assembly District 49

facilities.

- ⇒ Caltrans and Metro should work with the ports to set a target and plan for reduced truck traffic on SR-710.
- ⇒ The agencies should work with the ports, railroad companies and regulators to accelerate adoption of electrified and cleaner locomotive technologies and to ensure that increased train facilities and trips do not increase negative health impacts.

5. Conduct a health impact assessment of all alternatives.

Freeways are sources of dangerous air pollution, especially from diesel exhaust. Children living near freeways face higher risks of asthma, worse asthma, and reduced lung growth. (McConnell, R, T Islam, K Shankardass, M Jerrett, F Lurmann, J Gauderman, E Avol, N Kuenzli, L Yao, J Peters and K Berhane. 2010. Childhood incident asthma and traffic-related air pollution at home and school. Environmental Health Perspectives http://dx.doi.org/10.1289/ehp.0901232; McConnell, R., et al. (2006). "Traffic, Susceptibility, and Childhood Asthma." Environ Health Perspect 114(5): 766–772; Gauderman, W. J., E. Avol, et al. (2005). "Childhood asthma and exposure to traffic and nitrogen dioxide." Epidemiology 16(6): 737-43; Gauderman, W.J. et al. (2007) "Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study." Lancet 369(9561):571-7.) Exposure to traffic-related air pollution is also associated with higher rates of heart disease and cancer in adults. (Kramer et al. 2010. Traffic-related air pollution and incident type 2 diabetes: Results from the SALIA cohort study. Environmental Health Perspectives http://dx.doi.org/10.1289/ehp.0901689; Beelen, et al. "Long-Term Exposure to Traffic-Related Air Pollution and Lung Cancer Risk." Epidemiology 19 (5): 702-710 (2008); Kan et al, "Traffic exposure and lung function in adults: the Atherosclerosis Risk in Communities study." Thorax 2007 62: 873-879 (2007).

- ⇒ In addition to EIR/EIS, Caltrans and Metro should conduct a health impact assessment of all project alternatives, including the surface freeway, tunnel and other alternatives.
- ⇒ The agencies should learn from the ongoing Health Impact Assessment of the SR-710 expansion project being performed by Human Impact Partners and ICF International with input from Los Angeles County Department of Public Health. (http://healthimpactassessment.blogspot.com/2010/08/hia-update-from-human-impact-partners.html; http://eycej.org/sites/default/files/PB_HIA%20&%20710_v2.pdf http://www.metro.net/projects_studies/I710/images/Health-Impact-Assessment-Presented-to-Project-Committee-October-2009.pdf)

From: Brian Ellis [mailto:brian91202@gmail.com]
Sent: Monday, April 11, 2011 10:33 PM
To: SR710Conversations
Subject: 710 Link

Hi, As a resident of N. W. Glendale, I am in favor of completing the 710 connection to the 210 Freeway.

This will relieve some of the truck traffic along the I5 corridor and make our life easier. This is a bottleneck that has been around for years and I have always wondered why it hasn't yet been fixed.

Please add me to your email list.

Sincerely,

Brian Ellis
1324 Norton Ave
Glendale, CA 91202

818-206-0144

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, April 12, 2011 11:53 AM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#54]

Name *	Nancy Ward
Email (you@email.com) *	nancy@nancylynnward.com
Phone Number	(626) 239-6235
Address	539 Parker Ave. ca Monrovia United States
Select a Subject *	Comment for scoping record
Comment *	I am strongly opposed to closing the gap between the 710 and 210 freeways. We don't need it, an we don't need to disturb the communities in the pathway.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Tuesday, April 12, 2011 12:20 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#55]

Name *	Kimberly Gauthier
Email (you@email.com) *	kpginla@gmail.com
Address	South Pasadena United States
Select a Subject *	Comment for scoping record
Comment *	I am very opposed to the idea of hooking up the 710 to the 210. The traffic in our area already makes going anywhere, and not just during rush hour, barely tolerable.

From: Robbyn Battles CV Town Council [mailto:robbyn@thecvcouncil.com]
Sent: Tuesday, April 12, 2011 1:08 PM
To: SR710Conversations
Subject: 710 Scoping comments

To whom it may concern,

Attached are previous correspondences submitted from the CV Town Council in addition to the current Councils position in an attached letter dated April 09, 2011.

Hard copies have been mailed in care of Ronald Kosinski.

Robbyn Battles
Corresponding Secretary
E: robbyn@thecvcouncil.com

Crescenta Valley Town Council
PO Box 8676 | La Crescenta, CA 91214 | USA
P: 818 248 9387 | www.thecvcouncil.com

CRESCENTA VALLEY TOWN COUNCIL

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Robbyn Battles
Corresponding Secretary

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Dr. Young Suh

Harry Leon

Charles Beatty, alternate

Odalis Suarez, alternate

Charly Shelton, alternate

April 09, 2011

Ronald Kosinski,
Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main St., MS 16A
Los Angeles, CA 90012

Re: 710 Gap Closure

The Crescenta Valley Town Council has previously submitted its position on the proposed 710 tunnel in letters dated June 11, 2009, March 10, 2010, and December 7, 2010. (A copy of each is enclosed.) The Council's position is the same - the Crescenta Valley Town Council remains strongly opposed to a proposal to close the gap and connect the 710 Freeway to the 210 Freeway by way of an underground tunnel. We support an alternative plan which would alleviate traffic congestion by the use of rail. The proposed tunnel connection will increase the traffic congestion on the already overburdened 210 freeway to the east and west.

On the other hand, the proposed rail alternative will be consistent with agency project goals of alleviating traffic congestion on the north and south arteries and local surface streets, improving regional travel time, reducing greenhouse gas emissions from mobile sources such as semi trucks, and will minimize the impact on local communities.

Additionally, we request that the La Crescenta/Montrose Area be provided with information regarding the scheduling of any future public meetings including scoping meetings, EIR/EIS review or public comment meetings, and other project meetings, in sufficient time so that the community's voice and response can be heard and made part of the record. We also request that the effect on the La Crescenta/Montrose area be included in the EIR/EIS study. We also request that our position and above comments be made part of the official record.

Respectfully,

Cheryl Davis
President
Enc: Letters dated 06/2009, 03/2010, 12/2010

P.O. Box 8676 La Crescenta, CA 91224-0676 p:818-248-9387 e:contact@thecvcouncil.com www.thecvcouncil.com

Crescenta Valley Town Council

www.crescentavalleytowncouncil.org
P.O. Box 8676
La Crescenta, CA 91224-0676
(818) 248-9387

We support the alternate plan, proposed by Supervisor Michael Antonovich more than ten years ago, which would move containers from LA Ports to an inland site in Lancaster via rail. This would alleviate traffic congestion from many parts of Los Angeles as well as our community.

Sincerely,

Steve Pierce
President

CC:
NEIGHBORING COUNCILS:
City of Glendale
City of La Canada-Flintridge
City of Los Angeles – Neighborhood Council
-Wendy Gruel, Councilwoman

COUNTY OFFICIAL:
Michael Antonovich, Los Angeles County Supervisor

STATE OFFICIALS:
Arnold Schwarzenegger, Governor
Bob Huff, Senator
Carol Liu, Senator
George Runner, Senator
Anthony Adams, Assemblyman
Cameron Smyth, Assemblyman
Paul Krekorian, Assemblyman

FEDERAL OFFICIALS:
Barbara Boxer, Senator
Dianne Feinstein, Senator
Adam Schiff, Congressman
David Dreier, Congressman

Crescenta Valley Town Council

Fax

To:	State of California Department of Transportation		
From:	**Crescenta Valley Town Council**		
Fax:	(323) 222-9710	**Email:**	**contact@thecvcouncil.com**
Phone:		**Phone:**	**818-249-9387**
Date:	3/10/2010 1:01 PM	**Pages:**	**4**
Subject:	**Community Comments SR-710 Tunnel Technical Study**		

Notes:
Please add to the report

Crescenta Valley Town Council

www.crescentavalleytowncouncil.org
P.O. Box 8676
La Crescenta, CA 91224-0676
(818) 248-9387
contact@thecvcouncil.com

Cheryl Davis
President

Steve Goldsworthy
Vice President

Danette Erickson
Recording Secretary

Dennis van Bremen
Treasurer

Robbyn Battles
Corresponding Secretary

COUNCIL MEMBERS

Frank Beyt

Robert Thomas

Todd Thornbury

Kim Mattersteig

Charles Beatty, alternate

Silvana Casalegno, alternate

Kevin Kroeker, alternate

March 10, 2010

State of California Department of Transportation
3412 North Eastern Avenue
Los Angeles, CA 90032

Re: SR-710 Tunnel Technical Study, 2010 Community Meetings

Dear Sirs,

The Crescenta Valley Town Council is resubmitting a correspondence submitted in June 2009 with regard to 710 Tunnel project.

Please include this correspondence and the attached as part of the final geotechnical report.

Respectfully,

Cheryl Davis
President

enc: Letter dated June 11, 2009
2 pages

Crescenta Valley Town Council

www.crescentavalleytowncouncil.org
P.O. Box 8676
La Crescenta, CA 91224-0676
(818) 248-9387

Steve Pierce
President

Frank Beyt
Vice President

Cheryl Davis
Recording Secretary

Dennis van Bremen
Treasurer

Liz Arnold
Corresponding Secretary

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Danette Erickson

Steve Goldsworthy

Robert Thomas

Charles Beatty, alternate

Robbyn Battles, alternate

Joyce Lauterback, alternate

June 11, 2009

California Department of Transportation
District 7
100 S. Main Street
Los Angeles, CA 90012

Dear Sirs,

The Crescenta Valley Town Council is strongly opposed to the 710 Tunnel Project and the technical study which is underway.

While the first letter, sent May 17, 2007, has not had a response, let us be clear in this correspondence. As elected representatives of the unincorporated area in La Crescenta, we have recently held a public meeting in which there was strong opposition to the 710 Tunnel Project. We request that our opposition be acknowledged and filed along with other Foothill Communities.

It is estimated by experts that the 210 freeway thru the Crescenta Valley would bear the brunt of the traffic and congestion resulting from the completion of the 710 tunnel. This is not acceptable to us and we cannot see any type of mitigation that would ease this unequal burden that our community is asked to bear. Congestion, noise, and pollution from the additional traffic is unacceptable to our community.

Additionally, we are strongly opposed to the study in progress. Studying five zones, at an approximate cost of $10 million, is wasteful and irresponsible, with funds that could be better used elsewhere in our state, especially during this time of budget crisis. More consideration should be given to the way taxpayer money is spent and the way taxpayer concerns are addressed. It appears that this project has been decided upon and the "study" is merely a way to waste our money on a project not supported by a majority of municipalities.

Crescenta Valley Town Council

www.crescentavalleytowncouncil.org
P.O. Box 8676
La Crescenta, CA 91224-0676
(818) 248-9387

We support the alternate plan, proposed by Supervisor Michael Antonovich more than ten years ago, which would move containers from LA Ports to an inland site in Lancaster via rail. This would alleviate traffic congestion from many parts of Los Angeles as well as our community.

Sincerely,

Steve Pierce
President

CC:
NEIGHBORING COUNCILS:
City of Glendale
City of La Canada-Flintridge
City of Los Angeles – Neighborhood Council
-Wendy Gruel, Councilwoman

COUNTY OFFICIAL:
Michael Antonovich, Los Angeles County Supervisor

STATE OFFICIALS:
Arnold Schwarzenegger, Governor
Bob Huff, Senator
Carol Liu, Senator
George Runner, Senator
Anthony Adams, Assemblyman
Cameron Smyth, Assemblyman
Paul Krekorian, Assemblyman

FEDERAL OFFICIALS:
Barbara Boxer, Senator
Dianne Feinstein, Senator
Adam Schiff, Congressman
David Dreier, Congressman

Crescenta Valley Town Council

Cheryl Davis
President

Steve Goldsworthy
Vice President

Danette Erickson
Recording Secretary

Dennis van Bremen
Treasurer

Robbyn Battles
Corresponding Secretary

COUNCIL MEMBERS

Frank Beyt

Robert Thomas

Todd Thornbury

Kim Mattersteig

Charles Beatty, alternate

Silvana Casalegno, alternate

Kevin Kroeker, alternate

December 07, 2010

MTA Board of Directors
One Gateway Plaza
Los Angeles, CA 90012

Re: SR-710 Tunnel and the Crescenta Valley

Dear Sirs,

The Crescenta Valley Town Council is resubmitting an original correspondence drafted in June 2009 along with the current Council's re-approved correspondence dated May 20, 2010 with regard to the 710 tunnel project.

Please include these correspondences as part of your decision making process when the item on your December 9, 2010 agenda is voted upon.

Respectfully,

Cheryl Davis
President

cc:
Don Knabe
Antonio R. Villaraigosa, LA Mayor
Michael D. Antonovich, LA County Supervisor
Diane DuBois, City Council Member
John Fasana, City Council Member
José Huizar, City Council Member
Richard Katz
Gloria Molina, LA County Supervisor
Ara Najarian, Glendale Mayor
Pam O'Connor, City Council Member
Mark Ridley-Thomas, LA County Supervisor
Rita Robinson
Zev Yaroslavsky, LA County Supervisor

Enc: Correspondence dated June 11, 2009 2 pages
Correspondence dated May 20, 2010 2 pages

P.O. Box 8676 La Crescenta, CA 91224-0676 p:818-248-9387 e:contact@thecvcouncil.com www.thecvcouncil.com

From: James Price [mailto:pingomingo@hotmail.com]
Sent: Tuesday, April 12, 2011 6:20 PM
To: SR710Conversations
Subject: 710 Extension

Sir/Madam,

Nothing has been offered that can be seen as a legitimate reason for postponing the completion of the 710 Freeway.

For the sake of the people of Alhambra, South Pasadena, Pasadena, and other affected communities, I would urge the powers that be to resume construction of the 710/210 connection. This project has been held up, for no good reason, for quite a long time. Detractors have found no legitimate potential for detrimental impact. Noise? We all must put up with noise in the 21st Century. We need this freeway connection.

Jim Price
Pasadena

From: adina catalanotti [mailto:adinacatalanotti@yahoo.com]
Sent: Tuesday, April 12, 2011 8:21 PM
To: SR710Conversations
Cc: kevin chastain; thechefknows@yahoo.com
Subject: NO TUNNEL

RYFKM?

PLEASE DON'T LET THIS HAPPEN!!!!! DO NOT APPROVE THE TUNNEL PROJECT IT WILL RUIN THE LIFE THAT WE DESERVE AND THE HEALTH OF OUR FAMILIES AND FRIENDS IN THE COMMUNITY

IF YOU WOULD LIKE TO SPEAK WITH ME IN PERSON, MY NAME IS ADINA CATALANOTTI AND I AM BLESSED TO LIVE IN BEAUTIFUL SOUTH PASADENA. I WORK AT THE LANGHAM HUNTINGTON PASADENA HOTEL AS A CLUB CONCIERGE, MY HUSBAND GREG NAPIER IS A RESATAURANTEUR AND HE RUNS THE ROXOLANA RESTAURANT AND WINE BAR IN OLD PASADENA

ADINA 818 3879 0380 LANGHAM # IS 626 585 6203
GREG AT ROXOLANA 626 792 0440

WE ARE VERY ACTIVE IN THE CULTURE AND BUSINESS OF SOUTH PASADENA AND PASADENA

DONT DESTROY OUR LOVELY CITY AND LIFESTYLE FOR GREED AND SELFISHNESS

GOD BLESS

ADINA

From: Steve Tsai [mailto:stevectsai@yahoo.com]
Sent: Tuesday, April 12, 2011 10:19 PM
To: SR710Conversations
Subject: sr710

To:

Mr. Ron Kosinski, Deputy District Director Division of Environmental Planning Caltrans, District 7 100 S. Main Street, MS16A Los Angeles, California 90012

I want to thank you first for the opportunity to comment.

With this email, I hereby express my absolute full support of the Scoping letter dated April 9, 2011 sent by Stephanie Johnson, Los Robles Avenue, San Marino, CA 91108. Please address the issues in your EIR / EIS and mitigate the negative impact on Los Robles Ave. in the interest of our neighborhood.

best regards,

Steve Tsai
626-922-4560
stevectsai@yahoo.com
475 La Mirada Ave. San Marino, CA 91108

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 9:46 AM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#56]

Name *	ODALIS SUAREZ
Email (you@email.com) *	odyatlaw@aol.com
Phone Number	(818) 240-3411
Address	144 N. Glendale Ave., #206 Glendale, CA 91206 United States
Select a Subject *	Comment for scoping record

Comment *

Odalis C. Suarez

144 N. Glendale Ave., Suite 206

Glendale, CA 91206

(818)240-3411

email: odyatlaw@aol.com

Request that the following comments be made part of the record for the proposed 710 Gap Closure.

1. SCOPING

A scoping meeting should provide interested parties with the opportunity to comment on a proposed project and proposed alternatives. However, the present scoping meetings presented by the lead agency were so vague and ambiguous that no one can identify what the proposed project is. Without straightforward identification of the project and alternatives it is impossible to provide adequate comprehensive comments. Without a straightforward presentation of the proposed project the community is completely in the dark as to what are the potential studies that would be necessary to the affected areas. Without a straightforward identification of the project the comment period is so broad and undescriptive that it is an injustice to the CEQA process.

The scoping meetings were scheduled throughout the affected area, however, it was not until the last minute that the lead agency agreed to have a public meeting in the La Canada/La Crescenta area. In light of the extensive affects on traffic and pollution in these areas, more time and opportunity to comment should have been provided.

The scoping meetings were all scheduled at the 6:00 p.m hour where most people are either barely getting home or barely having dinner. Any scoping meeting for proper response and community input should be scheduled at 7:30 p.m.

The lead agency made no effort to advertise or publish the scoping meeting for the affected area. A last minute notification was all that was provided to the affected areas.

There was absolutely no presentation by the lead agency. The extensive amounts of money that was expended on the scoping meeting does not reflect the minimal presentation made by the agency at each meeting. Numerous agency representatives walked around the meeting and were present at the meetings, however, they provided no input, presentation or information.

The process should be renewed with a proper scoping process identifying the project, proposed alternatives and major impacts. Additionally, the scoping session should consider all of the affected areas not just the immediate areas of construction. The 210 corridor up through the

5 and 14 freeway will be severely impacted and should be included in the study area. Additionally the 210 east beyond Altadena and up to at lease the 605 freeway should also be made part of the project area as major arteries of the 710 and the transportation of goods. Without a proper scoping of the project the process is flawed.

2. ALTERNATIVES

The EIR should provide a rail alternative to transport all merchandise and goods to a hub in a less congested area where goods can be distributed by truck to other locations.

3. CONSIDERATIONS IN THE PROPOSED PROJECT AND ALL ALTERNATIVES

All proposals should extensively study, analyze and provide detailed statistics of the following:

A. Construction Impacts

The project and alternatives should have a detailed study of the construction period for the project. How long will the construction last, how will the construction affect traffic, traffic congestion, how will the construction period affect the aesthetics of the area, how will affect air pollution, how will it affect noise pollution, and all mitigation measures for the affects during the construction period must also be studied and included.

B. Historical and Aesthetic Concerns

The project and alternatives must also study and consider the following areas and mitigation measures for any affects: Aesthetics , air pollution, noise pollution, traffic congestion, affect on historical significance, affects on protected trees, historical structures, or potentially archeological and paleontological findings.

`

Although the South Pasadena and Pasadena Area are affected by the removal of structures and the building of structures, the EIR should provide an in depth study as to the historical affects of the area. Pasadena and South Pasadena are not merely local areas that protect historical interest, the entire region enjoys and benefits for the historical preservation of Pasadena and

South Pasadena. The EIR should also look into the affects of impacting a historically significant area in light on regional historical areas and the existence or non existence of similar areas.

C. Traffic

Traffic studies should be made during different periods of time during the day and on different days and in all affected areas. The studies should provide data and statistics during peak times of traffic and how the peak traffic times will be affected by any GAO closure locally as well as regionally.

Traffic studies should not only include traffic on the main freeways but also must include spill out traffic to neighborhoods along the 210 freeway and the 134 freeway. Further study should be made regarding the use of local neighborhoods as pit stops or rest stops and the use of local neighborhoods by truck transportation. Can these neighborhoods support the increased traffic and use of their public roads? The traffic studies should also include mitigation measures to prevent the use of local communities and the foothill as alternative routes for excess traffic or truck traffic.

All traffic studies should consider the increase in traffic collisions and deaths along the 210 freeway from semi incidents including statistics and data to support such findings. The traffic studies should also include mitigation measures to prevent the use of local communities and the foothill as alternative routes for excess traffic or truck traffic.

In light of the additionally vehicle traffic and truck traffic in the proposed project area and in the affected traffic area, the EIR should review all freeway connection ramps and how these structures will be affected by increase traffic and especially increase traffic use. In particular the connections from and to the 2 freeway and onto the 134 and 210 freeway east. Will these connections be affect, will additional traffic congestion devices need to be implemented, and will the structures withstand the extensive use by semi trucks.

Traffic studies should also include potential safety concerns throughout the 210 corridor and hillside areas. These areas facilitate the possibility of run away trucks and potential high speeds of trucks that could result in deadly accidents. What safety measures will be implemented on the 210 corridor?

The traffic studies should also include studies as to over night parking or pit stops along

the 210 and 134 freeway for trucks and how this will affect the local communities.

Even if the proposed project does not consider a toll road for the gap closure, a toll must be studied and the impacts addressed since it is a potential and possible future use of the proposed project in light of the heavy truck use of the 710.

The EIR should also study the impact on local law enforcement agencies such as CHP,, Sheriffs and local police agencies as a result of the increase in local traffic, increase in freeway traffic, and increase in community exposure to transient criminal activity.

D. Health Impacts

The EIR must have a significant study on the effects of increase traffic and increase truck traffic along the 210 corridor especially in the areas of La Crescenta, La Canada, Tujunga, and Sunland. The studies should specifically include the exposure of high levels of toxins by school students who attend schools and play in parks within 1000 feet of the 210 corridor. The potential for increased asthma, increased severity of asthma, other respiratory disorders and the affects of the inability of students to participate in physical activity as a result of the increased pollution limiting sports and athletic events.

The EIR must also study the significant impacts on the elderly in homes and assisted living locations that are also near or adjacent to the 210 and 134 corridor.

Finally, the study should also consider the affects on air quality to hospitals within the area of the proposed project and the affected areas such as the Huntington Hospital and Verdugo Hills Hospital. The study regarding the hospitals should not merely include air quality but also response time as to emergency vehicles and emergency services in these areas that are already overwhelmed with traffic and traffic lights.

In light of the additionally vehicle traffic and truck traffic in the proposed project area and in the affected traffic area, the EIR should review all freeway connection ramps and how these structures will be affected by increase traffic and especially increase traffic use. In particular the connections from and to the 2 freeway and onto the 134 and 210 freeway east. Will these connections be affect, will additional traffic congestion devices need to be implemented, and will the structures withstand the extensive use by semi trucks.

Traffic studies should also include potential safety concerns throughout the 210 corridor and hillside areas. These areas facilitate the possibility of run away trucks and potential high speeds of trucks that could result in deadly accidents. What safety measures will be implemented on the 210 corridor?

The traffic studies should also include studies as to over night parking or pit stops along the 210 and 134 freeway for trucks and how this will affect the local communities.

Even if the proposed project does not consider a toll road for the gap closure, a toll must be studied and the impacts addressed since it is a potential and possible future use of the proposed project in light of the heavy truck use of the 710.

The EIR should also study the impact on local law enforcement agencies such as CHP,, Sheriffs and local police agencies as a result of the increase in local traffic, increase in freeway traffic, and increase in community exposure to transient criminal activity.

D. Noise

Studies must be conducted regarding the noise levels that will affect the residents, business, schools, hospitals, and other facilities along the 210 and 134 corridor. Studies must be conducted during different time periods of the day and during different days of the week. The studies should not only include the flat areas along the corridor but also include the increased noise levels that resonate between the hillsides along the 210 corridor. Flat land noise is different from hillside noise and the studies should reflect both.

Studies must be conducted regarding light pollution as to the increased lights in night traffic and the glare of headlights including the new generation of vehicle head lights including the new LED lights. Additional studies and mitigation must be considered in the EIR for impacts from daytime glare of sun light and the increase vehicle traffic.

If sound walls are being proposed as a mitigation measure, the proposed project must identify all sound walls, how the sound walls will diminish the noise and light pollution, and what impacts will the installation of sound walls have on neighboring properties.

4. EIR PROCESS

A. AREAS OF STUDY

The scoping meetings identify the project area in the San Gabriel Valley and specifically exclude La Canada, La Crescenta, Tujunga, Sunland and other communities along the 210 west. The EIR PROCESS must consider these areas as areas impacted by the proposed gap closure and study these areas with the same intensity and detail as all other areas. Additionally, the study areas should study the impacts along the 210 east up to at least the 605 freeway.
The process should include all areas as one and not merely as segments of the proposed project. The study should proceed to analyze the individual affected community and study the region as a whole.

B. STUDY

The EIR should provide visual simulations of the proposed project and alternatives. The simulations should be computerized as well as three dimensional and presented to the community with sufficient time to be able to review and comment on the same.
The EIR must identify all pending and potential major projects along the 210 and 134 and the affects of the proposed project in relation to any pending major projects.

D. COST AND RELATED ISSUES

The EIR should show a detailed analysis of the cost of the proposed protect, the costs to any affected agencies and local communities, and the cost to all alternatives. The EIR should discuss in detail how they propose to use Measure funding and the legal, and rational basis of using said funding for the proposed project as opposed to other transportation needs within the acad. The EIR should evaluate why monies are expended on the proposed project while the county is reducing buses and availability of public transportation to other areas of the county.

The EIR should study the proposed project and needs for transportation in the proposed area in relation to the needs for transportation and expansion in other areas of the county and rate them on the basis of priority and need.

From: ODYATLAW@aol.com [mailto:ODYATLAW@aol.com]

Sent: Wednesday, April 13, 2011 9:44 AM
To: SR710Conversations
Subject: comments for the record

Odalis C. Suarez
144 N. Glendale Ave., Suite 206
Glendale, CA 91206

(818)240-3411

email: odyatlaw@aol.com

Request that the following comments be made part of the record for the proposed 710 Gap Closure.

1. SCOPING
A scoping meeting should provide interested parties with the opportunity to comment on a proposed project and proposed alternatives. However, the present scoping meetings presented by the lead agency were so vague and ambiguous that no one can identify what the proposed project is. Without straightforward identification of the project and alternatives it is impossible to provide adequate comprehensive comments. Without a straightforward presentation of the proposed project the community is completely in the dark as to what are the potential studies that would be necessary to the affected areas. Without a straightforward identification of the project the comment period is so broad and undescriptive that it is an injustice to the CEQA process.

The scoping meetings were scheduled throughout the affected area, however, it was not until the last minute that the lead agency agreed to have a public meeting in the La Canada/La Crescenta area. In light of the extensive affects on traffic and pollution in these areas, more time and opportunity to comment should have been provided.

The scoping meetings were all scheduled at the 6:00 p.m hour where most people are either barely getting home or barely having dinner. Any scoping meeting for proper response and community input should be scheduled at 7:30 p.m.

The lead agency made no effort to advertise or publish the scoping meeting for the affected area. A last minute notification was all that was provided to the affected areas.

There was absolutely no presentation by the lead agency. The extensive amounts of money that was expended on the scoping meeting does not reflect the minimal presentation made by the agency at each meeting. Numerous agency representatives walked around the meeting and were present at the meetings, however, they provided no input, presentation or information.

The process should be renewed with a proper scoping process identifying the project, proposed alternatives and major impacts. Additionally, the scoping session should consider all of the affected areas not just the immediate areas of construction. The 210 corridor up through the 5 and 14 freeway will be severely impacted and should be included in the study

area. Additionally the 210 east beyond Altadena and up to at lease the 605 freeway should also be made part of the project area as major arteries of the 710 and the transportation of goods. Without a proper scoping of the project the process is flawed.

2. ALTERNATIVES
The EIR should provide a rail alternative to transport all merchandise and goods to a hub in a less congested area where goods can be distributed by truck to other locations.

3. CONSIDERATIONS IN THE PROPOSED PROJECT AND ALL ALTERNATIVES
All proposals should extensively study, analyze and provide detailed statistics of the following:
A. Construction Impacts
The project and alternatives should have a detailed study of the construction period for the project. How long will the construction last, how will the construction affect traffic, traffic congestion, how will the construction period affect the aesthetics of the area, how will affect air pollution, how will it affect noise pollution, and all mitigation measures for the affects during the construction period must also be studied and included.

B. Historical and Aesthetic Concerns
The project and alternatives must also study and consider the following areas and mitigation measures for any affects: Aesthetics , air pollution, noise pollution, traffic congestion, affect on historical significance, affects on protected trees, historical structures, or potentially archeological and paleontological findings.
`
Although the South Pasadena and Pasadena Area are affected by the removal of structures and the building of structures, the EIR should provide an in depth study as to the historical affects of the area. Pasadena and South Pasadena are not merely local areas that protect historical interest, the entire region enjoys and benefits for the historical preservation of Pasadena and South Pasadena. The EIR should also look into the affects of impacting a historically significant area in light on regional historical areas and the existence or non existence of similar areas.

C. Traffic
Traffic studies should be made during different periods of time during the day and on different days and in all affected areas. The studies should provide data and statistics during peak times of traffic and how the peak traffic times will be affected by any GAO closure locally as well as regionally.
Traffic studies should not only include traffic on the main freeways but also must include spill out traffic to neighborhoods along the 210 freeway and the 134 freeway. Further study should be made regarding the use of local neighborhoods as pit stops or rest stops and the use of local neighborhoods by truck transportation. Can these neighborhoods support the increased traffic and use of their public roads? The traffic studies should also include mitigation measures to prevent the use of local communities and the foothill as alternative routes for excess traffic or truck traffic.
All traffic studies should consider the increase in traffic collisions and deaths along the 210 freeway from semi incidents including statistics and data to support such findings. The traffic studies should also include mitigation measures to prevent the use of local communities and the foothill as alternative routes for excess traffic or truck traffic.
In light of the additionally vehicle traffic and truck traffic in the proposed project area and in the affected traffic area, the EIR should review all freeway connection ramps and how these structures will be affected by increase traffic and especially increase traffic use. In particular the connections from and to the 2 freeway and onto the 134 and 210 freeway

east. Will these connections be affect, will additional traffic congestion devices need to be implemented, and will the structures withstand the extensive use by semi trucks.
Traffic studies should also include potential safety concerns throughout the 210 corridor and hillside areas. These areas facilitate the possibility of run away trucks and potential high speeds of trucks that could result in deadly accidents. What safety measures will be implemented on the 210 corridor?
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Even if the proposed project does not consider a toll road for the gap closure, a toll must be studied and the impacts addressed since it is a potential and possible future use of the proposed project in light of the heavy truck use of the 710.
The EIR should also study the impact on local law enforcement agencies such as CHP,, Sheriffs and local police agencies as a result of the increase in local traffic, increase in freeway traffic, and increase in community exposure to transient criminal activity.

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Finally, the study should also consider the affects on air quality to hospitals within the area of the proposed project and the affected areas such as the Huntington Hospital and Verdugo Hills Hospital. The study regarding the hospitals should not merely include air quality but also response time as to emergency vehicles and emergency services in these areas that are already overwhelmed with traffic and traffic lights.
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The EIR should study the proposed project and needs for transportation in the proposed area in relation to the needs for transportation and expansion in other areas of the county and rate them on the basis of priority and need.

From: Vanessa Ha [mailto:vanessaha819@yahoo.com]
Sent: Wednesday, April 13, 2011 9:56 AM
To: SR710Conversations
Subject: Re: SR710

To:

Mr. Ron Kosinski, Deputy District Director Division of Environmental Planning Caltrans, District 7 100 S. Main Street,

MS16A Los Angeles, California 90012

With this email, I hereby express my support of the Scoping letter dated April 9, 2011 sent by Stephanie Johnson, Los Robles Avenue, San Marino, CA 91108.

Please address the issues in your EIR / EIS and mitigate the negative impact on Los Robles Ave. in the best interest of our neighborhood.

regards,

Vanessa ha
626-278-3835
vanessaha819@yahoo.com
475 La Mirada Ave.
San Marino, CA 91108

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 12:22 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#57]

Name *	tom rath
Email (you@email.com) *	trath@flatironcrop.com
Phone Number	(760) 916-9057
Address	1770 La costa Meadows Drive San Marcos, ca 92078 United States
Select a Subject *	Add me to the mailing list
Comment *	the sooner the better

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 3:24 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#58]

Name *	Michael Larsen
Email (you@email.com) *	m.larsen@mac.com
Address	90041 United States
Select a Subject *	I have a suggestion
Comment *	Stop the 710 extension project. Don't ruin our communities, health and way of life so that trucking companies will be able to do better business. Scrap the 710 and create a railway from Long Beach to Victorville. Let that then be the distribution point for imports. Stay out of our neighborhoods!

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 4:11 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#59]

Name *	Tina Gulotta-Miller
Email (you@email.com) *	tmgulotta@yahoo.com
Phone Number	(323) 254-7776

Address	6433 Crescent Street Los Angeles, CA 90042 United States
Select a Subject *	Comment for scoping record

Comment *

I am against the SR-710 project for many reasons. I don't believe that this project will help alleviate traffic congestion and/or be beneficial to any of the communities that you propose to slice through. This type of project only continues to drive up its own costs that I believe have become too expensive to even consider building here. Our state and nation already have huge deficits to contend with, so why are we even thinking about spending a huge amount of money on a project that so few in the public sector are supportive of?

We have not heard enough discussion on what the objectives are on this expansion and why you need to build more freeways. I attended many of the outreach meetings by CalTrans and found them to be narrowly focused and crippled in communication to the communities involved. There are more alternatives to transportation in Los Angeles and I feel that you have not explored all the options or discussed with the communities at large how they will be effected by this project. In the end, no one wants to hear that a huge freeway tunnel above or below their community is going to ease traffic concerns and make life so much better for all. I see traffic congestion, financial burdens both on a Federal level and State of California level, air quality issues, pollution, and a lowering of the quality of life of the people that will be living either above or below this massive transportation project. And finally, that the people of East and Northeast Los Angeles will be exposed to the h armful hydro-carbons that will be produced. I have read negative information on communities that live by a freeway interchange and we have many in Los Angeles. Why would we want more of this harmful exposure? I know people will become exposed at levels they never thought they would be exposed to before and become seriously ill?

I say NO SR-710.

Thanks,

Tina Gulotta-Miller

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 4:26 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#60]

Name *	Mary Cammarano
Email (you@email.com) *	marycamm@sbcglobal.net
Phone Number	(626) 286-0565
Address	1218 Palm Ave San Gabriel, California 91776 United States
Select a Subject *	Comment for scoping record
Comment *	Please complete the 710 Gap-Thank You

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 5:11 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#61]

Name *	Lacey Wagner
Email (you@email.com) *	lwagnero@gmail.com
Phone Number	(323) 552-8478
Address	229 NorthAvenue 49 Los Angeles, CA 90042 United States
Select a Subject *	Comment for scoping record
Comment *	I am completely against the scoping endeavor to pursue viability for the 710 freeway connection. No one in this community wants to see the 710 come through our historic community neither above ground nor below. This is a huge waste of time and money to pursue a project that, come hell or high water, our communities will not allow. I want to see effort put towards alternative, less oil driven means of reducing traffic within East Los Angeles and the surrounding communities.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 5:22 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#62]

Name *	Marilyn Smith

Email (you@email.com) *	msmith72719@aol.com
Address	4469 Saint Francis Place La Canada, CA 91011 United States
Select a Subject *	Comment for scoping record

Comment *

I oppose any extension of the 710 freeway. I live next to the 210 freeway which would be directly and negatively impacted by any extension (tunnel or otherwise). The noise already is intolerable, and the truck noise is particularly terrible. When the 15/210 extension was opened, the volume of noise and traffic increased by a large amount. Extending the 710 would have far more serious consequences, and render much of the residential areas next to the freeway unsuitable for residential use. Additional freeway construction (an antiquated 20th century idea), and particularly a 5 MILE TUNNEL with no exits is insanity. Worse, the traffic would dump right into a corridor lined with numerous residences and schools. A rail system out of the ports to deliver goods to regional distribution centers makes the most sense on all levels: economic, environmental, quality of life for those of us directly impacted by the traffic. Health and safety of our citizens cannot be sacrificed for the benefit of some foreign (or domestic) company hoping to profit from the construction, or from a special interest group or union whose members (few or none of whom live in the impacted area) stand to profit from antiquated transportation modes. The extension is wrong when measured by any meaningful analysis.

From: Joel Shapiro [mailto:JShapiro@fc.spusd.net]
Sent: Thursday, April 14, 2011 7:40 AM
To: ron_kosinski@dot.ca.gov
Cc: SR710Conversations
Subject: EIR/EIS for 710 Project

Dear Mr. Kosinski,
Please see the attached letter, which I have also printed below. Thank you for your attention.
Joel Shapiro

Joel Shapiro
Superintendent
South Pasadena Unified School District
1020 El Centro Street
South Pasadena, CA 91030
(626) 441-5810, ext. 1100
(626) 441- 5815 fax

Challenging All Students for the 21st Century

April 13, 2011

Ron Kosinski
Deputy Director
Division of Environmental Planning
CalTrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinski,

As Superintendent of South Pasadena Unified School District, I am writing to express my concern regarding the potential impact of the SR-710 project on the health of the children in our community. There are five public schools in South Pasadena in close proximity to the proposed route of the SR-710 extension. There are also private schools and pre-schools very close to the proposed route.

Numerous studies have pointed out that air pollutants from freeways extend further than previously thought. In one study of air pollution levels in ten Southern California cities, USC investigators found that proximity to freeways poses a respiratory risk, and that this risk may be related to an increase in asthma among children who live or attend school close to freeways. According to "Science Daily" (October 21, 2002), people near freeways are exposed to 30 times the concentration of dangerous pollutants. Two UCLA studies published in the Journal of the Air and Waste Management Association and in Atmospheric Environment indicated that people who live, work or travel within 165 feet downwind of a major freeway or busy intersection are exposed to potentially hazardous particle concentrations up to 30 times greater than normal background

concentrations found at a greater distance. A study by investigators at USC published February 17, 2007 in *The Lancet*, showed that children living near freeway traffic had substantial deficits in lung function development between the ages of 10 and 18 years. According to lead author W. James Gauderman, "an individual with a deficit at this time will probably continue to have less than healthy lung function for the remainder of his or her life."

A tunnel extension of the SR-710 Freeway also poses serious health risks for the children of our community. According to an Australian study of 2009, tunnels concentrate air pollution by 1000 times. A toxic cocktail of ultra fine particles is lurking inside road tunnels in concentration levels so high they have the potential to harm drivers and passengers. Not only would excessive pollution be found inside the tunnel; it would also spew from four vents (each 100 feet or 10 stories high) and at each end portal.

Based on the very real concerns regarding the impact of the SR-710 extension on the health of the children of our community, it is important for the Environmental Impact Report and Environmental Impact Study (EIR/EIS) to be as thorough as possible. I strongly urge that a Health Risk Assessment (HRA) and Health Impact Assessment (HIA) be conducted to analyze the potential levels of pollution as well as the possible means of mitigation. At this time, there is no evidence that there are plans to mitigate the significant health consequences of the pollutants that would be expelled through the portals, smoke stacks, or other venting mechanisms. There needs to be an analysis of potential hot spots along the proposed route of the extension.

I also have a concern about the potential deleterious health impact on neighboring communities, and I would hope that the EIR/EIS thoroughly analyzes the health risks to the entire area affected by the proposed SR-710 extension. As the head of South Pasadena's public schools, I have a special responsibility for the health and safety of the children of our city. Therefore, I urge you to include the measures that I have mentioned in the EIR/EIS. I thank you for giving this matter your prompt and serious attention.

Sincerely,

Joel Shapiro
Superintendent

From: ma3coop@aol.com [mailto:ma3coop@aol.com]
Sent: Wednesday, April 13, 2011 11:18 PM
To: SR710Conversations
Subject:
Hello, my name is Mary Cooper and I have lived in my beautiful home for 25 amazing years now and my daughter Alexandria for 21. Throughout these fantastic years my daughter and I have come to develop some wonderful relationships with my neighbors who bring an element of warmth and security as we all make a from the heart effort to look out for each other and each others homes. However, I have also been under the impression for a large part of those 25 years that we would have an opportunity to purchase these homes. In short, this neighborhood has been so great to my family and I that it holds tremendous sentimental value and offers such unique character. I have listed below some alternative suggestion concerning the connection between the 710 to the 210 fwy which further jeopardizes or perhaps eliminates the opportunity of that purchase ever becoming a reality that I hope for so badly.

This connection can be created by using the Hellman Ave. off ramp, increase public transportation, complete the 110 Pasadena Fwy to 210 via the tunnel at Arroyo Parkway.
Add two lanes to the 710 entering the 10 fwy in each direction.

Please review and take into consideration my suggestions it means a great deal to my family and I.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 10:03 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#65]

Name *	james flournoy
Email (you@email.com) *	flurent@hotmail.com
Address	8655 landis view rosemead, ca 91770 United States
Select a Subject *	Comment for scoping record
Comment *	In addition to comments on the inclusion of USGS shakeout seismic simulations given at previous meetings the project must consider the new USGS Multi Hazard demonstration project "arkstorm" findings when considering hydrology

Lucy Jones USGS Pasadena is the contact

I am in favor of the most direct above ground project
many of the so called historic buildings/ churches are not seismically safe in any case
It is discriminatory to treat South Pasadena different than say El Monte or East LA for a simple freeway project

---

From: Jane Fleming [mailto:janeblessed@sbcglobal.net]
Sent: Wednesday, April 13, 2011 9:47 PM
To: SR710Conversations
Subject: Sr-710 COMMENT FOR THE RECORD

I would like to go on record to say that I am in support of completing the 710 Freeway to the 210 Freeway by what ever means needed to once and for all complete it. Whether it is completed by means of bridge, tunnel, or surface
freeway.

I believe that more that 50 years to complete four and half mile freeway is way too long.. it needs to be finished.

Albert Diaz
240 Hampden Terrace
Alhambra, CA 91801

From: Jennifer Perez [mailto:jennifer1069@sbcglobal.net]
Sent: Wednesday, April 13, 2011 9:41 PM
To: SR710Conversations
Subject: 710 traffic mitigation alternative
Hello,

I am opposed to connecting the 710 and the 210 freeway. I think that we can improve traffic congestion by having signal synchronization it is a cost-effective way to increase street and road capacity without major new construction. Orange County Transportation Authority, in partnership with California Department of Transportation (Caltrans), had success in Orange County. Why not Alhambra?

Sincerely,

Jennifer Perez

From: Carol Teutsch [mailto:cbteutsch@comcast.net]
Sent: Wednesday, April 13, 2011 9:41 PM
To: SR710Conversations
Subject: Many of us submitted comments to Ron Kosinski

Dear sr710conversation staff,
Please confirm that email comments to Ron Kosinski will be accepted and confirmed as we were told previously.
Thank you.
Carol Teutsch
841 Moon Ave
Los Angeles, CA 90065
323 352-8079

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 9:24 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#64]

Name *	Kyle Yang
Email (you@email.com) *	kyleandmh@gmail.com
Address	516 1st St Manhattan Beach, CA 90266 United States
Select a Subject *	Comment for scoping record
Comment *	

I believe that transportation options are too often geared for commutes toward downtown LA in the morning and out of downtown LA at the end of the day. While this "normal" commute is of course a priority, the project must also consider ways to increase mobility in the "reverse" commute direction. People need to get from, say, south of LA up into Pasadena and other areas into the project study area in the morning.

Secondly, I would like to comment that all buses, regardless of type, should be allowed at all times to go into carpool lanes when such lanes exist. Currently, at least on the 110, empty buses are not allowed to travel in carpool lanes - this leads to them being late on their routes. Obviously, giving this right to buses helps improve transportation and gridlock by allowing more frequent and regular bus routes.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Wednesday, April 13, 2011 9:22 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#63]

Name *	Luis Antezana
Email (you@email.com) *	maxpower92@sbcglobal.net
Phone Number	(626) 375-3170
Address	301 3/4 S Ave 55 Los Angeles, CA 90042 United States
Select a Subject *	Comment for scoping record
Comment *	I don't want a massive tunnel built underneath my neighborhood, Highland Park, with tax dollars and then supported by tolls. I believe tax dollars can be spent in much

better ways through out Los Angeles neighborhoods. I also see this type of crazy construction as a hazard to the environment. Again, i am against the 710 tunnel being built underneath Highland Park or any other neighboring community. Thank you.

From: Oscar Gutierrez [mailto:OscarAGutierrez@msn.com]
Sent: Wednesday, April 13, 2011 8:30 PM
To: SR710Conversations
Cc: ron_kosinski@dot.ca.gov; concerned_nbors@pacbell.net
Subject:

Wed 4/13/2011 8:30 PM We Never Wanted Your Freeway, Highway, Skyway or Tunnel. We Reject Any Project You Offer. Dig Your Tunnel Some Where Else!

From: Valentino, Danielle [mailto:ValentinoD@metro.net] **On Behalf Of** SR710Conversations
Sent: Thursday, April 14, 2011 6:51 PM
To: 'ctwiliams@yahoo.com'; ron_kosinski@dot.ca.gov
Cc: SR710Conversations; cynthia.ruiz@lacity.org
Subject: RE: Comments for SR-710 Scoping Report, Second and final batch

Thank you for your submission. Please note that your official scoping comment has been received and will be considered.

From: Tom Williams [mailto:ctwiliams@yahoo.com]
Sent: Thursday, April 14, 2011 4:37 PM
To: ron_kosinski@dot.ca.gov
Cc: SR710Conversations; cynthia.ruiz@lacity.org
Subject: Re: Comments for SR-710 Scoping Report, Second and final batch

This batch completes comments from Dr. Williams.

--- On **Thu, 4/14/11, Tom Williams *<ctwiliams@yahoo.com>*** wrote:

From: Tom Williams <ctwiliams@yahoo.com>

Subject: Comments for SR-710 Scoping Report

To: ron_kosinski@dot.ca.gov

Date: Thursday, April 14, 2011, 1:36 PM

Attached are the first batch of comments for the NOP/NOI Scoping for SR-710 North Extension/Gap Closure. At least one more to be transmitted before 5pm

Dr. Clyde T. Williams

4117 Barrett Road

Los Angeles, CA 90032-1712

323-528-9682 323-528-9682

ctwiliams@yahoo.com

From: Messner, Ernest L [mailto:ernest_l_messner@fanniemae.com]
Sent: Thursday, April 14, 2011 11:56 AM
To: SR710Conversations
Cc: emessner@aol.com
Subject: Comments on SR-710 Extension
Please place my comments in the record.

I am a resident of LaCanada Flintridge. I live at 4556 Vineta Ave approximately 150 North of the existing 210 Freeway.

Please include all Pasadena, LaCanada Flintridge and Montrose in your scoping area for environmental impacts.

Environmental impacts which I believe should be addressed are: increased noise on the 210 freeway, degradation of air quality, and containment of known particulates (primarily discharged by diesel truck engines) which are known carcinogens.

I do not believe a tunnel is a safe alternative due to its length and transport of flammable materials.

Alternatives to the SR-710 extension should include a multimodal transportation design to and from the Ports to include train transportation to primary distribution points in Central California, Nevada, and outside
the Los Angeles Metropolitan area. Public transit should be studied for an above ground fixed rail system connecting either in downtown Los Angeles or in one of the South Pasadena/Highland Park/or Pasadena Gold Line stations. I drive the 710 now, and aside from modest surface traffic during rush hours, there is no apparent need for a freeway to carry passenger vehicles. Surface street signals could by synchronized
and the transition road in Pasadena straightened - a modest expense.

Thank you for the opportunity to voice my comments. Ernest L. Messner

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From: Tom Williams <ctwiliams@yahoo.com>

Subject: Comments for SR-710 Scoping Report
To: ron_kosinski@dot.ca.gov
Date: Thursday, April 14, 2011, 1:36 PM
Attached are the first batch of comments for the NOP/NOI Scoping for SR-710 North Extension/Gap Closure. At least one more to be transmitted before 5pm

Dr. Clyde T. Williams
4117 Barrett Road
Los Angeles, CA 90032-1712
323-528-9682 323-528-9682
ctwiliams@yahoo.com

SCOPING COMMENTS

All comments for Scoping of SR-710 Gap Closure from MTA/Caltrans are sent:
Ron Kosinski, Deputy District Director, Division of Environmental Planning
Caltrans – District 7, 100 South Main Street, MS 16A, Los Angeles, California 90012
Email: **Ron_Kosinski@dot.ca.gov**

The Comments below reflect resolutions and concerns expressed by the following organizations:
LA-32 Neighborhood Council Board of Directors and Stakeholders
NELA Coalitions of Neighborhood Councils (total nine)
Stop710 Coalition (NELA City Coalition)
LA Red de El Sereno (Eastside Café)
Sierra Club, Angeles Chapter, Transportation and Conservation Committees

SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Scope of Works for Consultant - Scoping Report
Background for Comments:
Review of the RFP from MTA and administered by Caltrans (CTs) for the current Scoping indicated three primary objectives:
development of a **range of potential solutions**,
input on the **purpose and need** for a project
a revised **Study Area**.
The scoping sessions and others did not clearly state or provide the basis for public contributions to the scoping that was to:
develop a **range of potential solutions**,
receive input on the **purpose and need** for a project and
revise the **Study Area**.

Comments, in Italics
The EIR/EIS must include either an extended scoping period or a combined scoping and alternatives development and analyses phase prior to the initiation of preparation for the environmental setting and assessment of conceptual/early preliminary engineering of real solutions (alternatives) in EIR/EIS and responsive to the Needs and Purposes for the EIR/EIS.

The Scoping Report must provide a listing of the range of potential solutions derived from considerations given during the Series 1 sessions and through these and other comments provided for the Series 3 going

on the record.

The EIS/EIR and any pre-assessment development must include and reflect the concerns and considerations of the communities presented in the Series One, March, sessions of the "Scoping".

MTA/CTs must review and revise and recirculate the needs and purposes which changed from those in the NOP/NOI to those in Series 3 Scoping sessions and differed somewhat between verbal/visual presentations and those provided to the public in hardcopies during Series 3 sessions. MTA/CTs must extend the period of Scoping and requests further purposes and needs from the Public or agencies for specific inputs to the purposes and needs for a project which must be provided in the Scoping Report and serve as the basis for Alternatives Analyses.

CTs/MTA and the Scoping Report must assemble and verify a quantitative set of needs and purposes based on Public and agencies' comments as inputs to the process.

SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Scoping Background

As indicated above and elsewhere, the Caltrans (CTs) and MTA efforts have not been consistent, forthright and accessible, and they created an atmosphere of distrust and suspicion. This Lack of Trust, Transparency Info-Access, and Public Participation has focused on Low-Med Income residents and project opponents.

CTs/MTA must open the files and activities to full disclosure to any/all except for those items involved in litigation or fiduciary negotiation. All preparations of the Scoping Report, Alternative development and Analyses, and EIR/EIS preparation must be available on-line either in real-time or periodically (e.g., weekly bi-weekly) updated status reports with links to current drafts of information and documents.

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: General Comments - Scoping Report

MTA/CTs (California Dept. Transportation) must achieve a "rigorous" EIR/EIS scoping process through use of the FTA approach rather than the more limited FHWA, which is bias to as yet undefined highway projects, surface or subsurface.

The Scoping Report must include provision for additional comments for alternatives development clarifications prior to selection of alternatives based on the final Needs and Purposes.

MTA/CTs must formally reply in writing accepting the submittal of comments on the NOP/NOI in order to assure full inclusion of comments into the process.

MTA/CTs must provide a monthly update of activities and minutes and of scheduled activities and meeting in order to achieve a "rigorous" EIR/EIS scoping process through use of the FTA process.

MTA/CTs' use of "Gap Closure" shows bias/non-objectivity. MTA/CTs must achieve a unbiased and fully objective approach for this project and use one project name – Recommend SR-710 North Extension,

The EIR/EIS must include a full presentation of the "710 History", previous RoD and its rescension , earlier EIRs/EISs, Scopings, and full Fed Injunctions and their reviews of the multimode and how these documents pertain to the existing environmental efforts and documentation.

MTA/CTs must provide accessible information on any and all environmental studies, reports, and/or

impact reports and statements for any and all related projects that are underway or have been done and or completed near, and around the proposed 710 Project area and areas considered to be affected by the "Gap Closure".

MTA/CTs must provide for Steering, Technical, or Community Committee(s) and/or Working Groups for at least three communities' areas throughout the scoping, Alternatives Assessments, and EIR/EIS preparation period.

MTA/CTs must clearly and specifically indicate what efforts have been made to provide information and notices this information to the community of El Sereno.

The Scoping Report must provide:

Sources/models of projected traffic for freeways and arterials, presumably SCAG which will be used in all subsequent analyses, projections, forecasts, and assessments as part of the Alternatives Analyses and the EIR/EIS preparation;

Sources, access and availability, authors/operators, and funding sources/amounts

Assumptions: fuel prices, LA parking, Truck Bans, Toll Prices, O/Ds, capacities, LOSs

Assumptions regarding SR710 South Expansion and High Desert Corridors. (O/Ds)

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: General Comments - Scoping Report

MTA/CTs must extend the "Scoping Period" as the NOP/NOI, public handouts, and visual/verbal presentations have differing "Needs and Purposes" (text, handouts, and CTs presentations) and "Initial Study Area" (text vs map) and therefore the proposed mitigations and alternatives cannot fully reflect the "initial Needs and Purposes", depending on which sets are used. MTA/CTs must recirculate the single operational "Needs and Purposes" and "Project Area" of the "project" in order to receive appropriate comments "inputs" regarding setting, impacts, mitigation, and alternatives ("potential solutions").

MTA/CTs must extend the "Scoping Period" and expand communities' participation as the scoping did not present the issues of Environmental Justice even though such significant community issues arose during the 1990s regarding the same project. MTA/CTs promotions and the Scoping program were biased as the "Study Area" and Scoping meetings. As no "initial study" was presented to establish absence, level, and significance –Low/Mid-Income resident impacted by thru-commuters– Direct/Secondary Impacts

Meeting were disproportionately focused on white, upper middle class outreach with little or no releases through Spanish, Armenian, and Chinese media.

Meetings were disproportionately focused on higher income areas with little or no releases or promotions through media which focus on low-middle income residents.

More affluent communities benefit while less prosperous communities are impacted, and some past alternatives which may be considered in the current process have used physical construction in lower income, less affluent communities in order to reduce impacts of congestion, etc. in richer more affluent communities (e.g., surface freeway through Los Angeles in order benefit Alhambra, San Marino, South Pasadena and western Pasadena).

The EIR/EIS must include under SocioEconomic elements the economic and social status of areas which are adversely impacted and those which benefit from congestion reduction and mobility/accessibility enhancements. The EIR/EIS must demonstrate balances of impacts/benefits for each of the

benefited/impacted communities (e.g., each neighborhood council within the City of Los Angeles).

The Lead Agencies provided conflicting Project Needs/Purposes which has promoted Public Distrust of the project development, The Agency Scoping session and some Public Scoping sessions (Series 3) included in Purposes and Needs: "**Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including public private partnerships"**. During MTA considerations of moving forward with the Scoping, Dir. Katz also included a motion amendment to include financials in the EIR process and was approved by the Board. All EIRs/EISs include elements under SocioEconomic elements in which such can be considered and assessed.
The EIR/EIS and Alternatives assessments and analyses must include financial and economic aspects for each alternatives, including: local LACo jobs creation, labor vs equipment ratios, LACo equipment rentals and uses, small/medium contractor uses vs state/national/international financial ratios, etc.

MTA/CTs meetings only included El Sereno, Highland Park in City of Los Angeles, although a third of the Study area lies within the City of Los Angeles, third between LA and SR19, and a third east of Rosemead/SR19. More meetings were held in Alhambra, South Pasadena, and Pasadena in the central third compared to one in San Gabriel (eastern third) and original one then two in LA, western third. Two meetings were held totally outside of the Initial Study Area Map and physical descriptions in La Canada Flintridge and Glendale, while none were held in Monterey Park and East LA/City Terrace which lie within the mapped Study Area.
MTA/CTs must extend the "Scoping Period" as part of the Alternative Analyses for rigorous scoping and public participation in both Scoping and Alternatives development.

MTA/CTs must recirculate an updated NOP/NOI as the purposes and needs and the study areas presented in the originals changed significantly or are different from those being circulated to the public and to agencies.

MTA/CTs must extend Scoping and recirculate the NOP/NOI as the attempted education of the Public and Agencies about CEQA and NEPA did not provide realistic information on how to comment on the NOP/NOI for such a large Study Area of more than 100 sq mi with differing purposes and needs and differing "project descriptions".

MTA/CTs must recirculate an updated NOP/NOI as the project reported in the NOP.NOI differs from that presented in the Agency and Public Scoping sessions. The NOP/NOI presented measurements, 4.5 miles, and start and finish locations of Valley Blvd. (Alhambra and LA) and Del Mar (Pasadena). During presentations, no project description information was provided and the presenters indicated all possible alternatives, Surface/Subsurface, would be entertained from the Public or Agencies.

The Scoping report must include a full documentation of functionally related projects and of the project assumptions which form the basis of the purposes and needs for this "project" covering an area of 15+mi long and 6+ miles wide.

MTA/CTs must integrate with the nine-plus Los Angeles City's Neighborhood Councils within the Project Study Area and zone of influence and must incorporate them into the Alternatives Analyses process prior to the preparation of the EIR/EIS.

The EIR/EIS must include:
Categorical declarations:

SR710 project shall include trucks or shall ban trucks and
I-5 shall or shall not include truck restrictions/bans once the SR710 project may have been completed for trucks;

A comprehensive listing of all freight projects in the SCAG's area from Port Docks to Logistics centers or interstate rail shipments along with the anticipated flow capacities and volumes;

A thorough assessment of the needs and purposes of the SR710 North Extension project in relationship to the overall freight system throughout the SCAG area and specifically any changes proposed for I-710South, I-210 north of SR134, and SR14 from I-5 to SR138 and beyond;

A thorough assessment of the dependency of the SR710 project upon the I-710South project and the dependency of the High Desert Corridor Project on the SR710 project; and

A comprehensive listing of project and land use development dependencies (including Altadena, LaCrescenta, and Palmdale-Victorville) and assessment of growth inducements and secondary impacts both on the up- and down-stream projects.

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Needs, Purposes, Goals, and Objectives

Some EIR/EISs simply state that ANY improvement, reduction, or increase fulfills the "needs" without regard to any quantitative levels and levels of impacts.
Prior to the initiation of Alternatives Analyses, the Scoping efforts and/or EIR/EIS process must provide a single set of all needs, purposes, goals, and objectives for the SR710 general categories of include quantitative "Needs" and "Purposes"

General Regional Network – Qualitative – Goals, Needs and Purposes
General Regional Network – Quantitative – Goals, Needs, and Purposes
Regional Network – Any transport facilities considered as affected, benefited or degraded, by the absence or future presence of the SR710 North Extension
Project Area Network – Qualitative – Goals, Needs and Purposes
Project Area Network – Quantitative – Goals, Needs, and Purposes
Project Regional Network – Any transport facilities considered as involved and/or affected, benefited or degraded, by the absence or future presence of the SR710 North Extension within the Study Area of I-5, SR2, SR134, I-210, I-605, and I-10

*Based on the written "**Preliminary Purposes and Needs"** of the Scoping Sessions, the Scoping Report must clarify and incorporate the following comments by specific needs and purposes: The NOP/NOI stated only two needs and/or purposes but during agency and public scoping other needs and purposes were added in visuals and verbal presentations but without inclusion of all items in hard-copy handouts to the public. Verbal requests for copies of the presentation materials were met with responses that the client had not approved such, although they had been provided to others and include the following:*

The Scoping process has not provided a basis for proposing potential impacts, related mitigation measures and reasoned alternatives - Lack of project description – no physical project in a 100 sq mi area - created confusion as to what comments involved. Alternatives assessments and analyses must be open to all proposed alternatives and every alternative must include a Truck

Ban and Truck Allowed Option with appropriate physical rather than regulatory restrictions – e.g., clearances of 12ft vs 16ft.

All needs and purposes must be formally approved by both Caltrans and MTA and must be quantified and objective and must be available and accessible via webpages to the public and must allow for full public commenting. Following such, additional appropriate alternatives can be reasonably formulated and presented. All proposed alternatives must be judged numerically against quantified N/Ps.

All alternatives must be assessed in public and in writing, recommend webpage for each and must allow for full public commenting on the alternatives and the assessment process.

SR710 North has been reviewed before the current efforts and thereby current needs and purposes must be reviewed and compared to those of the 1990-2003 and those used for the 2006 feasibility study.

The Scoping Report must provide the historic and current needs and purposes for the SR710 "Gap Closure" and/or North Extension, compare the different sets (if different), and provide rationale for any changes from the historic sets to those proposed for the current efforts..

1. Improve regional mobility and accessibility for the movement of people, goods, and services

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels which must include existing and future "growth" levels comparable with modeled levels

Improve – existing and alternative values, criteria levels of significance to Study
Regional mobility
Regional accessibility
Movement
People – individual cars, bus, rail, and others
Goods – Containerized, bulk, or break-cargos, 3, 4,5, and 6 axled goods trucks
Services – requires definitions or sources of terms

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by numerical or percentage values.

2. Reduce circuitous out-of-direction travel on the network

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for –

Reduce – In feet, yards, - direct line, pavement lengths, travel times, etc.
"Circuitousity" – straight-line:route distances between origins and destinations
"Out-of-Direction" – shortest possible:fastest route distances for same origins-destinations
Network – any part of transportation facilities with more than 100 ADT involved in the Study Area

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for the "Network" used to establish the "routes" and distances – freeways, park-/expressways, highways, arterials, and local streets between origins and destinations

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels:

insignificant, recordable, important, and significant or fully quantified by numerical or percentage values.

3. Reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels and specific listings for

Reduce – straight-line:route distances between origins and destinations
Congestion on Arterials – give specific classifications – Major Highways Class I or II, etc.
Congestion on Local Streets - Collectors or local streets – give specific classifications
North-South Arterials NE-NW to SW-SE respectively
Examples - San Fernando Road, Monterey Fair Oaks, Rosemead, etc. but not Huntington, Valley, Main-Las Tunas, Mission, Figueroa
Clarify as to whether East-West arterials and local streets are excluded
Currently adversely affected – Within the context of the LA County provide basis for selection, references, and screening for adversely affected vs unaffected.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

4. Improve regional travel time savings and thereby reduce loss of productivity associated with congestion

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Improve – increase compared to what basis and time frames – current, 2035, or 2065
Seconds, minutes, etc.
regional travel time savings – District 7 summations, Study Area,
reduce loss of productivity – Driving, work, home and family, leisure time, etc.
associated with congestion – defined congestion and enumerate – LOS-F, F^1, F^2, F^3, F^4,etc.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

5. Provide additional connectivity in the regional network for use by public transit

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for

Provide – bus stops, transit station facilities, etc.
Additional Connectivity – lineal footage, ramps, etc.
Regional Network – Study Area by freeway/figure, by operational origins-destinations, etc.
Use by public transit - MetroLink, Metro heavy rail, Metro Light Rail, Metro buses, municipal buses of all cities within the Study Area.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each of "Through Traffic" (origins or destinations outside of the Study Area) and "Local Traffic" (origins and/or destinations within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

6. Improve regional and local mobile source site/air quality characteristics

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Improve - increases or reductions in establish air quality values
regional and local mobile source[s] – estimate individual and operating mobile categories
regional and local mobile site[s] – estimated for mobile sites – e.g., north of Glenarm to Foothill/Orange Grove in Pasadena, I-5 from I-10 to SR2, etc.
air quality characteristics – particulate matter – PM0.1, PM2.5, PM10, etc.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each Alternative within the Study Area and throughout the region. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

7. Reduce greenhouse gas emissions from mobile sources

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Reduce – as to area for categorizing – Airshed, LAMetro Basin, Project region of influence, Project study area, Project Right-of-Way, etc.
GHG Emissions – CO2, oxidized CO, and CH4 (compressed natural gas; CH4 has 20x more effect than CO2)
Mobile sources – including base-load coal-fired generation of electricity for transit, methane production and delivery into buses and other vehicles, etc.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each Alternative within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

8. Provide a project that constrains impacts in local communities to acceptable levels

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Provide a project -
Constrains impacts – Explain and quantify
Local communities – All neighborhoods with 2500ft of any alternative.
Acceptable levels – All project levels must be equal or better to existing levels.

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each alternative within the Study Area. Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

9. Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including public private partnerships

Also covered under separate comments specific to this subject.

The Scoping Report, Alternatives Assessment, and EIR/EIS must provide quantitative levels for:

Develop -
Financially feasible project – Include capital, financial, and operations & maintenance costs
Consideration – Requires fully quantified costs and schedules of expenditures and revenues
Cost effectiveness – Include Cost/Benefit as the primary indicator of effectiveness
Viable funding strategy -

Public private partnerships – excluding Design and Build

All quantifications must include actual levels for 1992, 2003, and current 2011 as part of existing resources and for 2020, 2035, and 2060 forecasts for the project's planning period and typical project life for each alternative within the Study Area and any financial and funding relationships beyond the Study Area, such as facilitation of tolling on other highway elements . Criteria Levels must be ranked as to at least 4 levels: insignificant, recordable, important, and significant or fully quantified by absolute or percentage values.

SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Financial Purposes and Needs
Resources, Impacts, Mitigation and Alternatives

Written handouts of Project Purposes and Needs did not contain the same statements as presented in visual slides and repeated verbally as part of the Agency and public scoping sessions. Although direct responses to inquiries for copies of the public presentations, no copies would be provided; a copy is available through online sources at: http://www.bizfed.org/files/710NorthGap_ppt.pdf. Such online sources were not made known to or referenced for the Public. The exception (last one in listing has been discussed in a separate comment submittal and involves: **Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including public private partnerships**

The MTA Board approval of the environmental considerations for the SR-710 North Extension/Gap Closure included amendment statement to include the financial aspects. Throughout the scoping process, presentations of purposes and needs by Caltrans has included:

"Develop a financially feasible project, taking into consideration
cost effectiveness and
viable funding strategies,
including public private partnerships"

Furthermore, Caltrans recognizes the EIR category: Economic and Social Effects -

"Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. Although primarily directed at physical changes, CEQA regulations require that socioeconomic consequences of the physical change be analyzed."

"This means evaluating the impacts on an existing community, on religious practices, and on business activity brought on by the physical changes directly related to the project." (Volume 4 of the Caltrans referenced Environmental Handbook).

Therefore, CTs/MTA must provide in the Scoping Report, Alternatives Analyses, and EIR/EIS full financial analyses prepared for each alternative, including but not limited to:

Existing financial resources available and project alternatives' shares of such resources
Project alternative cost estimates
Life-of-Project
Total Capital Costs
Debt/Financing Costs
Operations Costs
Maintenance and Replacement Costs

Funding strategies
Public Only
Public-Private Partnerships as F&B, D&F&B, D&F&B&O, D&B&F&O&M
Revenue Sources
Investor Assessment Only – Unsecured corporate bonds allowed
Public provides Rights-of-Way only,
Public Assessment – Either separately or combined with investor assessments
LACounty Sales Taxes, Gas Taxes, Property Taxes/Fees,
Betterment District Fees, etc.,
User and Beneficiary Origination Fees –
Container/Tonnage/Use Fees by Manifest- Ports of LB & LAm
Trucker Fees – fuel taxes, vehicle registration, direct user;
Beneficiaries and Impacted SocioGroups
Delineate and defined existing socio-economic characteristics of those who benefit and those who may suffer impacts,
Delineate and defined socio-economic characteristics of those groups who benefit and may suffer impacts during the Project planning period 2015-2035,
Delineate and defined socio-economic characteristics of those groups who benefit and may suffer impacts during the life-of-project period (2015-2065+);

1. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Needs and Purposes and Screening
Written handouts of Project Purposes and Needs did not contain the same statements as presented in visual slides and repeated verbally as part of the Agency and public scoping sessions.

Once the needs and purposes for the Project are established and quantified as indicated as the purpose of the scoping, CTs/MTA must define and circulate sets of threshold criteria for alternatives screening comparisons of alternative achievements as compared to detriments. MTA/CTs must use these threshold criteria throughout the alternative development and screening process to ensure that the Project needs as expressed in the project needs and purposes are met for both the regional and local systems in a quantified manner.

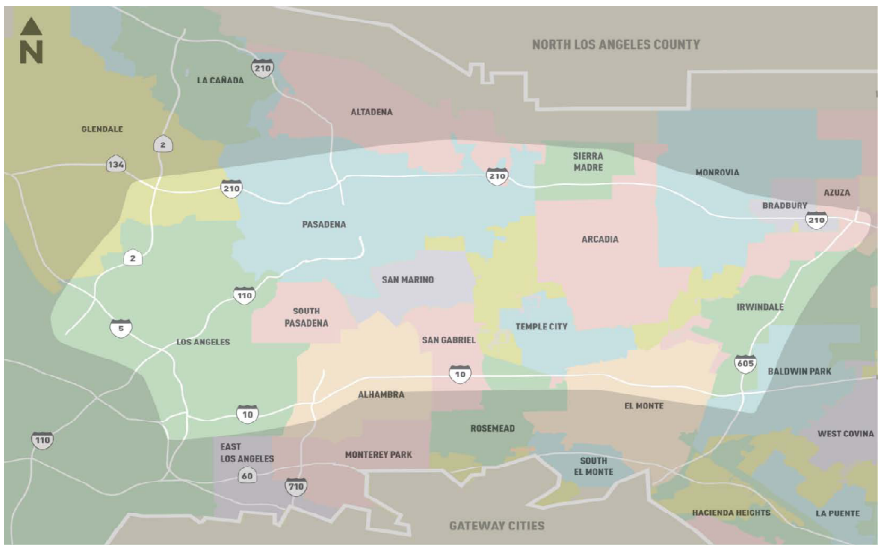
2. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Project Description
The Project Description even within the CTs transmittal letter and attachments in the NOP/NOI for agencies contains inconsistent text descriptions as follows:

> Transmittal Letter "…710 Gap Closure Project…consists of **constructing an extension** of Interstate 710 from its existing northern terminus in the City of Alhambra to a new, yet to be determined terminus…a gap in the I-710 corridor…**distance of approximately 4.5 miles**…An **underground highway tunnel is under consideration**…may involve one of five possible route alignments." Attachment to above letter: "The proposed project…**may** include…surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems. local street upgrades, traffic management systems **[no mention of multimode low build considered in 1990s-2000s]** and a no build alternative…contributes to congestion on **local streets** and…**regional freeway system**. The objective…relieve congestion and improve mobility within the study area." (**emphasis added**; Mar.28, 2011)

The Scoping Report, Alternatives Analyses, and EIR/EIS must clearly provide objectives (which requires

quantifications and scheduled elements) and perhaps longer term goals through the life of project, 2115 and coordination between goals and objectives and the Project's needs and purposes. These texts differ from the needs and purposes of the Public and Agency Scoping Sessions (Series 3). Here only two objectives while presentations had 8-9 needs and purposes.

As scoping is required to clearly define the Project's area and location the Initial Study Area contained in the NOP/NOI does not and the Project area contains 100 sqmi, approximately 6+mi NS x 15+mi EW while the text Description - West: SR2, North: SR134/I-210, East: I-605, South: I-10 does not conform with the Image Description -



The Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must all clearly define the physical locations and the functional network elements of the Project. The current NOP/NOI and presented materials do not clearly identify the Project, description, and physical/functional locations. References to the five zones are not explained and related to the Project location(s).

The Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must include the potential Functional Systems in which the Project will function and the conditions of the same system without the Project. The Functional Systems must include any transport-related projects or systems which may influenced or affected by the proposed Project – at the levels of Metropolitan Network, Regional System, Study Area, and Corridor/Local Areas.

The Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must include the desired Operational Levels and Regulatory/Industry Standards and Requirements, such as: expected volumes/vehicles per hour per lane or maximum percent longitudinal grades for light vs heavy duty trucks and other vehicles (2%, 5%, etc. for up to 5000ft). Without such requirements, proposal of alternatives and mitigation measures cannot be adequately provided and may be unreasonable.

Materials provided do not clearly identify the Project's basic assumptions for current and future conditions related to the Project; the Scoping Report, any Alternatives Analyses, and EIR/EIS for any major transportation infrastructure project must include the basic physical, functional, economic, and financial conditions assumed for the development of the Project, Alternatives, and mitigations.

The Scoping Report, any Alternatives Analyses, and EIR/EIS must provide estimates or assumptions, such as:

Gasoline/Diesel Fuels of $4.50/gal by direct costs and Fuel Taxes
LA City Day-Parking Fees
Ports of Los Angeles and Long Beach projections of containers imports/exports
So.Cal.Internatl.Gateway and Integrated Container Transfer Facility projections of containers movements

2. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Project Description – Caltrans Lands and Properties

As part of the Scoping Report, Alternatives Analyses, and EIR/EIS, Caltrans (CTs) must provide a map and listing of all existing CTs, State, and MTA properties which are currently unused for any public purposes, are vacant, or have been leased for non-transportation uses within the Study Area as defined in the figure above. The listing should indicate original purchase date, purchase costs, and current status, whether occupied or vacant, perhaps as of January 1, 2011.

3. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Important Known/Suspected Resources and Expected Significant Impacts

During the Series 1 sessions, many community members listed the resources considered to be important or significant within their communities, their current transportation concerns, and considerations (solutions) as to how to solve such concerns. Some of these sessions occurred before and after the date of circulation for the NOP/NOI but presenters stated that this is not part of the Scoping comments.

MTA/CTs must require incorporation of ALL public statements from participants during the Series 1 SR-710 Conversations sessions into the Scoping Report and incorporate them into the Alternatives Analyses and EIR/EIS for important environmental resources, current adverse conditions, and mitigation measures or alternatives for the Study Area, for example:

MOST IMPORTANT RESOURCES

Mission Station/Farmers Market, Station/Farmers Market Trader Joe's Home Town
Mission-GoldLine Transit Station Village
Huntington/Fremont Transit MultiFamily Neighborhood Villages (MTA258/79)
SoPas and Glendale Cities of Trees and Top-Recognized K-12 School Districts
Meridian-Garfield Historic Districts -1920-30s Old Transit Villages/Centers
Historic Districts -1920-30s Old Transit Villages/Centers
Short Line/Berkshire Historic District; Numerous Bungalow-1920-30s Transit Villages
Golf Courses, Brand, Wilderness, and other Parks, Forest Lawn, Equestrian
Great Views of SanGabriel, Verdugo, San Rafael, and Hollywood Valleys/Hills/Mountains
Green Hills - Ascot Hills, Elephant Hill, Barrett Hill, Montecito Heights, Monterey Hills
Arroyo Seco River and Valley
Small Town/Village/Hills Enclaves
Strength in Fusion – Hillside Ordinance/Manorization
Small Town/Village/Barrio Cohesion and Hill/Valley Enclaves
"Pride of Place" 1990s Env.Justice Suit Against 710 Tunnels
Alhambra's 710 Degradation of El Sereno/Sierra Park
SoPas Isolation by Street Barriers along City Boundary

El Sereno Recreational Center/Middle School
El Sereno Downtown Planning by Community Members
Community Variety – Buddhist Temples, Korean Church and Protestant/Catholic Churches
Rose Bowl/Parade, OldTown, City Hall,
Huntington Hospital and Medical District
CSU Los Angeles, USC/LACo Medical Startup Facilities
Active BioMedical Adelante Industrial Development, CRA and Enterprise Zones
PCC-College, Ambassador and CalTech Institue
NortonSimons/Huntington Museums
South Pasadena and Pasadena City Libraries

GoldLine Transit Villages
MetroLink Transit/Amtrak Station
GridIron Roadway and Green/Walnut OneWay Couplet
MTA Bus 256-Community Supported for 4 years
Central Access to LA, Pasadena, SanFernando Valley, Mountains, and Coast
SanFernando Road and Colorado Blvd. Arterial Ways
Transit Villages - Maycrest, Poplar, VanHorne. Eastern, Collis, Monterey Rd., Soto/Mission
Buses 78/79/256 and DASH
First Single Grade-Separated RR Crossing

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Geology, Mineral Resources, Soils and Topography

A major Study of the geology of the Study Area was conducted and resulted in a statement that all routes were technically feasible for various types of bored/mined tunneling methods. The Study also found subsurface evidence of extensions of known "active faults" but although stating that they would do surface surveys, none were undertaken and reported or documented. The geology of the eastern half Study Area is complicated in areas and at depths through which tunnels may be constructed and surface-exposed geological formation clearly show "faults", fractures, and zones of overturning of beds with significant displacement.

Although these are not formally designated as "active", the EIR/EIS must conduct a thorough underground study of any tunnel alignment with borings at no greater than 1000ft intervals and at depths of no less than 300ft below surface (e.g, based on 3x tunnel diameter of cover over a tunnel diameter of 60ft plus a margin beneath the tunnel invert/floor.
All faults, fractures with displacement of more than 1ft, and overturned folding must be further documented and incorporated into designs and mitigation for ground stability issues.

Although the geological study discussed methane gas occurrences in the borings, the information provided is inconsistent and undocumented with appropriate protocols for ground gases. Several oil/gas wells occur within the delineated study area and some are not abandoned. Gas was attributed to one formation but without appropriated documentation and apparent specialist knowledge of ground gases, composition, and characteristics.
The Scoping Report, Alternatives Analyses and EIR/EIS must be based on appropriate well-documented studies of existing well records (e.g., State DOGGR) and ground gases during every boring for any purposes. A well-qualified "gas expert" must be used and a well monitored three-point monitoring system must be used, similar to those used by MTA/RTD for the Wilshire segments of the earlier Red Line Phase 2 along Wilshire and Fairfax streets.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Structural Geology, Seismicity, Liquefaction, Subsidence, and Landslides
The earlier referenced geological study did not include appropriate geological investigations of ground stability. Geological materials may have been analyzed but the structural geology was not documented for the five zones or the current Study Area. General statements of seismicity and "active faults" did not focus on the documentation required for the EIR/EIS and especially for Alternatives Analyses.

The Alternatives Analyses and EIR/EIS must include a full geological documentation of all significant construction and all tunnels zones and corridors, including:

All faults, fractures, and complex folding – surface and subsurface evidence
Microseismic monitoring for events of <R4 (e.g., 100 seismometers)
Groundwater levels – initial and seasonal (requiring piezometers in borings)
Ground levels monitoring (all past records, quarterly and later annual measurements)

The documentation must be based on 1000ft intervals within 3000ft of any significant construction and all tunnels.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Water Resources and Quality – Surface Waters
The Alternatives Analyses and EIR/EIS must include a thorough stormwater and waterway inventory throughout the Study Area and must be used within the Alternatives Analyses to evaluate the current storm water concerns of the Regional Water Quality Control Boards for reducing runoff and reducing pollutants to surface riverine and coastal regimes.

The Alternatives Analyses and EIR/EIS must include annual and maximum stormwater, groundwater, and wastewater generation for each alternative and the Project and any treatment required for discharge or onsite reuse.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Water Resources and Quality – Subsurface Waters
The EIR/EIS must include a thorough groundwater inventory throughout the Study Area and such information must be used within the Alternatives Analyses to evaluate the current groundwater uses and disposition concerns of the LA and San Gabriel Rivers Basins adjudication and Water Masters. The Alternatives Analyses and EIR/EIS must include an integration of the geological and groundwater studies in order to properly consider the impacts of deep construction and surface development upon the infiltration/recharge, movement, and potential uses of groundwater.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Air Pollution from Project Implementation

The Alternatives Analyses and EIR/EIS must include a thorough inventory, analyses, modeling, and assessment of air pollutant generation, air quality, and potential measures to maintain and improve current air quality. The basic approach must include the basic criterion of "do-no-harm"; existing air quality shall not be degraded and shall be improved over the planning period up to 2035 and throughout the Project's capital improvements expected operating life, 50-100 years.

The Alternatives Analyses and EIR/EIS must include air quality considerations separately for: 1) ONLY the Study area, 2) a regional consideration for those areas where a "significant" change (e.g., 5% up or down) can be documented to result directly from the Project, and 3) the Project-related air shed based on AQMD delineations (e.g., east of I-405, east of US-101, north of I-105, etc.).

At this time, changes in traffic are expected in the I-5 and northern I-210 corridor airsheds based on regulatory changes of truck traffic. The Alternatives Analyses and EIR/EIS must include separate assessment of traffic generated air pollutants based on Alternatives including any regulatory constraints and requirements on modes of traffic (e.g., Truck Bans on LA downtown I-5) rather than physical attributes of the Project (e.g, height clearance, lane widths, grades, etc.)

The Alternatives Analyses and EIR/EIS must include considerations of air pollutants generated during both construction and operations of any "build" alternative. Air pollutant generation would generally correspond to the construction value and duration while operations generation would generally correspond to the number and types of vehicles, not directly related to the distances and number of passengers and/or volume of materials moved.

Existing Setting - Conditions and Resources

As generally accepted, the Los Angeles Metropolitan area and the project area has been historically and for the foreseeable future (>2030) the worst air quality in the United States, and some have recommended a special category for California's South Coast Air Basin. Similarly the South Coast Air Basin (LAB) has the worst road congestion in the US and especially when adjusted for population resulting from the long distant commutes by mostly single occupancy vehicles even with the most stringent emission controls for mobile sources in the US.

The project area of about 100sq mi is largely residential or mixed residential and light commercial land uses. The project is delineated by major congested freeways and interchanges which contribute to the degraded air quality within the study area and the Air Basin, as a whole. Most cities and communities of the project area have numerous mixed multi-family and commercial arterial corridors, except for Pasadena which has a more traditionally defined central business district. Previous studies have shown more polluted air quality along I-210 east of the I-710 interchange and around the I-605/I-10 interchange compared to the eastern half of the Study Area and to the somewhat more degraded air quality in the western third of the Study Area; all levels in the Study Area are noticeably less air polluted than the I-710 corridor south of SR60.

The Alternatives Analyses and EIR/EIS must include detailed 1000-2000ft interval model cells with appropriate inventory information to support such modeling results to establish both short and longer term air quality intervals for current conditions. These results on say a 1500ft grid must then become the criteria levels for comparisons of impacts; any exceeding of the existing air quality would be considered as significant. Similarly, based on the AQMD plans and projections of air quality, modeling of future air quality through 2035 must maintain or improve (reduce pollutants) air quality without the Project, and the Alternatives Analyses and EIR/EIS must include modeling results to show that the Project would generate air quality levels equal or below the expected local air quality based on the AQMD plans through 2035.

Few industrial zones exist within the project area and are generally concentrated along the historic

railroad corridors: near San Fernando Road, Monterey Road, Mission Road, and Valley Blvd. Most industrial areas are considered as light to medium industries and integrated through community redevelopment authorities; no heavy industrial land uses exist within the project area.

The Alternatives Analyses and EIR/EIS must include the many structured, combined, and unstructured "Sensitive Receptors" contained Study Area such as:

> *CalTech, CSULA, PCC, Occidental College, LACC/Fletcher Campus, Ambassador College, Adelante/USC-Biotech, Huntington Hospital, Alhambra Hospital, LACounty/USC Medical Center, Southwest Museum, Norton Simon Museum, Huntington Library, Old Town Pasadena, Schools (K-12), Churches/Temples/Mosques, Clinics, Parks, and Golf Courses (SoP, Alh), and Rose Bowl Parades (Pas).*

As throughout the South Coast Air Basin, the predominant sources of air pollutants are transportation facilities, such as:

> Congested SR2, SR19, SR110, SR134, I-5, I-10, I-210, I-605, and I-710 ROWs/Interchanges,
> Union Pacific and BNSF Railroads' ROWs and Yards (SCIG, ICTF, Hobart, etc.),
> Taylor Yard/MetroLink (SanFernando Rd.), Mission Road Yard, Hobart, and Valley/AlhambraAve. Sidings.

Few fixed or area industrial air pollutant sources exist:

> Pasadena Power Plant-FairOaks/Glenarm (Pas),
> Humboldt/Ave33 (LA), Valley/Medford/Fowler (LA), Mission Ave./Soto/Valley (LA),
> Sycamore/Pasadena (SoP),
> Westminister/Raymond/Mission Road (Alh),
> Baldwin/Lower Azuza (Ros/ElM), East of Peck Rd. (ElM).

The Alternatives Analyses and EIR/EIS must contain:

> *Full inventory of all known/permitted and anticipated (=future) fixed air pollutant sources,*
> *Full inventory of all known area and line air pollutant sources and estimated air pollutant generations from all area (>10ac) and line sources of air pollutants,*
> *Full inventory of all known and expected sensitive receptors and corridors in the Study Area and additional detailed inventories for individual receptors within 5000ft of any major (>$200M capital works costs) project facilities*
> *Monitored and recorded air quality within the project area – monthly/seasonal ranges and resolution of at least four monitoring sites per square mile (less than 3000ft separation),*
> *Calibrated and modeled air quality within the project sectors and area – monthly/seasonal ranges and resolution of at less than 1000ft separation,*
> *Urban Air Shed Model for project area and 5mile zone of influence, especially upwind – westerly – downtown – including worst-case (maximum), median, and quartile wind circulation/mixing conditions for study area*

The Alternatives Analyses and EIR/EIS must include full weather (T/RH/WDir/WSpd) and air pollutant monitoring of all expected pollutants and precursors (e.g., CO, NOX, VOC, PM10/2.5/0.1,etc.) on a one-mile grid for at least one year and at least 1/month ballon-survey of stratification of weather and pollutants up to 1000ft above highest point in study area; conduct monthly airborne LIDAR surveys for particulates and NOX.

Potential Significant Impacts

The Alternatives Analyses and EIR/EIS must provide and compare existing, no-build future, base-case

build alternative, and other alternatives for differences and changes of air pollutant emissions and resulting regional and local air quality within the project study area.

The Alternatives Analyses and EIR/EIS must include:

- *Projected future air pollutant generations from all area and line sources of air pollutants for No-Build-, Build-Base-Case-, and Other-alternatives ,*
- *Seasonal and Annual air quality within the project area – monthly/seasonal ranges and resolution of four modeled sites per square mile throughout construction periods and for Year Two and 2035 year operations*
- *Modeled air quality for each alternative within the project area – monthly/seasonal ranges and resolution of at less than 1000ft separation within 5000ft of the alternatives' operation influence*

The Alternatives Analyses and EIR/EIS must identify those:

- *Significantly Impacted Communities - 10 highest levels of changes above existing levels for any areas of 100 acres (1000+ft radius from model points)*
- *Affected Communities - - Upper quartile levels of changes above existing and future no build levels for any areas of 100 acres (1000+ft radius from model points)*
- *Less Affected Communities - all areas with less than 25% increase from existing modeled levels*
- *Less benefited communities - all areas within less than 25% decrease from existing modeled levels*
- *Beneficiary Communities - 10 areas with most reduced air pollutant levels below existing levels for any areas of 100 acres (1000+ft radius from model points)*

The Alternatives Analyses and EIR/EIS must include and identify those areas with any increased air pollutant levels (reduced air quality) which include single "sensitive receptor" as listed above. The EIR must identify also identify those areas within the upper 10 highest increased air pollutant and contain any "sensitive receptors" within 5000ft radius. The EIR must include a "Health Risk Assessment" for any area with one "sensitive receptor" and must include a "Health Impact Assessment" for 1) any of the ten highest increase areas with at least one "sensitive receptor", 2) and for any increase-areas with more than one "sensitive receptor", and 3) areas with two highest levels and two highest increases in pollutant levels.

If an alternative has fixed sources of emissions, all sources must be assumed to be worthy of "hot spot" modeling of the emissions and air quality degradation. If modeling indicates any increases in air pollutants, the alternative must include mitigation to collect and treat air pollutants before emissions. Fixed sources in any alternative shall not be designed to reduce ground levels to existing emissions levels by elevating, heating, or increased fan velocity in order to dilute the pollutant levels; the solution to air pollution shall not be by dilution and shall be achieved by treatment/removal of pollutants.

Potential Significant Benefits

As indicated above, the Alternatives Analyses and EIR/EIS must include and identify "Beneficiary Communities (areas or zones)" within the project area and within 10,000 ft of the project area and quantify levels/estimates of improvements. If improvements occur or are expected to occur at greater than 10,000ft from the project area boundary, further studies and identification must be required.

Prospective Mitigation Measures/Activities

The EIR/EIS and Alternatives Analyses and assessments must protect Air Quality within the Air Basin. Any Alternative which increases air emissions and degrades air quality within the project area and modeling areas must include mitigations to return the area air quality to the existing ambient levels and their continued declines throughout the mid-term period up to 2035 and to meet the SCAQMD's planned achievements for 2035.

If "Hot Spots" analyses and modeling of any alternative indicate increases affecting "Sensitive Receptors", The Alternatives Analyses and EIR/EIS must include mitigation to return the air quality modeled levels to pre-existing levels equal to the 2012 ambient, and the mitigated alternatives must include receptor protection measures (e.g., air conditioning, filtration of intake air, interior air filtration, etc.) to mitigate any risk of failure by the source mitigation.

If alternatives have fixed emissions sources (e.g., any device using fans, vent stacks or "natural venting" through portal openings), all fixed emissions must be treated before release and shall not be "treated" by dilution to reduce the pollutant emissions levels.

The Alternatives Analyses and EIR/EIS must include the following mitigation measures, as part of mitigation for contained facilities, electrostatic precipitators and associated particulate filtration down to PM0.1 with removal/treatment efficiency sufficient to reduce any tunnel alternatives' emissions to equivalent to surrounding existing air quality without project.

The EIR/EIS must include the following be completed: an HRA and a socioeconomic impact study.
The EIR/EIS must include the following be identified and studied: air pollution impacts; global warming impacts; noise standards and noise impacts; growth impacts; construction-related impacts; aesthetic impacts; traffic impacts; maintenance and operation impacts; and impacts to the storm water runoff and discharge.
The EIR/EIS must include the document will include Air Quality and HRA and The EIR/EIS must include and assess concerns with the future highway projects not increasing traffic, air quality, and health impacts.
The EIR/EIS must include the following: a detailed analysis of the effects of diesel particulates on those living and working near the project; evaluation and examination of all potential health effects caused by the project; discussion of traffic-inducing and congestion-producing impacts; discussion of irreversible impacts to habitat, navigable waterways, recreation resources, and water quality; and growth of goods movements infrastructure at the ports and in the Inland Empire.
The EIR/EIS must include information about what trees will be considered to make the freeway more attractive and voiced support for designated truck lanes and limited access.
The EIR/EIS must include and assess information about a fuel-saver transit system in response to a need for public mass transit, pollution from diesel trucks, and traffic congestion.
The EIR/EIS must include previous documents and studies be considered. The EIR/EIS must include and assess with air quality, cost benefit analysis, global warming, and noise.
The EIR/EIS must include and assess with noise and decrease in housing and quality of life.
The EIR/EIS must include and assess with public notification in the Study Area, traffic congestion from trucks, health impacts, and zero emissions.
The EIR/EIS must include the EIR analyze a zero-emissions alternative.
The EIR/EIS must include and assess with health impacts and community participation framework.
The EIR/EIS must include and assess with health impacts in proximity to freeway, a threefold increase in

trucks, and the availability and legal documentation of the NOP posting for the proposed project.

The EIR/EIS must include a tree planting project be incorporated into the project to reduce pollution and noise.

The EIR/EIS must include cul-de-sacs created by the project be used as opportunities for the community gardens, tree planting, and daycare centers.

The EIR/EIS must include and assess with air pollution and health impacts.

The EIR/EIS must include and assess with more pollution and SR710/I-10, /SR110, and /I-210 connection.

The EIR/EIS must include and assess with air quality impacts and reduction of diesel particulates.

The EIR/EIS must include and assess with pollution, noise and impacts to parks.

The EIR/EIS must include and assess with air quality and improvements for Study Area railyards (Mission, Taylor, and Aurant/Alhambra Rd.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Air Resources - Noise

The Scoping Report and EIR/EIS must include a thorough and comprehensive monitoring of existing noise levels at more than 20 different locations for each alternative at daily, hourly, and instantaneous/peak (10 sec.) intervals within the project area and similar monitoring wherever modeled traffic would increase over those at present. The Scoping Report and EIR/EIS must include inventory of all noise sensitive land uses including but not limited to the following:

Medical, Senior Care, and Children Care facilities and complexes
Religious and cultural facilities
Educational, scientific, and research facilities,
Recreational facilities and Parks
Major population concentrations – transit stations, commercial centers

The inventories must include daily, hourly, and peak/maxima levels within the sensitive facilities

The Scoping Report and EIR/EIS must include modeling of noise generation and projections within 1000ft of any project elements in each alternative for both construction and operations. If modeling showed any increases within the initial zones, the zones should be expanded to the limits of any increases within and beyond the initial zones.

If noise levels are found to exceed those during the monitoring period, the Scoping Report and EIR/EIS must include, as part of mitigation for contained and open road facilities, noise absorption and reflective measures with treatment efficiency sufficient to reduce any alternatives' generation to equivalent to surrounding existing noise quality without project.

The Scoping Report and EIR/EIS must include adequate mitigation for any increases over the ambient noise levels by either controlling sources, interfering with noise transmission, or protecting sensitive receptors.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Air Resources - Vibrations

The Scoping Report and EIR/EIS must include a thorough and comprehensive monitoring of existing vibration levels at more than 20 different locations for each alternative at daily, hourly, and

instantaneous/peak (10 sec.) intervals within the project area and similar monitoring wherever modeled traffic, transit, or other vibration sources would increase over those at present. The Scoping Report and EIR/EIS must include inventory of all vibration sensitive land uses including but not limited to the following:

Medical, Senior Care, and Children Care facilities and complexes
Educational, scientific, and research facilities
Major population concentrations – transit stations, commercial centers

The inventories must include daily, hourly, and peak/maxima levels within the sensitive facilities

The Scoping Report and EIR/EIS must include modeling of vibration generation and projections within 1000ft of any project elements in each alternative for both construction and operations. If modeling showed any increases within the initial zones, the zones should be expanded to the limits of any increases within and beyond the initial zones.

If vibration levels are found to exceed those during the monitoring period, the Scoping Report and EIR/EIS must include, as part of mitigation for contained and open road facilities, vibration absorption and isolation measures with treatment efficiency sufficient to reduce any alternatives' generation to equivalent to surrounding existing vibration regimes without project.

The Scoping Report and EIR/EIS must include adequate mitigation for any increases over the ambient vibration levels/regimes by either controlling or isolating sources, interfering with vibration transmission, or protecting/isolating sensitive receptors, facilities, and equipment.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Cultural, Archeological, and Historic Resources

Approximately 10 years has passed since Caltrans completed an updated survey of historic resources in Pasadena. Obviously, a large number of additional structures will have reached the 50-year mark and will need to be researched.

Because of the potential adverse impacts on possible National Register eligible properties, the Scoping Report and EIR/EIS must include a careful and thorough historic survey within 1000ft of any proposed facilities or alternatives of the Project under consideration. The survey of historic properties must be done by an experienced historic preservation consultant – and in cooperation with State Office of Historic Preservation, Pasadena Heritage, South Pasadena Preservation Foundation and Los Angeles Conservancy.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Hazards - Accidental, Natural, and Targeted Events

The Scoping Report and EIR/EIS must include a full and thorough inventory, analyses, and assessment of hazards from accidents, natural events, and targeted events ("events") that could be expected during both construction and operations of any "build" alternative. In general, events would generally correspond to the construction activities and duration, while operational events would generally correspond to the number and types of vehicles, not directly related to the distances and number of passengers or volume of materials moved. Accidents would be more numerous as the modes become mixed: motorcycles, sedans, SUVs, vans, mini-buses, full-buses, light and heavy pickups, long-distance buses, and 3,4,5,6-axled trucks, while flow/capacity generally related in a direct positive manner to accidents. Other targeted events relate to very different factors but would generally relate positively with

vehicular volume/flow and perhaps to larger vehicles with larger on-board fuel tanks.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include review of natural events, earthquakes, rain storms, droughts, wind storms, etc., for the Study Area which could be expected within the project operational life span, 50-100 years for major capital projects. The Scoping Report and EIR/EIS also must include review of human/urban events, traffic accidents, pedestrian suicide attempts, etc., for the Study Area which could be expected within the project operational life span, 50-100 years. As the latter occur on a daily basis,

As generally accepted, the Los Angeles Metropolitan area and the Study Area has historically had a few significant accidents within road tunnels as most "tunnels" are short and through-passage is rapid (seconds to minutes). As these accidents have occurred they could be considered as a minimum level of involvement and not a worst case event.

The Scoping Report and EIR/EIS must include review of accidental events, including a worst case of two light vehicles and two heavy duty vehicles with a total fuel spill of 150 gallons, and worst case natural events (e.g., >6R earthquake on the Raymond Hill or Alhambra Active Faults at depths of less than two miles with periods of 2 minutes) for any alternatives.

So far, no reported significant "targeted event" has occurred in California although many suitable targets exist.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include a base case intentional "targeted event" which can be based on the following:

- *Two light duty vehicles – moving through the project facilities each way (total: four vehicles)*
- *Each vehicle carries two drums of fuel in rear compartments with attached road flares*
- *Vehicles release their ignited road-flare on fuel drums onto pavement with maximum longitudinal grades and speed away, occupants vacate thru nearest emergency exits or sacrifice.*

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Landuse Compliance and Suitability

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all existing landuses and relationship of existing landuses and existing landuse plans for the Study Area. The inventory must also include all known transportation origin and destination studies related to the Study Area, including any origins, any destinations, and any pathways passing through any part of the Study Area. The inventory must further include all project landuse and demographic related growth during the current planning period up to 2035 and expected for the life of project, up to 2065.

Landuse growth beyond 2035 must consider the assumed costs and availability of fuels for goods and passenger transport by light and heavy duty vehicles compared to road and rail transits.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: SocioEconomics – Costs/Employment

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all existing and future CTs, MTA, and State properties within the Study Area and within 1000ft of any proposed facilities. As part of the inventory, all existing occupants, residents, and site workers must be interviewed and any cultural concerns, comments, and issues must be collected and incorporated into cultural assessment of existing conditions and how any particular project alternative may influence the cultural aspects of those involved in past and current property and community resources of public properties.

An inventory of all vacant and/or leased-rented properties must also include their current/2011 valuations and current revenues and expenditures.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventories of jobs and employment for heavy construction and for transit and vehicle operators and maintainers within the Study Area, Region, and County. Projected employment for Project related jobs must be quantified and located as to the Study Area, Region, and County.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include a full economic analyses of Study Area and Regional conditions and economic and employment resources and opportunities and given current conditions an assumed economic constraints of local, county, regional, and state resources for both the planning period to 2035 and the life of project period to 2065.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all tolled transportation facilities within LA County, SoCal/SCAG area, California, and the western US and their charges, lengths, capacity and Levels of Services.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: SocioEconomics – Environmental Justice

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all existing and future CTs, MTA, and State properties within the Study Area and within 1000ft of any proposed facilities and the ethnicity and income characteristics. As part of the inventory, all existing occupants, residents, and site workers must be interviewed and any cultural concerns, comments, and issues must be collected and incorporated into cultural assessment of existing conditions and how any particular project alternative may influence the cultural aspects of those involved in past and current property and community resources of public properties. The Scoping Report, Alternatives Analyses, and EIR/EIS must include an assessment of environmental justice issues within and amongst the State owned properties' tenants, renters, leasees, and occupants based on direct interviews and audited records and assessed conditions, valuations, and terms/conditions.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include comparisons of environmental property conditions amongst the various communities within the Study Area and assess whether preferential treatments have been administered for those involved.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory and assess the identified "Beneficiary Communities (areas or zones)" within the Study Area and LA County and quantify levels/estimates of transportation improvements. If improvements occur or are expected to occur beyond the Study Area, further studies and identification shall be required to inventory and assess

prospective improvements. If improvements are generally restricted to the Study Area or if portions of the Study Area (eastern vs western) show statistically significant differences, further studies of improvements vs ethnicity/incomes/employment must be undertaken.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Secondary, Indirect Impacts Growth Inducements

Either as a Freeway or Tunnel systems, any infrastructure transportation road improvements are to serve areas well beyond the limits of the improvements, and to integrate with other projects which are planned, underway, or completed as an overall program or system. Therefore by the very nature of roadway (infrastructure) projects, secondary and/or indirect impacts (both beneficial and detrimental) are generated for area outside of the direct project area.

The SR710 is such a project and will generated secondary and indirect impacts outside of the limits of the physical project. Some such impacts are further identified as "growth inducements" where the intentional or unintentional consequences of the project spur the development of currently undeveloped lands within the project's "service areas" (e.g., Altadena, La Crescenta, LaCanada-Flintridge, NE San Fernando Valley, Mint Canyon, Canyon Country, Palmdale, etc.).

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an inventory of all areas which will derive any discernible improvement of transportation conditions due to each Alternative both within and beyond the Study Area. Specifically special studies must focus on:

Ports of LA and Long Beach,
near dock areas south of I-5,
I-710 corridor (including 15,000ft either side) from the ports to I-10,
I-210 corridor (east and north, I-605 to I-5),
I-5 (I-605 – SR14) and SR14
High Desert Corridor and SR138

As the project's life extends throughout the current forecast period of the So.Cal.Assoc.Govts. and actually well beyond 50-100 years, major secondary growth inducement impacts can be expected as typical of any such roads project. As this particular project has been deemed so vital to the entire regional transportation region (e.g., entire San Gabriel Valley, 210 Corridor/Eastern San Fernando Valley, and Palmdale), the impacts of its implementation may have even more spectacular effects in the region and well beyond the 100 sq mi "Initial Study Area".
The Scoping Report, Alternatives Analyses, and EIR/EIS must include a thorough inventory, assessment, and beneficiary projections for all area related to any transportation systems passing through the Study Area. MTA/CTs may consider these areas for prospective beneficiary assessment for the costs of construction and operations and maintenance. Such areas must also be assessed for potential Environmental Justice issues.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure – General Transportation

The Scoping Report, Alternatives Analyses, and EIR/EIS must provide all transportation assumptions for the planning (2035) and life of project period (2065) for each Alternative:

Fuel Prices
Parking Prices
Parking/Unit Requirements
Labor costs
Origins/Destinations
Passenger and Goods projections

During the SR710 Conversations - Series 1 Sessions, the Public provide many transportation concerns and issues.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include individually reviewed, compiled, and assessed of the concerns as part of the general review of transportation and their relationships to each Alternative, include the following:

Freeway Butchery – Northern and Southern South Pasadena
Truck/HOV/Bus Ban on SR110
N/W Bound Trucks on I-210 Avoiding I-5 – AND >2% ROAD GRADE – NO CLIMBING LANES
NOISE/DIESEL ON BOTH SIDES
SR134/210 CONGESTION AND RAMP TAILBACKS – HOV/LOS F 330-630pm
SR110>OrangeGrove Freeway SR/Fremont/Columbia>Pasadena>710Stub SR110>Arroyo/Marengo
SAN GABR. VALLEY/MONTEREY HILLS COMMUTERS IN SINGLE OCCUPANT CARS
Lack of SCAG/MTA Coordinated Planning in Open/Transparent Manner – I-5/ExpressLanes
Lack of SCAG/MTA Coordinated Transportation Plan for Regional Rail/Road Commuter Routes
Lack of SCAG/MTA Coordinated Plan of Rail Transportation in Open/Transparent Manner
Lack of SCAG/MTA Coordinated Plan of Rail Transportation for Container Freight
Lack of SCAG/MTA Fuel Taxes and Plans for Transportation/Landuse Planning
Losses of DASH/MTA Feeder and Workers' buses - <25% San Gabriel Bus Commuters
Lack of SCAG/MTA Fuel Taxes and Parking Fees for Transportation/Landuse Planning
Inadequate Last Mile Transport feeders (DASH, etc.) and Pedestrian/Transit Villages/Centers.
W-E Commuters based on single occupancy vehicles – 95% on Huntington, Valley, and Figueroa
LA DoT pays for 85% of commuters from east of the 710 Corridor – Let the Beneficiaries Pay – Need congestion pricing zone for non-transit passengers = ExpressDistricts
Cheap downtown parking rewards single occupancy commuters, low income forced to transit
Past fuel prices supported single occupancy WSGValley vehicles and higher transport O&M for LACity; future much higher fuel prices must be reflected in transport
Lack of Connector Road to Mission Road, not Alhambra Ave., Shared Sacrifices.
Lack of Alhambra congestion reduction measures, purposefully making worst, to get ???
Lack of Fed, State, LACo funds = PPP + Traffic Assessment/Parking Districts + Congestion $20-Tolls.
Freeway Butchery – Via SR110 – Northern/Southern and SR710 Eastern/Western South Pasadena
–SR2, SR134, I-5, and I-210 –FarWest, SouthCentral, NorthCentral, East, & North
– I-10 City Terrace/Ramona Gardens - Marengo-CityTerr.-Ram.-Garvey
SR110 Truck/HOV/Bus Ban forces traffic to Figueroa and Huntington
Truck/HOV/Bus Ban on SR110 and Diversions to Figueroa, Monterey Road, and Fremont/FairOaks
SR110/Fremont/FairOaks/Garfield Congestion/Ramp-Tailbacks(OrangeGrove and FairOaks)
NO Arterial Management for Fremont, FairOaks, Garfield, Huntington, and Monterey Road
Orange Grove Freeway – Signals Synchronization for Pasadena/Fremont Thru Commuters (5-7%,
Huntington Freeway – Signals Synchronization for the Good of San Marino Commuters (5-7%, 2+)
Huntington and Monterey Rd Thru-Traffic Congestion Sacrifices Local TrafficMTA GoldLine – Disregard of At-Grade Crossings and Lack of Parking Poor ADA Compiance
Poor MTA Thru-Bus Routings Lack of Adequate Feeders/Shuttles – First/Last Miles Connections
Protecting N-S Route of Bus 258…Ridership/Productivity/Service
Poor MTA Thru-Bus Routings Lack of Adequate Feeders/Shuttles – First/Last Miles Connections
Lack of Local Feeders/Shuttles for NE/SW MultiFamily Villages - First/Last Mile Problems

Historic SoPas Isolation/Segregation from LA, El Sereno and Garvanza
Historic Separation/Isolation of Multi/Single Family Developments
LACK of CaHSRA Coordinated Plan of Routing/Stations in Open/Transparent Manner
Commuter GAPS - <10% Multi-Occupancies – Few Car/VanPools
Caltrans' GAP – SR2 and SR-134 why not Interstate Ranking
Truck/HOV/Bus Congestion on SR and Diversions to SR134/SR2/I-210
NO Arterial/2/134/I-5 Ramp Management- Colorado, Brand, SanFernando: Congestion/Tailbacks
Colorado, Brand, SanFernando, ArterialWays – Intersections and Signals Synchronization
SanFernandoRd ArterialWay – Signals Synchronization for the Good of Northern Commuters
Thru-Traffic Congestion Sacrifices Local Traffic

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Highways
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all infrastructure road systems and individually by segments of 5000ft each within the Study Area.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Local Roads
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all infrastructure
LACo Call for Projects 2007, 2009, 2011 and after

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Mainline Railroads
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all current Mainline Railroads, rights-of-way, facilities, and capacities within the Study Area and those transportation corridors related thereto. The inventory shall also include current status and information regarding all planned and prospective new facilities (e.g., GRID, SCIG, ICTF, Colton, Mission, and Taylor yards) through the planning period up to 2035 and those expected throughout the remainder of the Project's operating life to at least 2065. The inventory must be included for Alternatives Analyses in order to support development of Alternatives related to heavy rail systems for goods, services, and passengers.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Infrastructure Resources and Plans – Transportation – Rail Transit
The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all current infrastructure – rail transit, rights-of-way, facilities, and capacities within the Study Area and those transportation corridors related thereto, including prospective Gap Closures (e.g., North Gold Line to North Hollywood and Gold Line – North to South. The inventory shall also include current status and information regarding all planned and prospective new facilities (e.g., Gold Line, Orange Line, MetroLink, etc.) through the planning period up to 2035 and those expected throughout the remainder of the Project's operating life to at least 2065. The inventory must be included for Alternatives Analyses in order to support development of Alternatives related to transit rail systems for services and passengers, and perhaps goods.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS

RE: Infrastructure Resources and Plans – Transportation – Road Transit

The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all current infrastructure – road transit, mixed and dedicated rights-of-way, facilities, and capacities within the Study Area and those transportation corridors related thereto, including prospective Gap Closures. The inventory shall also include current status and information regarding all planned and prospective new facilities (e.g., integrated road/rail stations for Gold Line, Orange Line, MetroLink, transit villages, inter-modal connections [MTA 256 and Gold Line], etc.) through the planning period up to 2035 and those expected throughout the remainder of the Project's operating life to at least 2065. The inventory must be included for Alternatives Analyses in order to support development of Alternatives related to transit road systems for services and passengers.

4. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS

RE: Infrastructure Resources and Plans – Services – Sewerage and Drainage

The Scoping Report, Alternatives Analyses, and EIR/EIS must include inventory of all infrastructure utilities and services resources currently supporting the Study Area and those planned by State, County, and Local agencies at least through the regional planning period to 2035 and forecasted or expected throughout the typical capital project life of 2015-2065.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include all infrastructure utilities and services resources required by each Alternative and through comparisons of all Alternatives for the Project.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include comparisons of all infrastructure utilities and services resources required by each Alternative and available supporting existing and expected facilities and systems. If any alternative's utilities and services requirements cause the regional services ratios to fall below their levels of services without the Project, the Project alternative must include compensation/mitigation to raise service levels back to those expected without the Project.

5. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS

RE: Mitigations

The Scoping Report, Alternatives Analyses, and EIR/EIS each must include mitigation measures for each Alternative; however, without a defined base case alternative prospective mitigation measures, activities, and compensation cannot be readily defined. MTA/CTs must provide a reasonable opportunity for the Public to participate in the Alternatives Analyses in order to provide the opportunity for the Public to provide Scoping inputs for each Alternative of concern for the Public as this has not been available during the "Scoping" process, Series 3 sessions.

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS

RE: Alternatives – General

The Scoping Report, Alternatives Analyses, and EIR/EIS must include "all possible" transportation alternatives as emphasized throughout all Scoping Series 3, SR710 Conversations without any limits other than the Study Area figure. Therefore the Scoping Report and EIR/EIS must include the wider range of alternatives than those indicated in the NOP/NOI/Scoping listings of:

Route Neutral Surface and Subsurface Highway/Freeway
Heavy Passenger and Freight Rail Improvements

Bus and Light Rail System Improvements
Local Street Upgrades
Signal synchronization
Pedestrian and Bike Access Improvements
Traffic Management Systems
No Build

and then included all five Zones (Geotechnical/Technical Feasibility Study).

Throughout the NOP/NOI and all three series of SR710 Conversations, presentation included the federal court's review of the 1990s "Multi-Mode Low-Build" alternative which was judged not to have been adequately reviewed and appraised by CTs as part of the Federal jurisdiction.
The Scoping Report and EIR/EIS must specifically include updated Multi-Mode Alternatives even though not specifically listed by the NOP/NOI.

During the SR710 Conversations, Series 1, various "Considerations" included various additional Alternatives categories:

MultiMode Improved freeway ramp access from Foothill and LaTunaCanyon...
Freight on Rails - Improve Alameda Corridor and UP/BNSF thru SFValley to Palmdale
Fix Transit Gaps – Gold Line West Extension to Orange Line
and Rosemead/SR19 Gold Line North/South connector
Truck ban on I-210 due to road grades in excess of 2% - 710>134>I5

The Scoping Report, Alternatives Analyses, and EIR/EIS must include alternatives derived from the Series 1 Considerations.

The Scoping Report and EIR/EIS must include the following general categories of alternatives:

Tunnels with and without trucks
from SR710 South Stub to I-5, SR2, SR134, and I-210 and
from I-10 to I-210 east of Fremont Ave.
Based on MTA/PPP
Based on MTA/Parsons-Brinkerhoof Study and Geotechnical Study
Surface or Elevated Roadways with and without trucks
from SR710 South Stub to I-5, SR2, SR134, and I-210 and
from I-10 to I-210 east of Fremont Ave.
Surface and Elevated Highway Limited Connectors within the Study Area (1-2 miles)
MultiMode – Connector facilities and many other road improvements of existing facilities
MultiMode – Improvements of existing facilities without Connectors
BusRapidTransit – Road improvements focused entirely on improved bus movements
Multimodal transportation landscape of South Pasadena applied throughout the Study Area

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Subsurface Alternatives

Subsurface Alternatives herein do not include limited or extended "Cut-and-Cover" subsurface facilities as they are more similar to "subgrade" or "depressed section" surface freeways.

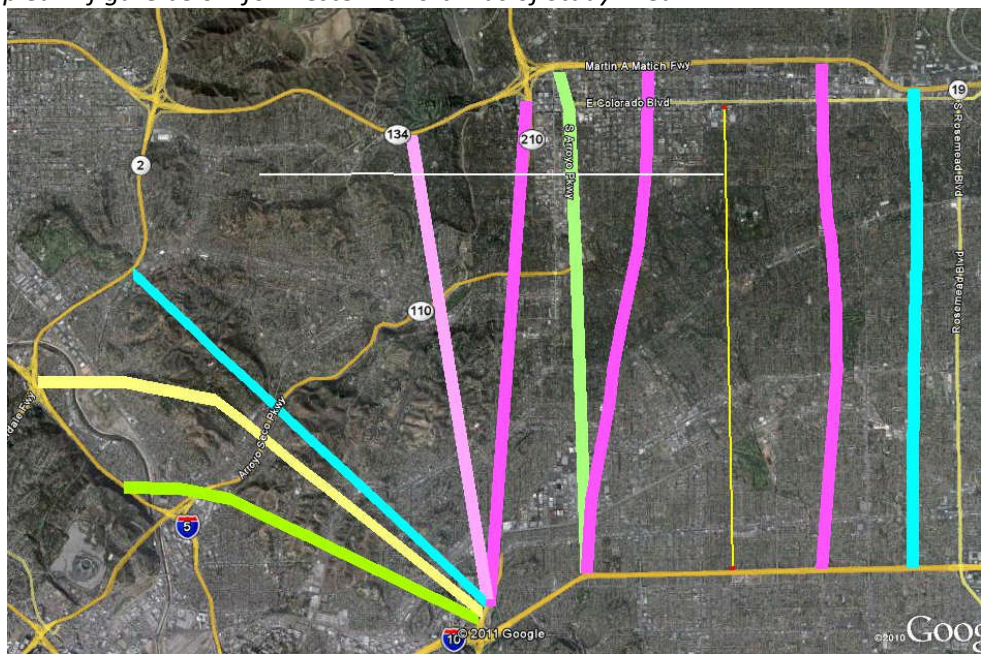
The Scoping Report, Alternatives Analyses, and EIR/EIS must include a wide range of possible subsurface road facilities, beyond those considered under the earlier 2006 and January 2011 conceptual designs for the "Meridian" tunnel route (through the Zone 3). The Scoping Report, Alternatives Analyses, and EIR/EIS must include the Meridian Tunnel Alternatives of MTA/PPP of 2010-11 and the MTA/P-B of 2006,

see figure below.

The Scoping Report, Alternatives Analyses, and EIR/EIS must include the following subsurface, bored/mined tunnel systems for the following corridors:

1. *Far West – I-10/I-710 to south end of Mt Washington and thence to I-5 (Zone 1, southern alignment);*
2. *West – I-10/I-710 to mid west side of Mt Washington and thence to the I-5/SR2 interchange (Zone 1, northerly alignment);*
3. *West-Central – I-10/I-710 to north end of Mt Washington and thence to equivalent of Ave 38 and Eagle Rock Blvd. (north of intersection with Verdugo, southern alignment in Zone 2);*
4. *West-Central – I-10/I-710 to SR134 at San Rafael Interchange, west of I-210 (far west alignment in Zone 3, West-Garvanza)*
5. *Central – I-10/I-710 to north stub end of I-710/I-210 (St.Johns/Pasadena north of California, central alignment in Zone 3, beneath Alhambra City);*
6. *PPP Item 2 January 2011 Tunnel of 21,000 ft total project and thereby Alhambra Ave to California Blvd., X2 - x3 TBM Diam. Covers, WITHOUT connector bridges and viaducts*
7. *P-B 2006 Tunnel of 21,000 ft total project from thereby Alhambra Ave to California Blvd., X2 - x3 TBM Diam. Covers, WITH connector bridges and viaducts to the existing I-710 Stub at Valley Blvd.*
8. *East-Central – I-10/I-710 to north end of SR110 at Glenarm thence to I-210 easterly alignment in Zone 3)*
9. *West-Far East – I-10 to I-210 (Zone 3* Palm/Marengo SR110-Arroyo)
10. *Central-Far East – I-10 to I-210 (Zone 4/5* San Marino)
11. *East-Far East – I-10 to I-210 beneath Rosemead SR19 (Zone 5)*

As exampled in figure below for western two-thirds of Study Area:



In all above subsurface alternatives, the Scoping Report, Alternatives Analyses, and EIR/EIS must include addition alternative subsets for the initial road alternative WITH and WITHOUT

Two-three times tunnel diameters for tunnel cover above the tunnel crown

Trucks and Truck Lanes and Truck Climbing Lanes
Ban Trucks of 3-4 axles and loads of 20,000 lbs gross – 3-4% Grades
Ban Trucks of 4-6 axles and loads of 40,000 lbs gross – 2% Grades
Tunnel covers of times two and times three
"Bus Rapid Transit" HOV lanes
South Portals entirely south of Valley Blvd.
*South Portals entirely south of I-10***
North Portals entirely north of California Blvd.
North Portals entirely north of I-210

***The EIR/EIS must include tunnel alternatives with portal beginning and ending south of I-10 and with tunnels beginning from the south side of I-10, leaving the existing south I-710 Stub with minor modifications for Hellman Ramp/Interchange and for Connector from Valley to West Mission Rd. in Alhambra.*

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Surface Alternatives – At Grade to +20ft above to -20ft below ground levels

Development of surface alternatives is based on the basic approach of "Let those who benefit provide the corridor and endure the solutions". As established at present and future, congestion on N-S arterials lies primarily within the city of Alhambra and thereby surface alternatives must lie within Alhambra on the south and Pasadena on north and may pass through San Marino and/or South Pasadena. No alternatives should be routed through adjacent communities without demonstrated and approved significant community benefits.

The Scoping Report Alternatives Analyses, and EIR/EIS must clearly include those surface alternatives which achieve the needs and purposes within those areas where congestion relief and other improvements are required or realized. Similarly alternatives must be excluded where those alternatives benefit communities beyond the project implementation areas while inflicting impacts on communities which do not realize benefits.

The Scoping Report Alternatives Analyses, and EIR/EIS must include the following N-S Full length (I-10 to I-210) surface alternatives:

West-Alhambra - Fremont /SR110 Corridor with interchanges at
Alhambra City - Mission Rd./Main
South Pasadena - Huntington Drive or SR110
Pasadena – California Blvd.
Central-Mid Valley Corridor (New-San Marino-Ramona-Greenwood, 7mile Road w of I-605 and e of SR2) with interchanges at
East Pasadena
East of Huntington Library
San Gabriel /W.Rosemead
Monterey Park (I-10)
Montebello (SR60)
Rosemead/SR19 – I-210-SR60 with interchanges at
I-10
Mission Road
Huntington Drive

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Viaduct/Elevated Highway Alternatives (20-35ft height)

The Scoping Report, Alternatives Analyses, and EIR/EIS must include full length elevated alternatives along the same routes from I-10 to I-210:

West-Alhambra - Fremont /SR110 Corridor with interchanges at
Alhambra City - Mission Rd./Main
South Pasadena - Huntington Drive or SR110
Pasadena – California Blvd.

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East Pasadena
East of Huntington Library
San Gabriel /W.Rosemead
Monterey Park (I-10)

Rosemead/SR19 – I-210-SR60 with interchanges at
I-10
Mission Road
Huntington Drive

Such elevated viaducts have been constructed in many California and other states, such as -
http://thei81challenge.org/cm/ResourceFiles/resources/Austin.pdf

I-81, Austin http://www.texasfreeway.com/Austin/photos/183/183.shtml

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Viaduct/Elevated/Surface "Connector Roads" Alternatives

The Scoping Report, Alternatives Analyses, and EIR/EIS must include an intermediate Build-Project Alternative including numerous highway connector elements between existing highway elements but not connecting the full N-S dimension of the Study Area; these must include as a minimum:

West- South End - Alhambra City
Mission Rd. and separately or combined-Mission-Meridian-Main/Huntington Drive

Hellman-CSULA
Hellman-Fremont (North and South of I-10)
Valley-Palm/Mission-Palm/Main-Marengo/Alhambra Road

West-North End – Pasadena
SR110-Arroyo-I-210
SR110-SR710 North Stub

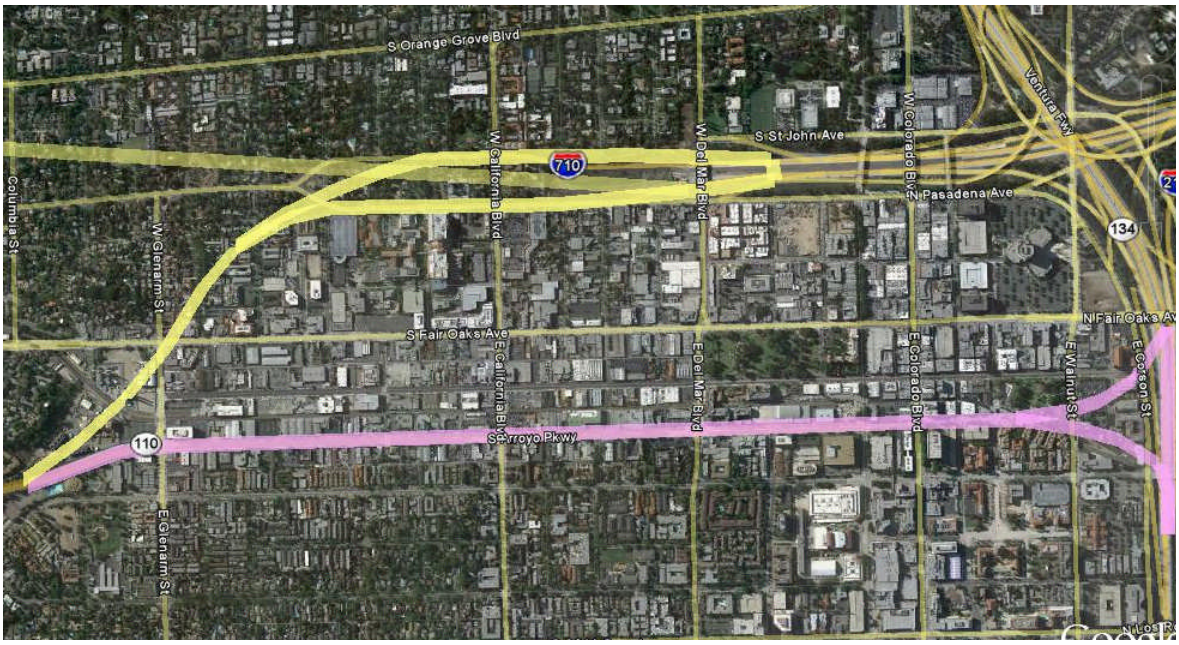
Other prospective Connectors:

Central-Mid Valley Corridor
East Pasadena – I-210 to Huntington
San Gabriel /W.Rosemead – I-10 to Mission
Monterey Park – I-10 to Garvey

Rosemead/SR19 –
I-210 to Huntingtont
I-210 to Foothill/SierraMadre
I-10 to Mission Road/LasTunas

South Connectors

North Connectors



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Tunnel covers of times two and times three
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The Scoping Report Alternatives Analyses, and EIR/EIS must include the following N-S Full length (I-10 to I-210) surface alternatives:

West-Alhambra - Fremont /SR110 Corridor with interchanges at
- *Alhambra City - Mission Rd./Main*
- *South Pasadena - Huntington Drive or SR110*
- *Pasadena – California Blvd.*

Central-Mid Valley Corridor (New-San Marino-Ramona-Greenwood, 7mile Road w of I-605 and e of SR2) with interchanges at
- *East Pasadena*
- *East of Huntington Library*
- *San Gabriel /W.Rosemead*
- *Monterey Park (I-10)*
- *Montebello (SR60)*

Rosemead/SR19 – I-210-SR60 with interchanges at
- *I-10*
- *Mission Road*
- *Huntington Drive*

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- *East of Huntington Library*
- *San Gabriel /W.Rosemead*
- *Monterey Park (I-10)*

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RE: Viaduct/Elevated/Surface "Connector Roads" Alternatives

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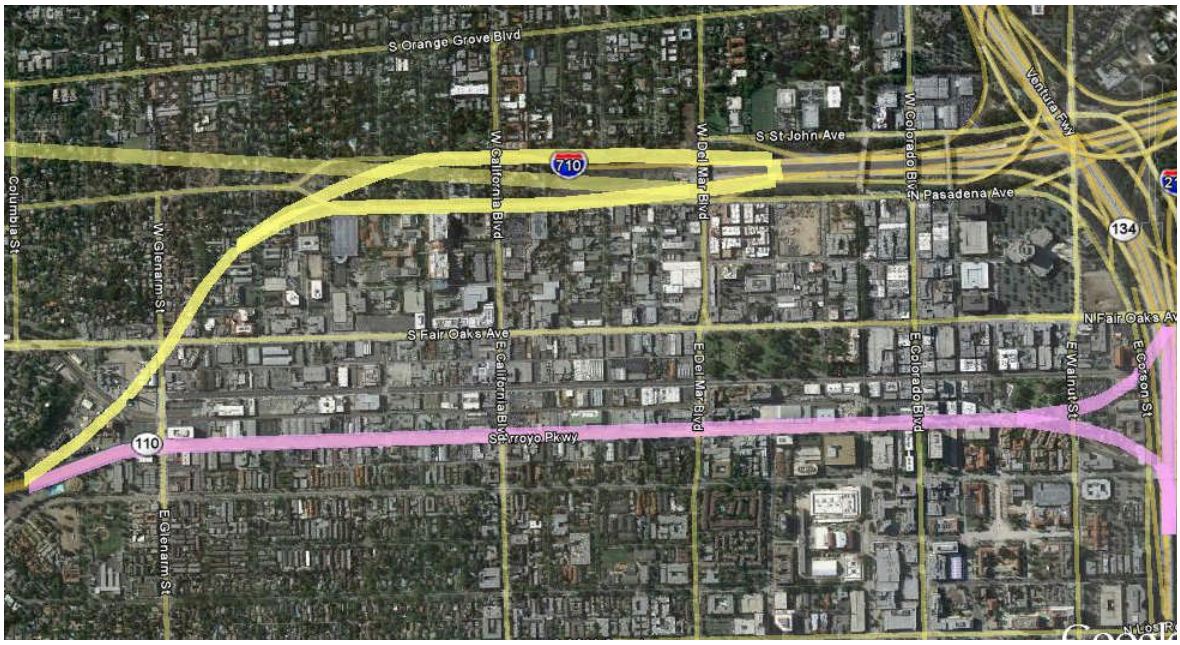
- *West- South End - Alhambra City*
  - *Mission Rd. and separately or combined-Mission-Meridian-Main/Huntington Drive*
  - *Hellman-CSULA*
  - *Hellman-Fremont (North and South of I-10)*
  - *Valley-Palm/Mission-Palm/Main-Marengo/Alhambra Road*
- *West-North End – Pasadena*
  - *SR110-Arroyo-I-210*
  - *SR110-SR710 North Stub*

Other prospective Connectors:

- *Central-Mid Valley Corridor*
  - *East Pasadena – I-210 to Huntington*
  - *San Gabriel /W.Rosemead – I-10 to Mission*
  - *Monterey Park – I-10 to Garvey*
- *Rosemead/SR19 –*
  - *I-210 to Huntingtont*
  - *I-210 to Foothill/SierraMadre*
  - *I-10 to Mission Road/LasTunas*

South Connectors

North Connectors



6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Bus Rapid Transit Alternatives/Multi-Occupancy Only Alternative

The Scoping Report Alternatives Analyses, and EIR/EIS must include Bus Rapid Transit (BRT) systems for both N-S and E-W corridors.

In all above surface and elevated road alternatives, add a second alternative for the initial road alternative with a dedicated "Bus Rapid Transit" facility, and the BRTan additional alternative set for the following E-W corridors:

Marengo-City Terrace-Garvey
Main-Valley
Mission Road-Huntington Drive
Broadway-Figueroa-Monterey Road
Spring-San Fernando Road-Eagle Rock-Colorado

The BRT facility must include:

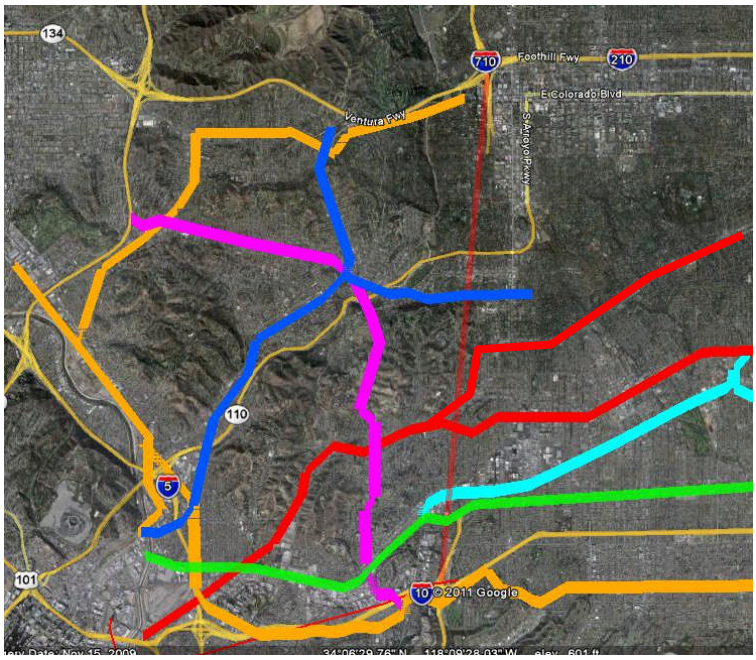
Upgrade curb lane – smooth surface, adjusted lane and curb curvature, driveway controls, overhead clearances for trees, wires, and signage
Signal Synchronization and Transit Signal Over-Rides
Out-of-Lane Stops and Stations
Integrated Multi-Road Transit Stations
Integrated Park-N-Ride Transit Stations

As a separate road alternative or as enlargement part of any MultiMode Alternative, add an alternative including fully dedicated bus-lane/BRT Corridor facilities along:

San Fernando Road-Eagle Rock Blvd.-Colorado as two-way SW-NE facility
Fremmont/Palm-Marengo as one-way couplets N/S facility
Garfield/Atlantic as one-way couplets N/S facility
Rosemead as two-way N/S facility
Valley – Main/Mission to Peck Road
Mission-Huntington Drive – Chavez to BuenaVista/Duarte

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Multimode Alternatives (including Transportation System Management)

The Scoping Report Alternatives Analyses, and EIR/EIS must include the following Multi-Mode systems for the illustrate ten-plus E-W and N-S corridors, see figure below



The Scoping Report, Alternatives Analyses, and EIR/EIS must include and develop a multimode approach consistent with those of MoveLA/FAST/Rand, South Pasadena, and others which usually involve several basic elements

Get Goods and Passengers on Rail
Get goods off the roads
Get passengers in multi-passenger road vehicles
Make streets, roads, freeway operate smarter – higher consistent flows
Increased passenger miles with fewer vehicles
Reduced peak-hour speeds but increased vehicle/hour and average daily trips
Price route and destination and origin parking to reflect true costs to the Public
Price fuel to reflect true environmental and infrastructure costs and impacts

MTA/CTs must include review of and assessment of application to LACounty in European urban plans to remove most light duty gas/diesel fueled individual-passenger vehicles from cities by 2035 and all individual-passenger vehicle by 2050.

The Scoping Report Alternatives Analyses, and EIR/EIS must include Important Components as well as many others:

Freight *"Zero Port Road Freight 2035"*

Gaps – BNSF/UPRR>LOSSAN > High Desert Corridor and SanLuisObispo

Passengers

Rail Transit Systems

NE-RedLine Extension through Glendale
GoldLine West Extension-Glendale/Burbank/N.Hollywood
GoldLine East Grid – Whittier/Azusa N-S CrossLink

Road Transit Systems

Make Streets Work Better

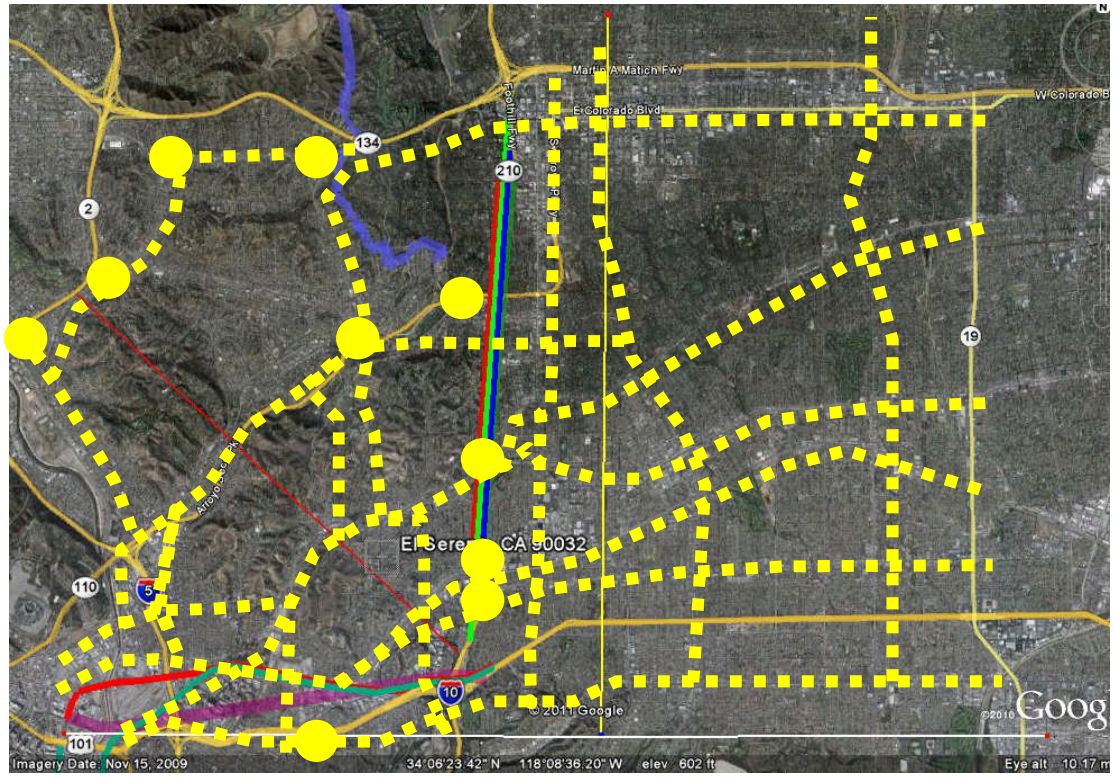
Road Efficiencies
Demand Management

Parking Management

Free 1-3 hr retail parking

$25/car space-day – W of I-5, N of Slauson, E of Vermont, S of Los Feliz

Park-N-Ride – Parking Zone Perimeter of LA City as shown as example below:



Congestion Pricing for access to areas west of Par-N-Ride facilities

Similar to District Pricing (London, Singapore, HongKong, Dubai, etc.)

State/Local Registration – Full Cost Recovery for all vehicles in Study Area

LA County Fuel Taxes for a minimum of $5/gal – Gas and Diesel

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From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 14, 2011 1:46 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#68]

Name *	Betty Shaw
Email (you@email.com) *	twokos@aol.com

Phone Number	(951) 990-1599
Address	1424 Oneonta Knoll South Pasadena, CA 91030 United States
Select a Subject *	Comment for scoping record
Comment *	Don't let the 710 proceed without hearing from the people, consulting at length with Envionmental Impact and Air Quality Control Groups. An extension will negatively impact several charming communities with noise, pollutants, debris and will most likely negatively affect property value for many home owners.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 14, 2011 1:54 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#69]

Name *	Raub Mathias
Email (you@email.com) *	raubmath@netscape.net
Phone Number	(626) 445-7305
Address	816 Coronado Dr Arcadia, CA 91007 United States

Select a Subject *	Comment for scoping record
Comment *	The fact is that there remains a critical gap in our freeway system that needs to be completed. Non-freeway alternatives are NOT the solution. There is no practical reason to completely tunnel this project when the surface right-of-way has already been obtained. Missing from most plans to complete the gap is the lack of an off/on ramp at Huntington Dr., the major artery for East/West surface traffic. Fill in the gap, but do it right.

From: Janka, Bahman [mailto:bjanka@cityofpasadena.net]
Sent: Thursday, April 14, 2011 3:34 PM
To: Ron.Kosinski@dot.ca.gov; SR710Conversations
Cc: Dock, Fred; Beck, Michael; Bertoni, Vince; Paige-Saeki, Jennifer
Subject: City of Pasadena's Scoping Comments for Draft EIR/EIS for the 710 Gap Closure Project

Dear Mr. Kosinski:

Attached is the City of Pasadena's Scoping Comments for the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the 710 Gap Closure Project.

A copy of this letter is also being sent to your office via US Mail.

We appreciate the opportunity to participate in this process.

Bahman Janka, P.E.
Transportation Administrator
City of Pasadena
Department of Transportation
Tel: (626) 744-4610
Fax: (626) 396-8693
E-mail: bjanka@cityofpasadena.net

DEPARTMENT OF TRANSPORTATION

April 14, 2011

Via Email and US Mail

Ron Kosinsky, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 Main Street, MS 16A
Los Angeles, CA 90012

Re: Scoping Comments for Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the 710 Gap Closure Project

Dear Mr. Kosinski:

The City's of Pasadena's formal scoping comments for the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the 710 Gap Closure Project are provided on the attachment to this letter.

We appreciate the opportunity to participate in this process. If you have any questions or would like additional information, please contact me directly at 626-744-6450.

Sincerely,

F.C. Dock

Frederick C. Dock
Director of Transportation

c. Michael J. Beck, City Manager
Vince Bertoni, Director of Planning and Development
Jennifer Paige-Saeki, Senior Planner/CEQA Coordinator

enc. Attachment

221 East Walnut Street • Suite 210 • Pasadena, CA 91101
www.cityofpasadena.net/trans

ATTACHMENT

Process

a. The role of closing the 710 Gap in the context of improving regional mobility and accessibility in relation to the defined study area is extremely unclear. Without a more precise definition of what aspects of regional mobility and accessibility are to be improved, alternatives cannot be effectively developed or considered. To that end, the lead agency should document what aspects of regional mobility and accessibility are limited and to what extent is that due to the gap in the 710. Documentation should include, but not be limited to the following:

   - Analysis of freight flows on trucks with specifics about origin/destination that show how the gap on the 710 limits north-south or east-west goods movement
   - Analysis of regional commute travel by mode, with origin-destination studies that show how the gap on the 710 limits regional commute travel
   - Analysis of current users of the 710 Gap corridor (i.e., those exiting/entering the two stub ends of the 710) with origin-destination studies that show how these users would be affected by alternatives proposed for the corridor

   If the above analyses indicate that the aspect of regional mobility that is compromised is the segment of I-5 between I-710 and SR 134, then the study area should be redefined to include the areas proximate to possible alternatives to the I-5 corridor rather than focusing on the 710 Gap.

b. The EIR/EIS process should be structured so that the public is informed of findings at each milestone phase of the preparation of the EIR/EIS.

c. Because of the complexity of the 710 gap project, an exhibition center(s) should be established during the EIR/EIS review and comment period in addition to use of electronic media in order to facilitate public awareness of project components analyses, design features, activities, and so forth. Because of the magnitude of impacts associated with tunnel alternatives, such exhibit center(s) should be located in communities where the tunnel portals are proposed.

d. In order to facilitate public review and comment, EIR/EIS alternatives should be superimposed on aerial photographs showing the affected real estate. In addition, photorealistic visualization techniques should be used to provide images of the alternatives.

e. Regional agencies should assess the potential of freight-to-rail considerations to inform assumptions and networks in the traffic modeling process used for the EIR/EIS.

f. Regional agencies should provide detailed information on approved projects to improve truck activity on the regional network to inform the EIR/EIS process estimates of future truck volumes on the network in the defined study area.

g. Multi-modal and system management policies and related improvements should be incorporated in each EIR/EIS alternative under consideration since they influence capacity and mode share estimates. In particular multi-modal provisions should be defined as part of the proposed project's overall congestion management provisions.

h. For alternative(s) that include a tunnel, the multi-modal and system management aspects of the EIR/EIS should be comprehensive and specific in communities where portal locations are proposed. The multi-modal and system management aspects should address the City of Pasadena's adopted Mobility Element (part of the General Plan), which defines requirements that apply to specific streets throughout the community.

i. The EIR/EIS should define performance requirements that would be included in any Public Private Partnership implementation program.

j. The draft scoping document for the EIR/EIS should contain a glossary of terms so that all participants can be clear on the definition of terms.

Traffic analysis and impact assessment

a. Absent significant re-engineering and reconstruction of the 710/210/134 interchange, Pasadena will likely experience substantial increases of traffic on City surface streets caused by drivers seeking ways to get around the already congested interchange, especially during peak hours. The EIR/EIS should thoroughly investigate measures to mitigate the impacts on surface streets of traffic bypassing the interchange.

b. The EIR/EIS should fully analyze the changes in peak hour traffic on local streets in the vicinity of the proposed project. The EIR/EIS should prepare local area traffic modeling analyses for the following portions of the street system and use this information to define mitigation measures if necessary:

   - The EIR/EIS should analyze the impact on traffic conditions for major arterials in the City of Pasadena as well as the freeway network. Traffic volume issues will remain a concern throughout this study process and at a minimum, the analysis of traffic impacts on local streets should be fully analyzed and mitigation measures should be defined if necessary.

- The EIR/EIS should document the traffic impacts associated with the projected increase in traffic (both the number of cars and the percentage increase) on the 210 Freeway through northwest Pasadena and the 210 Freeway through East Pasadena and use this information to define mitigation measures if necessary.
- The EIR/EIS should document the traffic impacts associated with projected traffic expected to exit the freeway and travel on City streets in northwest Pasadena and East Pasadena and use this information to define mitigation measures if necessary.

c. To be consistent with regional plans, the EIR/EIS analysis should be based on the latest Southern California Association of Governments travel demand forecasting model and forecasts prepared for the most recent Regional Transportation Plan.

d. The EIR/EIS should report on technical findings and traffic impacts or benefits of an interchange at Huntington Drive and define traffic mitigation measures if necessary.

e. The EIR/EIS should include consideration of the closure of ramps leading to California Boulevard in Pasadena and identification of any alternate circulation routes or strategies.

Impact on Sensitive Uses

a. The EIR/EIS should fully analyze the impact on historical structures and sensitive land uses adjacent to alternatives such as schools, parks, and hospitals.

No-Build Alternative

a. The no-build alternative of the EIR/EIS should address the condition of the lands in the City of Pasadena that would be affected by not implementing the project and should include but not be limited to the following:

- Potential reversion of Pasadena Avenue and St John's Avenue to city streets
- Potential closure of the ramps to California Boulevard and identification of any potential alternate circulation routes or strategies
- Mitigation of the depressed portion of the freeway stub in Pasadena including installing a landscaped cap or deck over the depressed portion.
- Disposition of the residential properties and vacant property owned by Caltrans in the corridor

Alternatives That Involve Tunnels

a. The EIR/EIS should document case studies of similar tunnel projects around the world with an emphasis on a review of tunnel and highway construction projects in residential communities. Lessons learned from these types of programs should be

documented in the EIR/EIS and best practices should be incorporated into the project design and delivery.

b. The EIR/EIS transportation modeling analysis should incorporate relevant traffic studies of peak and non-peak hour traffic in the vicinity of the portals and if necessary develop mitigation measures.

c. The EIR/EIS should identify whether technology will be used to monitor the volume of traffic on the freeway and local street network and the composition of vehicle mix in the tunnel segment at any time.

d. The EIR/EIS should identify a limit on the amount of vehicles and the composition of the vehicle stream allowed in the tunnel at any time for safe operating conditions.

e. The EIR/EIS should define what traffic management and safety innovations are planned to minimize or eliminate congestion at tunnel toll collection locations, should toll collection be a part of an alternative.

f. The EIR/EIS should identify if vehicle identification tracking and cargo tracking technologies are being incorporated as part of the project. If truck cargos will be actively monitored using identification tracking and cargo tracking technologies the EIR/EIS should define how this would be done to minimize impeding the flow of traffic.

g. The EIR/EIS should investigate the feasibility of limiting or prohibiting truck traffic on 710, including but not limited to the following conditions:

- The EIR/EIS should analyze the feasibility of prohibiting trucks during peak commute periods from 6 a.m. to 9:30 a.m. and from 3:30 p.m. to 7 p.m.
- The EIR/EIS should analyze the feasibility of prohibiting trucks on the tunnel segment.
- The EIR/EIS should analyze the feasibility of limiting the numbers of trucks using the tunnel at any one time.
- The EIR/EIS should analyze the feasibility of limiting the length of vehicles or vehicle consists that use the tunnel.

h. The EIR/EIS should analyze the feasibility and impacts or benefits of providing access ramps in between portals, including a full interchange at Huntington Drive.

Tunnel Portal Areas

a. The areas of tunnel entry, refuge, evacuation passages, and ventilation shafts are critical components of any tunnel alternative. Because these aspects are so important, the EIR/EIS should conduct a thorough analysis of proposed locations taking into account comprehensive design considerations. This review should

assess how the adjacent infrastructure, land use, or topography influences planr and design of the project, potential impacts on sensitive land uses, and define mitigation measures to address the impacts.

b. The EIR/EIS should document and provide aerial photographs with alignment alternatives superimposed. Potential tunnel portals, areas of refuge within the tunnel, evacuation passages and ventilation shafts should also be identified.

c. The EIR/EIS should document examples of Context Sensitive Portal Design as c of the most important design components of the overall project. We believe that there are opportunities to design the tunnel to include a portal design that is sensitive to its immediate environment and these issues should be addressed fu the report and designs should be presented in public outreach meetings.

d. The EIR/EIS should include measures that could be incorporated into the design mitigate impacts at the portals. Such components should be considered at the ou as a necessary element of the project, not treated as an afterthought at a later d

e. As part of the portal mitigation review, consideration should be given in the EIR/E to the feasibility of installing a cap or deck over the depressed portion of the free to mitigate impacts at the I-710 stub portal site in Pasadena. Such consideration should be assessed during the design of alternatives in the event that particular tunnel engineering considerations are required.

f. The EIR/EIS should provide information on other tunnels in residential areas tha have undertaken measures to include sensitive portal design features. Objective are (1) to provide assurance that such measures can inform the design from the outset, even during preliminary stages, and (2) to ensure that design features an not precluded unintentionally due to late consideration.

g. The EIR/EIS should address whether technology will be installed at portal entrie screen for polluting vehicles and whether thermal detectors will be installed to identify unusual heat.

h. The EIR/EIS should address how over-height vehicles will be detected before th enter the tunnel.

Tunnel Ventilation

a. The EIR/EIS should document the general location of potential tunnel ventilation towers, their height, width, depth and the impact to any existing land uses where towers are proposed.

b. Any ventilation tower proposed as part of a tunnel option for the project will likely out of scale with the residential structures along the route. The EIR/EIS should

investigate use of a minimum number of towers interspersed along the alignment in order to minimize disruption to surrounding neighborhoods.

c. The EIR/EIS should analyze the need for and frequency of ventilation towers should trucks be limited or not be allowed in the tunnel alternatives.

d. The EIR/EIS should document how the exhaust that is emitted from the potential future ventilation towers will be treated and the resulting air quality impact assessments.

e. The EIR/EIS should document potential advances in technology that are likely to occur during the next 10 to 20 years which might alter design and operation of a tunnel especially in relation to the need for ventilation towers.

f. The EIR/EIS should document comparisons with other national and international tunnels that include exhaust towers documenting lessons learned and drawing from best practices.

Noise

a. The EIR/EIS should document the projected increase in vehicle noise along sections of the 210 Freeway which do not have sound walls (northwest Pasadena and East Pasadena).

b. The EIR/EIS should analyze the need for sound walls which can be constructed as mitigation measures to address noise impacts as well as reduce visual impacts of construction.

Tolls and Related Technology

a. The EIR/EIS should thoroughly analyze the affects of any proposed tolls, whether they will be imposed on autos, trucks, or both, and an analysis of potential diversion of auto traffic or truck traffic to adjacent city of county arterials as a result of the toll charge. The analysis should also include an investigation of toll charges for all day versus only peak hours as well as incentive pricing for high occupancy vehicles.

b. The EIR/EIS should analyze and document an "Order of Magnitude Toll Revenue and Level of Bonding Estimate" for an alternative that would impose tolls only on trucks.

Visual Impacts

a. The EIR/EIS should include an assessment of the visual impacts of all related structures including the portals, ventilation shafts and other physical facilities related to the alternatives under consideration.

Landscaping

a. The EIR/EIS should document how mitigation measures such as landscaping and barriers could relieve many of the visual and noise impacts of the portal area from the surrounding residential and commercial areas. The cost of such mitigation measures and any sound walls should be included as part of the project.

Health Safety and Security

a. The EIR/EIS should include a review of the design, construction, and operation of comparable recently constructed tunnels in the United States and other countries and incorporate best practices in the areas of prevention, mitigation, response, and recovery from manmade and natural disasters.

b. The EIR/EIS should define the design standards that are incorporated to address vulnerabilities to natural and man-made disasters

c. If a performance based design is proposed, the EIR/EIS should define how issues such as life safety, acceptable risk, and fire safety are being addressed.

d. The EIR/EIS should incorporate a Health Risk Analysis of the impact of constructing and operating a tunnel to address the I-710 gap.

e. The EIR/EIS should address whether specialized technologies and standards for monitoring and inspecting structural elements of alternatives are incorporated into the alternatives.

f. The EIR/EIS should address the range of surveillance equipment proposed for the alternatives.

g. The EIR/EIS should address lighting provisions including transitioning lighting at the portals to aid driver vision and the use of in-pavement lighting for vehicle distance, lane definition and edge delineation that improve safety and prevent crashes.

h. The EIR/EIS should define incident detection and deterrent technology for incorporation into the alternatives including sensors for heat, water intrusion, fire, explosion, etc.

i. The EIR/EIS should address the feasibility of using cameras to identify vehicles that damage facilities for the purpose of collecting for damages.

j. The EIR/EIS should identify all measures to for safe evacuation in the event of an emergency including a sound support in addition to lighted guidance signs, refuge areas, and evacuation passages.

k. The EIR/EIS should define the role of law enforcement and laws/regulations to promote effective response and recovery operations. In this regard, the communication procedures, equipment, and jurisdictional issues among law enforcement emergency responders and operations control center should be defined.

l. The EIR/EIS should evaluate the state of the art for fire, rescue, emergency medical and hazardous materials response technology and best practices for any alternative considered, especially if a tunnel alternative is considered. The EIR/EIS should address jurisdictional issues that may occur due to access limitations. The EIR/EIS should address training, procedures and equipment needed for the jurisdictions directly impacted *and their mutual aid departments and partners*. The evaluation of all equipment and procedures, with particular attention to communications technologies, should prioritize technologies and procedures that "future-proof" the recommended alternatives."

m. The EIR/EIS should evaluate the potential impact of limiting hazardous cargo within the project area. The EIR/EIS should also evaluate the state of the art for monitoring hazardous cargo within the project area to either support a limit, or to rapidly and automatically detect hazardous releases or other situations involving hazardous cargo."

Identify Utility Infrastructure Impacts

a. The EIR should identify any utility infrastructure (e.g., electrical generation, distribution and sub-transmission systems, water and sewer mains, pumping facilities, fiber optic lines, communications infrastructure, etc.) affected by the project."

b. "Pasadena Water and Power should be consulted, provided access to specific project information, and have input into the design process to minimize or mitigate impacts."

Construction Impacts

a. Construction impacts should be fully defined and should include identification of potential utility infrastructure displacement or access issues (e.g., ingress/egress from local power plant, substations, wells, etc) during construction.

b. Measures to minimize construction impacts should be addressed in the EIR/EIS. Mitigation measures to screen visual and noise impacts should be implemented prior to construction and provisions to manage air borne dust due to excavation and/or construction should be included.

c. The EIR/EIS should thoroughly investigate the visual and noise impacts throughout both the construction and operations phase of the project. Furthermore the EIR/EIS

should investigate how Craftsman design vernacular could be incorporated into walls that would screen residential neighborhoods in Pasadena from the freeway.

d. The EIR/EIS should analyze the vibration impacts during construction. The EIR/EIS should document the considerable construction impacts related to the drilling and boring equipment used to construct tunnels proposed for this project.

e. The EIR/EIS should document the construction impacts as a result of the lengthy period of time the portal area(s) will be used for staging of construction equipment and for hauling of excavated material.

f. The EIR/EIS should define staging areas and construction truck routes for hauling of excavated material and delivery of materials.

g. The EIR/EIS should define and document the total construction schedule for the project.

h. The EIR/EIS should thoroughly evaluate the potential for contaminated soil to be encountered within the project and the potential hazards related to the management thereof, especially if a tunnel alternative is considered.

i. The EIR/EIS should evaluate the state of the art for fire, rescue, emergency medical and hazardous materials response technology and best practices for the construction of any alternative considered, especially if a tunnel alternative is considered.

j. The EIR/EIS should address jurisdictional issues that may occur due to access limitations. The EIR/EIS should address training, procedures and equipment needed for the jurisdictions directly impacted and their mutual aid departments and partners.

Maintenance

a. The EIR/EIS should address provisions and schedules for tunnel inspection and how maintenance and/or rehabilitation of project elements will be conducted under full closure and partial closure conditions.

Project Cost and Financing

a. The EIR/EIS should analyze financial projections about the cost revenues available for the tunnel and identify whether innovations have been identified to promote service life and reduce operating costs.

b. The EIR/EIS should document any legislative efforts that the State of California, the Southern California Association of Governments, and the Los Angeles Metropolitan

Transportation Authority may undertake regarding the sale of related right-of-way property and the potential for applying any of the proceeds to the Route 710 project.

c. The EIR/EIS should document a cost/benefit analysis for the best alternative that will balance the need for traffic flow and mobility with cost effectiveness. It must also balance the environmental impacts to local communities.

d. The EIR/EIS should document the operating and maintenance costs associated with any alternative and define for each alternative the business plan for the upgrade or replacement of the equipment and information devices that are part of the project.

e. All mitigation included in the final EIR/EIS should be incorporated into the provisions for any Public Private Partnership developed for the project and the City of Pasadena should be allowed to review the provisions of any such partnership agreement prior to its execution.

f. The EIR should identify any utility infrastructure affected by the project and associated costs to relocate, replace, or repair. Pasadena's electrical distribution and sub-transmission systems may be affected by the construction of this project. To keep the City-owned utility whole throughout the project, Pasadena Water and Power needs to have access to specific project information and have input into the design process; that will ensure that adverse impacts are avoided, and that possible parallel projects or collocations are evaluated for potential cost savings that could accrue to either or both entities.

From: Nagami, Damon [mailto:dnagami@nrdc.org]
Sent: Thursday, April 14, 2011 3:38 PM
To: SR710Conversations; Ron_Kosinski@dot.ca.gov
Cc: Hugo Garcia
Subject: NRDC and ESOC's Scoping Comments Regarding the NOI/NOP of a Draft EIR/EIS for the SR-710 North "Gap Closure" Project

Dear Mr. Kosinski:

Attached please find the Natural Resource Defense Council and El Sereno Organizing Committee's scoping comments on the Notice of Intent to prepare a draft environmental impact statement and Notice of Preparation of a draft environmental impact report for what Caltrans is referring to as the SR-710 North "Gap Closure" Project. A hard copy of our comments will follow by U.S. mail.

Thank you for considering our comments.

Best regards,

Damon Nagami
Staff Attorney
Natural Resources Defense Council
1314 Second Street
Santa Monica, CA 90401
Tel (310) 434-2300
Fax (310) 434-2399

See next page for letter

Via U.S. Mail and Electronic Mail (sr710conversations@metro.net)

April 14, 2011

Mr. Ron Kosinski
Deputy District Director
Caltrans District 7
100 S. Main St.
Los Angeles, CA 90012

Re: Scoping Comments Regarding the Notice of Intent to Prepare a Draft Environmental Impact Statement and Notice of Preparation of a Draft Environmental Impact Report for the SR-710 North "Gap Closure" Project in Los Angeles County, California

Dear Deputy Director Kosinski:

On behalf of the El Sereno Organizing Committee ("ESOC"), a grassroots community-based organization from El Sereno whose mission is to advocate on behalf of the interests of the community in relation to the proposed 710 Freeway/Tunnel project, and the Natural Resources Defense Council ("NRDC"), a national, non-profit environmental organization with tens of thousands of members and activists in southern California, we submit the following scoping comments on the Notice of Intent ("NOI") to prepare a draft environmental impact statement ("EIS") and Notice of Preparation ("NOP") of a draft environmental impact report ("EIR") for what Caltrans refers to as the SR-710 North "Gap Closure" Project ("Project").

Our organizations have longstanding environmental justice concerns about building a freeway through the predominantly Latino neighborhood of El Sereno. ESOC was one of the named plaintiffs, and NRDC represented the plaintiffs as counsel, in the still-pending federal court lawsuit that alleged that the allocation of mitigation measures for the proposed 710 Freeway extension was racially discriminatory. *El Sereno Neighborhood Action Committee et al. v. California Transportation Commission*, No. CV-95-6106 (C.D. Cal. filed Sep. 13, 1995). If the Project moves forward now, no matter what form it ends up taking, it must not impose disproportionate environmental and housing burdens on the minority community of El Sereno. At a minimum, the EIR/EIS must consider and carefully analyze and mitigate any and all environmental justice impacts.

We also wish to express our dismay at the woefully inadequate outreach efforts that the Los Angeles County Metropolitan Transportation Authority ("Metro") has made thus far to the El Sereno community with respect to the Project. Located immediately north and west of the

Natural Resources Defense Council
1314 Second Street
Santa Monica, CA 90401
310-434-2300

El Sereno Organizing Committee
5302 Borland Road
Los Angeles, CA 90032
323-222-6625

intersection where SR-710 meets Valley Boulevard, El Sereno includes neighborhoods that will be directly and heavily impacted by the Project. Metro's ineffective attempts to include El Sereno residents in discussions about the Project have failed to live up to the agency's promises to involve "an education and public involvement program to seek both regional and community-based solutions that are suggested by you, your friends and family, your neighbors, and everyone else in your community."[1] This is unacceptable and contravenes the basic principles behind the National Environmental Policy Act ("NEPA") and the California Environmental Quality Act ("CEQA"), which state unequivocally that public participation is an essential part of the environmental review process. We are bringing this issue to Caltrans's attention now to ensure that these problems are fixed before the next round of community engagement on this Project.

In addition, we continue to strongly oppose all surface or tunnel highway alternatives for the Project. We are extremely concerned about the environmental and public health impacts that would result from building a five-mile highway or tunnel in this location. We also believe that the immense financial outlay necessary to fund a tunnel or surface route would be much more effectively directed toward transit investments and improvements across Los Angeles County. We believe, therefore, that it is essential that Caltrans not only fully assess and mitigate the significant impacts from the proposed Project under NEPA, CEQA, and their regulations, but also seriously consider other alternatives to the Project, including no project at all. We are encouraged that Caltrans is now taking a fresh look at the regional congestion problem and considering "heavy rail and bus/light rail systems, local street upgrades, [and] traffic management systems" as potential Project components. We would support a multi-modal alternative that included these components, rather than a highway or tunnel that would exacerbate the region's intractable air pollution and resultant health problems while doing nothing to reduce traffic congestion. We would not, however, support any multi-modal alternative that includes a connector road feature that would extend the freeway from its existing terminus at Valley Boulevard to Alhambra Avenue.

Finally, the EIR/EIS needs to address all of the adverse impacts the Project will have on the natural and human environment, including, but not limited to, impacts on air quality, cultural and historical resources, biological resources, water quality and supply, local and regional transportation patterns and traffic circulation, greenhouse gas emissions, and regional water infrastructure. The EIR/EIS also must propose adequate mitigation measures, include a comprehensive discussion of alternatives, and address the Project's compliance with other laws as required under NEPA and CEQA. With that in mind, our comments below focus in greater detail on a discrete few of the most critical issues that we want to make sure are fully considered by Caltrans.

1. **The EIR/EIS must consider, analyze, and mitigate any and all environmental justice impacts.**

We are troubled that neither the NOP nor the NOI contains any references to evaluating or mitigating environmental justice impacts, despite the fact that achieving environmental justice

[1] Metro, "SR-710 Conversations," at http://www.metro.net/projects/sr-710-conversations/.

has been made a priority for federal agencies by presidential decree. Exec. Order No. 12,898, 59 Fed. Reg. 7,629 (Feb. 16, 1994). What this means is that each federal agency is charged with incorporating environmental justice into its mission by "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States." Indeed, the Council on Environmental Quality ("CEQ") issued guidance in 1997 to assist federal agencies in carrying out this very mission.

As mentioned above, any highway route would cut through, and any tunnel route would begin extremely near, El Sereno, a neighborhood that already experiences high levels of mobile and stationary source emissions known to be toxic. The California Air Resources Board has observed that "Californians who live . . . along high traffic corridors are subsidizing the goods movement sector with their health."[2] Of particular concern are the adverse health effects of diesel emissions, dramatically increased local levels of which would be implicated by the construction and operation of a new highway or tunnel. The EIR/EIS must consider and implement mitigation measures to eliminate all environmental justice impacts implicated by the proposed Project, taking into account impacts introduced by the Project itself as well as cumulative impacts that arise from existing and foreseeable future sources of air, light, and noise pollution, including the tremendous increase in car and truck traffic that any highway Project alternative would facilitate.

We urge Caltrans to consult CEQ's guidance documents, consider and analyze the Project through the lens of addressing environmental justice issues, and implement mitigation measures to eliminate any and all environmental justice impacts implicated by the Project.

2. Caltrans and Metro must rectify their recent and historical failures to include the El Sereno community in the public participation process.

Both NEPA and CEQA require agencies to ensure and facilitate adequate public participation in the environmental review process. *See, e.g.*, 40 C.F.R. §§ 1500.1(b) (requiring NEPA procedures to "[e]nsure that environmental information is available to public officials and citizens before decisions are made and before actions are taken"), 1500.2(d) (requiring federal agencies to "[e]ncourage and facilitate public involvement in decisions which affect the quality of the human environment"); *see also Concerned Citizens of Costa Mesa v. 32nd Dist. Agric. Ass'n*, 42 Cal. 3d 929, 936 (1986) (stating that members of the public hold a "privileged position" in the CEQA process, reflecting "a belief that citizens can make important contributions to environmental protection and . . . notions of democratic decision-making"). Thus far, however, Caltrans and Metro have failed in carrying out this charge with respect to the El Sereno community.

The undersigned organizations first documented Metro's inadequate outreach efforts in a letter to Los Angeles City Councilmember José Huizar, dated March 3, 2011 and attached hereto

[2] *See* Cal. Air Res. Bd., Draft Emission Reduction Plan For Ports And International Goods Movement In California, Ch. 5, at 1, (Dec. 1, 2005).

for reference. In that letter, we pointed out the extremely low turnout of El Sereno residents at the "Series 1" community meeting in El Sereno on February 24, 2011, and explained that this actually is a recurring problem for this community with respect to this Project. We also suggested that Metro's repeated outreach failures to El Sereno are a systemic problem, illustrated by examples like the agency's insistence on directly translating into Spanish the ambiguous and uninspiring title of the "Series 1" meetings ("Transportation: Where Have We Been? Where Are We Going?"). This title was hopelessly vague and provided little to no context for the important discussions the meetings had hoped to facilitate. Finally, we asked for a meeting with Metro's principals, their outreach consultants, and elected officials including Councilmember Huizar to ensure that El Sereno residents have a real opportunity to participate in public dialogue regarding the Project.

The meeting we requested did not happen. In the meantime, Metro convened the "Series 2" (CEQA/NEPA on March 17, 2011) and "Series 3" (Scoping on March 29, 2011) community meetings in El Sereno. At those meetings, in addition to running into similar issues as those raised in our March 3rd letter, members of the El Sereno community experienced additional concerns and frustrations related to this project, as described below.

a. ***Lack of community engagement:***

Metro had the same low turnout at the "Series 2" (CEQA/NEPA) meeting as it had at the "Series 1" (Conversations) meeting, despite the outreach consultants' promises that they were doing everything they could to get the word out. The El Sereno Organizing Committee, community residents and representatives from the LA-32 Neighborhood Council voiced their concerns about the low turnout during public comment.

b. ***Poor overall project planning:***

The 20 total "Series 1-3" meetings were hastily planned and scheduled too closely together. This type of planning lends itself to problems associated with ineffective outreach as meetings were scheduled in many cases back to back, in different cities, on consecutive dates.

c. ***Confusion over what is the "project":***

The "project" that the meetings were supposed to be about has never been defined, which continues to confuse people. Several comments were made expressing confusion with understanding what is being communicated in relation to the "project." Because of the vague and ambiguous explanations provided by the presenters, the community was very dissatisfied and unclear on what they should be commenting about at the Scoping meeting.

d. Questionable execution of community outreach:

Towards the end of the CEQA/NEPA meeting in El Sereno, a representative from the outreach consultant, Diverse Strategies for Organizing ("DSO"), read off a lengthy laundry list of targeted outreach efforts in El Sereno. This list included several community organizations, elected officials, the El Sereno Chamber of Commerce, school principals, churches, Barrio Action, El Sereno Stallions, El Sereno Recreation Center, the Voice newspaper, and the Senior Center, and also stated that flyer distribution at schools was pending clearance by the school bureaucracies. However, while the consultant was touting its "comprehensive outreach efforts" in El Sereno, residents were complaining about the consultant's failed efforts, as evidenced by the poor turnout.

It was clear to the community that the consultant had embarked on a poorly conceived and ineffectual outreach strategy, which resulted in a failure to engage the community of El Sereno. The consultant's descriptions of its outreach activities have been vague and incomplete, which, along with the poor turnout at two consecutive public meetings, led the community to the conclusion that the consultant's efforts were inadequate in their scope, planning and execution. To provide just one example, on March 17, 2011, the consultant finally sent out a flyer for the "Series 2" meeting. This flyer was transmitted via email at 1:24 PM, the same day of the "Series 2" meeting, approximately 4½ hours prior to the scheduled meeting time.

e. Failure by the outreach consultants to develop a strategic outreach plan:

The consultant's meeting flyers were unimaginative and generic, and contained uninspiring institutional text, layout and graphics. The flyers lacked any sense of need, importance, or urgency – characteristics essential to drawing the community to attend these meetings. The flyers did not even attempt to appeal to the specific concerns of the varying communities that were being targeted. There was no effort to consider messaging that would appeal to the diversity in demographics, especially as it relates to El Sereno. This revealed a serious lack of perception and understanding of the historical concerns that relate to a predominantly Latino community like El Sereno, versus non-Latino communities like South Pasadena and Pasadena.

Addressing linguistic concerns is another part of a successful strategic outreach campaign. Up until the consultant's untimely flyer on March 17th, there was no targeted outreach to monolingual, Spanish-speaking residents in El Sereno. This is of paramount concern. According to U.S. Census figures, in El Sereno, a predominantly Latino community with approximately 48,000 residents, there are approximately 79.4% "Language other than English" and 67.5% "Spanish-speaking language" households. This is particularly true of census tracts running along the proposed SR-710 Freeway surface and tunnel routes. Indeed, from a strategic standpoint, both Metro and the consultant utterly failed in determining that it was appropriate to wait to outreach to the Spanish-speaking residents of El Sereno until the 14th of 18 planned meetings.

f. Improvement in outreach for the "Series 3" (Scoping) meeting was not enough:

Although members of the El Sereno community attended the March 29, 2011 "Scoping" meeting in far greater numbers, this result was only minimally due to the consultant's efforts. At the strong urging of ESOC, the consultant purported to "canvass" the 710 corridor. However, the consultant's canvassing consisted of the same, ineffective flyers and was simply a "walking-man" effort. The consultant did not knock on doors or attempt to actually engage the community.

Because of the consultant's largely ineffective outreach efforts, ESOC decided to canvass the 710 corridor on a volunteer basis. ESOC went to every property in the corridor, knocked on every door that could be accessed, and spoke with residents in English and Spanish urging them to attend the meeting. ESOC also met with business owners and organizations on Huntington Drive, Eastern Avenue and Valley Boulevard to arrange to leave flyers for residents to pick up. ESOC left flyers at a total of 66 locations, and observed the consultant's flyers only at about three locations. ESOC also inserted 4,000 flyers into the Voice newspaper so that El Sereno residents would receive it at the pending distribution and inserted flyers into the church bulletin at Guadalupe Church in Rose Hills for their five Sunday masses. This is what we believe constitutes strategic and effective outreach.

It is apparent that the consultant's principal and most sustained outreach strategy consisted of a barrage of emails during the week of the meeting. ESOC believes that while email is convenient for many people, it should not be the primary outreach technique for our community. It is difficult for us to believe that the Spanish-speaking community in El Sereno can be effectively engaged via emails, Facebook, Twitter and webcasts, when few residents receive news about the community through those outlets. We believe that the community's increased numbers at the "Series 3" scoping meeting was due to the effective and strategic outreach put forth by ESOC, and not the consultant. Several attendees confirmed this during the public comment period.

g. Disorganized CEQA/NEPA presentations:

The Metro staffers who presented information about the CEQA/NEPA process used PowerPoint flow charts that did not correspond to the CEQA/NEPA flow charts distributed to meeting attendees. When this was pointed out by the El Sereno Organizing Committee at the South Pasadena CEQA/NEPA meeting, the staffers promised that it would not occur at the upcoming El Sereno meeting. They failed to keep their promise. As a result, many in the community remain confused about the environmental process.

k. Lack of clarity regarding submission of public comments gathered by Caltrans during the community meetings on the Geotechnical Study, and their possible submission during the Scoping process:

A significant issue was raised by a community member in terms of public comments and the "Series 3" (Scoping) process. At issue was what was to become of all the public comments made and recorded at the substantial public meetings following Caltrans's Geotechnical Study in early 2009. The community was led to believe that those comments were recorded for a purpose. What happened to those comments, and will they become part of the Scoping record? Metro officials fumbled with a response and the El Sereno community was left unclear on this issue.

At the "Series 2" meeting in El Sereno, Metro's CEQA/NEPA presenter stated that "the most important aspect of CEQA is the public involvement process." However, that process means absolutely nothing when the community is not informed about the process and is not engaged in it. The El Sereno community deserves better than this. As such, we are submitting these comments into the administrative record to call attention to this problem and to demand an immediate and lasting solution. We also would like to reiterate our request for a meeting as soon as possible with appropriate representatives from Caltrans, Metro, Metro's outreach consultants, and the elected officials copied on this scoping letter to discuss the inadequacies of outreach efforts in the El Sereno community to date; arrange for an effective process to gather the El Sereno community's input on issues relating to the 710 Project; and collaborate to improve outreach for all future phases of this Project.

3. The EIR/EIS must contain an accurate and complete project description.

Courts have long held that "[a]n accurate, stable, and finite project description" is an essential part of an informative and legally sufficient EIR. *See, e.g., County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 193 (1977). An accurate project description is needed to provide agencies and the public with "an intelligent evaluation of the potential environmental effects of a proposed activity." *McQueen v. Board of Directors of the Mid-Peninsula Regional Open Space District*, 202 Cal. App. 3d 1135, 1143 (1988).

As related in Section 2(c) above, community members are thoroughly confused about what exactly constitutes the "Project." For example, while the NOP states that the Project "may include" one or more highway or non-highway components, the NOI refers in the Summary section to a "proposed highway project." Which is it? As shown in the reports above, Metro staffers failed to provide the El Sereno community with any clarity in the pre-scoping and scoping meetings, which disadvantaged community members who took the time to try to participate in those meetings. We urge Caltrans to clarify the project description before the next round of public participation and community engagement.

4. **The EIR/EIS must analyze greenhouse gas emissions.**

Caltrans must consider and analyze the effects of greenhouse gas ("GHG") emissions from the Project. The EIR/EIS must contain an analysis of the extent to which the Project significantly affects the "quality of the human environment," which includes air quality. 42 U.S.C. § 4332(2)(C); *see* 40 C.F.R. §§ 1508.8 (defining "effects" as including "ecological . . . , economic, social, or health [effects], whether direct, indirect, or cumulative"), 1508.14 (defining "human environment" comprehensively to include "the natural and physical environment and the relationship of people with that environment"); Cal. Pub. Res. Code §§ 21082.2(a), 21100(b)(1) (requiring that an EIR discuss all significant impacts of a project, and that the lead agency make a determination as to whether the project may have any such significant impacts); Cal. Pub. Res. Code §§ 21002, 21081(a) (requiring that an EIR adopt feasible mitigation measures to reduce or avoid all significant environmental impacts). Cumulative effects clearly include impacts from climate change. 40 C.F.R. § 1508.27(b)(7) (defining "significance" as including "[w]hether the action is related to other actions with individually insignificant but cumulatively significant impacts").

The National Academy of Sciences recently confirmed in the first of a suite of studies called *America's Climate Choices* that climate change is occurring, is caused primarily by human activities, and poses significant risks for a broad range of human and natural systems. This reflects the overwhelming consensus view by the scientific community, which earlier had prompted the CEQ to issue draft guidance in February 2010 on "the ways in which Federal agencies can improve their consideration of the effects of [GHG] emissions and climate change in their evaluation of proposals for Federal actions under the National Environmental Policy Act (NEPA)."

In addition, NEPA requires a discussion of "possible conflicts between the proposed action and the objectives of Federal, State, and local land use plans, policies and controls for the area concerned." 40 C.F.R. § 1502.16(c); *see also* 40 C.F.R. § 1508.27(b)(10) (defining "significant" as including "[w]hether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment"). The EIR/EIS, therefore, must evaluate the relationship between the Project's proposed GHG emissions and any relevant California GHG emission reduction laws or policies, including the Global Warming Solutions Act of 2006 ("AB 32"), through which California has committed to reducing GHGs to 1990 levels by 2020, and the 2008 Sustainable Communities and Climate Protection Act ("SB 375"), which mandates that regions examine GHG emissions associated with infrastructure projects.

Clearly, GHG and climate change impacts must be considered under both NEPA and CEQA. Thus, we encourage Caltrans to follow closely CEQ's draft guidance and CEQA Guidelines section 15183.5, and conduct a rigorous GHG analysis to evaluate and mitigate all of the Project's GHG impacts.

5. Conclusion

NEPA requires federal agencies to analyze the environmental impact of actions that "significantly affect the quality of the human environment," and CEQA requires agencies to "identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.'" We urge Caltrans to uphold these laws. In doing so, we believe Caltrans will conclude that there are many better ways to address southern California's traffic congestion problems than by spending several billion dollars on a five-mile freeway or tunnel that would devastate public health and environmental and historic resources in El Sereno and throughout the study area. In addition, we strongly urge Caltrans and Metro to take immediate measures to improve outreach efforts in El Sereno, including, but not limited to, convening the meeting our respective organizations requested above, so that members of the El Sereno community can fully participate in this process as envisioned and required under both NEPA and CEQA.

Thank you for your consideration of our comments.

Very truly yours,

Hugo Garcia
President
El Sereno Organizing Committee
Phone: (323) 718-1223
Email: hugogarcia1@sbcglobal.net

Damon Nagami
Staff Attorney
Natural Resources Defense Council
Phone: (310) 434-2300
Email: dnagami@nrdc.org

Attachment (March 3, 2011 Letter to Councilmember Huizar)

cc: Los Angeles City Councilmember José Huizar
Congressmember Judy Chu
Congressmember Xavier Becerra
Assemblymember Gil Cedillo
Senator Ed Hernandez
Senator Kevin de Leon
Los Angeles County Supervisor Gloria Molina
Michael Miles, Caltrans District 7 Director
Doug Failing, Metro Director of Highway Programs
Lynda Bybee, Metro Deputy Executive Officer for Regional Communications
Susan Gilmore, Metro Public Affairs
Mary McCormick, MBI Outreach Consultant
James Rojas, President, Latino Urban Forum

From: Darrell Clarke [mailto:darrclarke@gmail.com]
Sent: Thursday, April 14, 2011 4:06 PM
To: SR710Conversations
Subject: SR-710 Scoping Comments

SR-710 Scoping Comments

The following list of considerations for an **SR-710 "gap closure" tunnel** should be included in the Draft EIS process:

- A tunnel would become a **queue to already-very-congested connecting freeways**, e.g. p.m. northbound SR-710 to eastbound I-210.
- How would **concentrated exhaust** from ventilation towers impact neighbors?
- How many new vehicle miles travelled would be the **induced demand** from this facility? What would be their traffic, air pollution, and greenhouse gas emissions impacts?
- A tunnel would encourage **truck traffic up I-210** instead of I-5. Such incremental traffic impacts to existing freeway network beyond the project area must be included in the study.
- Tunnel construction has been proposed to be largely financed from toll revenues. A financial model is necessary to consider how many vehicles times what level of toll would be necessary, and whether it could ever be a **self-supporting toll facility**.
- Construction impacts of huge **dirt haul** from portals.
- Risks as a **security target** for terrorists.

Alternatives considered should include a wide array of alternative transportation modes and improvements such as: increased HOV, bus and rail transit, improved "complete streets" and intersection facilities, and transportation demand management.

Darrell Clarke
Conservation chair and Transportation co-chair
Sierra Club Angeles Chapter
3435 Wilshire Blvd. #320
Los Angeles, CA 90010

From: James Price [mailto:pingomingo@hotmail.com]
Sent: Thursday, April 14, 2011 10:26 AM
To: SR710Conversations

Subject: 710 Extension

Sir/Madam,

Nothing has been offered that can be seen as a legitimate reason for postponing the completion of the 710 Freeway.

For the sake of the people of Alhambra, South Pasadena, Pasadena, and other affected communities, I would urge the powers that be to resume construction of the 710/210 connection. This project has been held up, for no good reason, for quite a long time. Detractors have found no legitimate potential for detrimental impact. Noise? We all must put up with noise in the 21st Century. We need this freeway connection.

Jim Price
695 Busch Garden Drive
Pasadena, CA 91105

From: Valentino, Danielle [mailto:ValentinoD@metro.net] **On Behalf Of** SR710Conversations
Sent: Thursday, April 14, 2011 8:16 AM
To: 'adina catalanotti'; SR710Conversations
Cc: kevin chastain; thechefknows@yahoo.com
Subject: RE: NO TUNNEL

Adina and Greg:

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your physical address (along with your comment).

I do not see your physical address included in your submission below.

From: adina catalanotti [mailto:adinacatalanotti@yahoo.com]
Sent: Tuesday, April 12, 2011 8:21 PM
To: SR710Conversations
Cc: kevin chastain; thechefknows@yahoo.com
Subject: NO TUNNEL

RYFKM?

PLEASE DON'T LET THIS HAPPEN!!!!! DO NOT APPROVE THE TUNNEL PROJECT IT WILL RUIN THE LIFE THAT WE DESERVE AND THE HEALTH OF OUR FAMILIES AND FRIENDS IN THE

COMMUNITY

IF YOU WOULD LIKE TO SPEAK WITH ME IN PERSON, MY NAME IS ADINA CATALANOTTI AND I AM BLESSED TO LIVE IN BEAUTIFUL SOUTH PASADENA. I WORK AT THE LANGHAM HUNTINGTON PASADENA HOTEL AS A CLUB CONCIERGE, MY HUSBAND GREG NAPIER IS A RESATAURANTEUR AND HE RUNS THE ROXOLANA RESTAURANT AND WINE BAR IN OLD PASADENA

ADINA 818 3879 0380 LANGHAM # IS 626 585 6203
GREG AT ROXOLANA 626 792 0440

WE ARE VERY ACTIVE IN THE CULTURE AND BUSINESS OF SOUTH PASADENA AND PASADENA

DONT DESTROY OUR LOVELY CITY AND LIFESTYLE FOR GREED AND SELFISHNESS

GOD BLESS

ADINA

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 14, 2011 4:37 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#70]

Name *	Richard Gerrish

Email (you@email.com) *	richard.gerrish@dilbeck.com
Address	1499 Huntington Drive 100 south Pasadena, CA 91030 United States
Select a Subject *	Comment for scoping record

Comment *

The scoping study needs to include a study of alternatives other than tunnel or freeway. Such options could include various other routes and types of transportation including light rail and heavy rail as well as vehicular traffic dispersement patterns. Such ideas could include improving efficiencies for existing roadways by using computer controlled directional/traffic signals that adjust to high traffic loads and give prioriy to that traffic. Improved signage, which might also be led-computer controlled messages directing traffic to alternative routes during peak traffic times. Investment in this type of technology would probably be way less expensive than building a freeway or tunnel and may be a much more effective solution. In addition to traffic efficiencies, dispersion could also bring traffic into contact with local economies that could benefit from the that traffic. I am sure many of us can tell stories of the destruction of local busi ness districts caused by "by-passes" and freeways that have left small communities "off the map." The multimodal solution should receive at least as high, if not higher priority in this study. The cost for that kind of developement is likely to pencil out to be much less expensive, more effective, and with beneficial sides effects! If it is not studied with equal due diligence we won't know the real truth!

On closing, I am concerned that one governmental agency doing a study to decided if another governmental agency should receive funding to do something that is already on the books as a project strikes me as a case of the fox in the hen house. I am very concerned that this is a "push" to

get something done that should not be done!

From: Nat Read [mailto:nat@natread.com]
Sent: Thursday, April 14, 2011 9:14 PM
To: SR710Conversations
Subject: SR710 EIR Scoping comment letter

Please include this letter in the full EIR report. Thank you.

--

Nat B. Read
Read Communications
100 E. Corson St., Suite 200
Pasadena, CA 91103
Phone: 626-578-0705
Fax: 626-578-0706
www.natread.com
nat@natread.com

710 Freeway Coalition

100 E. Corson St., Suite 200, Pasadena, CA 91103

March 21, 2011

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

Re: 710 Gap Closure Project EIR

Dear Mr. Kosinski:

It seems that journalists are incapable of writing the phrases “710 Freeway” or “710 Tunnel” without affixing the adjective “controversial” to the project. Hearing so many comments of opposition and receiving so many letters against completion of the 710 Freeway in the EIR Scoping process, Caltrans

and the MTA might be led to believe that this is an unpopular project with the citizens and the voters.

Thus, part of the official record should reflect the fact that there is no city and no political district where the majority of voters or citizens oppose completion of the 710 Freeway. None. Not one. Including the cities of South Pasadena and La Cañada which show a statistical tie.

- 61 cities and political districts have been polled on the 710 Freeway
- The is no city or political district in which voters are opposed to the 710
- In the cities of South Pasadena and La Cañada voters are evenly split
- In all other cities and districts support ranges
    - From a low of 1.6 to 1 (Pasadena Council District 6)
    - To a high of 8.2 to 1 (Pasadena Council District 3)
- All other polled cities or districts are greater than 2 to 1 in support
- Pasadena voters favor 710 completion by a margin of 3.3 to one.
- El Sereno voters favor 710 completion by a margin of 2.1 to one.
- Alhambra voters favor completion by a margin of 7.4 to one.
- City of Los Angeles voters favor completion by a 5.6 to one margin
- Citizens in the 31-city San Gabriel Valley favor completion by 5.7 to one.

(Continued)

Cities and Districts polled	
City of Alhambra	State Assembly District 43
City of Glendale	State Assembly District 44
City of La Cañada Flintridge	State Assembly District 45
City of Los Angeles	State Assembly District 46
City of South Pasadena	State Assembly District 49
San Gabriel Valley – 31 cities	State Senate District 21
City of Los Angeles Council District 14	State Senate District 22
City of Los Angeles El Sereno District	State Senate District 24
City of Pasadena	U.S. Congressional District 27
City of Pasadena District 1	U.S. Congressional District 26
City of Pasadena District 2	U.S. Congressional District 27
City of Pasadena District 3	U.S. Congressional District 28
City of Pasadena District 4	U.S. Congressional District 29
City of Pasadena District 5	U.S. Congressional District 30
City of Pasadena District 6	U.S. Congressional District 34
City of Pasadena District 7	

is not a government by squeaky wheel, but government by the people. The people's will is mented in dozens of public polls. The people's will is to complete the 710 Freeway.

erely,

3. Read, Chair

chments: Details of public polls

Summaries of public polls regarding support of opposition to completing the 710 Freeway

	Alhambra	El Sereno	Glendale	La Cañada	Los Angeles	Pasadena	S Gabriel Valley	South Pasadena	S
Population	85,804	47,291	200,000	20,318	3.7 million	133,936	1.9 million	24,292	2
Poll Date	Sept,1999	Nov, 2000	May, 2009	May, 2004	May, 2004	Mar, 2000	July, 2000	Mar, 1998	A
Pollster	Guerra & Assoc./Godbe Research and Analysis	Guerra & Assoc./Godbe Research and Analysis	Godbe Research and Analysis	Godbe Research and Analysis	Godbe Research and Analysis	Godbe Research and Analysis	The Rose Institute	Godbe Research and Analysis	G R A
Question	"Do you support or oppose completing the 710 Freeway to the 210 Freeway?"	"First, do you support or oppose completing the 710 Freeway?"	"Do you support or oppose completion of the 710 Freeway?"	"Do you support or oppose the completion of the 710 Freeway Project?"	"The 710 Gap Closure Project would complete the last 4 ½ of the 710 Fwy in the corridor that runs thru El Sereno and So. Pas. into the City of Pasadena. Do you support or oppose the completion of the 710 Fwy?"	"First, do you support or oppose completing the 710 Freeway, also known as the Long Beach Freeway?"	"Do you support completion of the 710 Freeway?"	"In order to connect 2 sections of the 710 Fwy. between the 10 and 210 Fwys, shall a new 6-mi. section of the 710 Fwy. be built through the center of South Pasadena?"	" t f c v r c a p c t 1 u S P c 7 P
For 710	**81%**	**60%**	**51%**	**41%**	**45%**	**59%**	**63%**	**17%**	**4**
Definitely yes	Definitely support 71%	Definitely support 45%	Strongly support 29%	Strongly yes 28%	Strongly yes 26%	Definitely support 51%	Yes,strongly 29%	Definitely yes 12%	S s 1
Probably yes	Probably support 10%	Probably support 15%	Somewhat Support 22%	Somewhat yes 13%	Somewhat yes 19%	Probably support 8%	Yes 34%	Probably yes 5%	S s 2

Against 710	**11%**	**28%**	**21%**	**42%**	**8%**	**18%**	**11%**	**80%**	**4**
Probably no	Probably oppose 3%	Probably oppose 6%	Somewhat oppose 7%	Somewhat no **9%**	Somewhat no **3%**	Probably oppose 3%	No 7%	Probably no 7%	S o 9
Definitely no	Definitely oppose 8%	Definitely oppose 22%	Strongly oppose 14%	Strongly no **33%**	Strongly no **5%**	Definitely oppose 15%	No strongly 4%	Definitely no 73%	S o 3
Ratio Yes/no	YES 7.4:1	YES 2.1:1	YES 2.4:1	EVEN	YES 5.6:1	YES 3.3:1	YES 5.7:1	NO 4.7:1	E
Undecided; don't know; etc	8%	13%	28%	17%	46%	24%	26%	4%	1

710 Freeway Coalition
100 E. Corson St., Suite 200, Pasadena, CA 91103
(626) 578-0705 • FAX (626) 578-0706

710 Freeway Coalition

100 E. Corson St., Suite 200, Pasadena, CA 91103
(626) 578-0705 • FAX (626) 578-0706

Poll Results – April 2004

Question: The 710 Gap Closure Project would complete the last four and a half miles of the 710 Freeway in the corridor that runs through El Sereno and South Pasadena into the City of Pasadena. Do you support or oppose the completion of the 710 Freeway?

Poll conducted by Godbe Research & Analysis
3,531 voters surveyed. Margin of error = less than 5%

	Ratio of Support to Oppose %	Combined Support %	Combined Oppose %	Strongly Support %	Somewhat Support %	Somewhat Oppose %	Strongly Oppose %	Don't Know %
City of Los Angeles	5.25 to 1	45.7	8.7	26.3	19.4	3.3	5.4	45.5
L.A. City Council Dist 14 Antonio Villaraigosa	2.29 to 1	54.4	23.8	36.1	18.3	7.5	16.3	21.9
Congress District 29 Adam Schiff	2.30 to 1	51.3	22.3	34.2	17.1	5.8	16.5	26.4
Congress District 34 Lucille Roybal-Allard	5.44 to 1	58.8	10.8	35.0	23.8	4.5	6.3	30.4
State Senate District 21 Jack Scott	2.88 to 1	48.3	16.8	29.9	18.4	4.7	12.1	35.0
State Senate District 22 Gilbert Cedillo	2.97 to 1	52.5	17.7	32.4	20.1	4.9	12.8	29.8
State Senate District 24 Gloria Romero	4.47 to 1	55.9	12.5	37.5	18.4	5.2	7.3	31.7
Assembly District 43 Dario Frommer	3.25 to 1	41.8	12.8	21.5	20.1	4.1	8.7	45.6
Assembly District 44 Carol Liu	1.99 to 1	54.2	27.2	37.6	16.6	7.1	20.1	18.7
Assembly District 45 Jackie Goldberg	2.72 to 1	45.7	16.8	28.0	17.7	4.8	12.0	37.6
Assembly District 46 Fabian Nuñez	6.98 to 1	58.6	8.4	33.2	25.4	2.7	5.7	32.9
Assembly District 49 Judy Chu	3.21 to 1	57.8	18.0	39.0	18.8	7.2	10.8	24.3
City of La Cañada Flintridge	.97 to 1	40.6	42.0	27.6	13.0	8.6	33.4	17.4

Thu 4/14/2011 8:54 PM
In a recent study done by USC and one of the largest and longest study of its kind USC researchers concluded that children living near busy highways have significant impairments in the development of their lungs that can lead to respiratory problems for the rest of their lives.
This is a pretty significant finding, considering that any proposed freeway project being proposed in El Sereno would have a devastating effect on all surrounding Communities.

I live in the El Sereno neighborhood that will be directly impacted by the 710 Tunnel/Fwy project. My neighbors and I are gravely concerned about the increased pollution that will result from the 710 Freeway Project. More than 100 major studies have been published over the last decade documenting the direct relationship between freeway pollution and health. The proposed 710 tunnel project will concentrate pollution, and noise at various ventilation areas. Freeway pollution and noise increase the risk of developing asthma, cancer, hearing loss, and stress-related diseases. Freeways divide communities and cause pollution. They are a major environmental and health hazard, as recently confirmed by USC studies. Putting the tunnel underground will not make that fact go away. The pollution will still exist but in a more concentrated manner. Currently there is no technology that can eliminate the pollution to levels that are not harmful to humans. No one has offered any evidence to challenge that fact.
This project poses too many unanswered questions and does not adequately address pollution, technology, earthquake faults, political contributions/donations and other issues that demand serious answers and research by outside entities not tied to this project.

Fifty years ago, we were ignorant about the dangers of freeways. Today, these problems are well documented. Fifty years is enough. There is a need for more stringent regulation of the development of freeways, and of land around freeways.

All parties should consider the following:

* Disclosure of all political contributions from any source for all politicians involved in the 710 freeway or Politicians serving in areas affected by the 710 Freeway .

* Elimination of all 710 tunnel/freeway and related projects in the 710 connector route.

* Use one of the other alternative routes. The El Sereno route is impacted by earthquake faults.

*Consider other alternative modes such as rail, buses, more ports .

* Monetary reparations to all people living next to freeways.

* No more new housing built next to freeways.

* Relocate schools and homes built next to freeways.

* No Valley Connector Road or Low Mode Alternative in El Sereno that will increase traffic in El Sereno

* Build a 6 block wide park on each side along the route of the Freeway if the 710 Freeway connection is built. (No homes for 6-7 blocks on each side of the 710 Tunnel Freeway route from Valley Blvd. To Pasadena.

* Mandatory air quality testing for businesses, homes next to freeways, with data available to the public, on the internat, with no fees.

* Reform freeway funding to encourage safety, health, and ecological protection.

* Health Insurance fund set up for living near the 710 Fwy and impacted by the 710 Fwy.

There is a need to be more sensitive to the danger of freeways, and that people who have suffered from freeways be compensated for their suffering.

Sincerely,
Lily Ibanez

From: Delaine Shane [mailto:dshane1@earthlink.net]
Sent: Thursday, April 14, 2011 10:20 PM
To: SR710Conversations
Subject: Comment Letter on Caltrans' Proposed State Route 710 North Gap Closure Notice of Preparation/Notice of IntentDear Mr. Ronald Kosinski:

Please accept this e-mail message with the pdf attachment as my comments on your agency's NOP for the subject project. If for some reason you can not read the pdf attachment, please let me know and I will resend. I have also transmitted the original to your attention by regular mail.

Thank you for your consideration.

Sincerely,

Mrs. Delaine W. Shane

April 13, 2011

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

File: 07-LA-710
PM 26.7/32.1
EA/Project ID:
187900/0700000191
710 Gap Closure

Subject: Notice of Preparation (NOP)/Notice of Intent (NOI) for a Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the 710 Gap Closure (State Clearinghouse No. 1982092310)

Dear Mr. Kosinski:

The information contained in this letter is provided for your agency's use. My comments are based on the narratives of the NOP/NOI indicating Caltrans' intent to prepare a Draft EIR/EIS for the State Route 710 Gap Closure Project ("Project"), as well as on the noticing effort for public scoping meetings. These comments are in sync with the requirements of the California Environmental Quality Act (CEQA), the State CEQA Guidelines, the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ)'s NEPA Regulations, to name just a few of the many federal, state, and local environmental regulations and laws that the Project may potentially trigger.

There are several substantive inadequacies and procedural errors in the NOP/NOI that merit the consideration of Caltrans in revising and re-circulating the NOP/NOI. Other issues are raised as well in this letter that can or will influence the preparation and processing of the Draft EIR/EIS.

1. **No specific details in the NOP/NOI on the proposed Project/proposed Action.**
    a. Without specificity in the NOP/NOI, the narrative reads more as a feasibility study rather than a well defined construction activity. Five possible route alignments are alluded to, but none are specifically identified either in the text or in the attached figure included with the NOP. A wide study area in the San Gabriel Valley is shown in the NOP, but not the specific construction impact zones within it. An NOP/NOI is not the vehicle to develop a project description, but rather to seek out from others what their environmental concerns are with the project as proposed. If Caltrans is still defining its Project, time would be better spent to develop a feasibility study first prior to going through the expensive and time consuming CEQA/NEPA process at this stage.
    b. The NOP/NOI indicates that several general possibilities exist in closing the 710 gap with the following (but not limited to): "...surface and subsurface highway/freeway construction, heavy rail and bus/light rail systems, local street upgrades, traffic management systems and a no build alternative." With no specificity, agencies and public alike have no idea what is the true nature of the Project. Section 15082 of the State CEQA Guidelines and 40 Code of Federal Regulations (CFR) 1508.22 clearly spell out the contents of a NOP and NOI, respectively. Caltrans' version does not adequately comply with these CEQA/NEPA requirements.

2. **The lack of specificity diminishes the role and responsibility of each commenting responsible, trustee and federal public agencies.**
    a. Without a well written NOP/NOI, affected agencies are unable to fulfill their roles and responsibilities for written comments to the lead agency (i.e., Caltrans). Section 15082(a)(1) of the State CEQA Guidelines state: "The notice of preparation shall provide the responsible and trustee agencies and the Office of Planning and Research with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response." Section 15082(b)(1) of the State CEQA Guidelines further state: "...each responsible and trustee agency ... shall provide the lead agency with specific detail about the scope and content of the environmental information related to the responsible or trustee agency's area of statutory responsibility that must be included in the draft EIR." How can these agencies write anything meaningful when the NOP/NOI is so ambiguous?
    b. The State CEQA Guidelines also mandate in Section 15082(b)(3): "A generalized list of concerns [by the responsible or trustee agency] not related to the specific project shall not meet the requirements of this section for a response [to the lead agency]." If the agencies don't know the specifics of the Project, and a generalized list is not sufficient, then how can they meet their statutory requirements under CEQA or NEPA?
    c. Public agencies are now under dire budget constraints and understaffed. It is not appropriate to send out a vague NOP/NOI that requires these agencies and the public to take the time and research effort to figure out whether or not they should comment. CEQA specifically states that: "Documents prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decision makers and to the public." [Public Resources Code, Section 21003(b)]

3. **The approach to advertising the public scoping meetings was confusing.**
    a. The transmittal letter and the NOP from Caltrans (dated February 28, 2011) to Responsible, Trustee and Federal Agencies indicated six public scoping meetings. The NOI posted by the Federal Highway Administration in the Federal Register (March 9, 2011) indicated these six public scoping meetings plus an online virtual scoping meeting to be held on March 21st and to be on demand through April 14th. Why was the virtual scoping meeting left out of the February 28th letter to the responsible, trustee and federal agencies for the NOP process?
    b. On March 9, 2011, Caltrans published a legal notice on the public scoping meetings on page 7 in the *South Pasadena Review*. Here, only three meetings were noted, in El Sereno, Pasadena, and the online virtual meeting. Yet, there was no mention of the South Pasadena scoping meeting.
    c. In the same new local newspaper, on page 2, a large advertisement states: "SR-710 Conversations" "You are invited to a series of Metro community meetings." "Series 3: Scoping – Going on the Record." The purpose of a public scoping meeting is fairly well defined both under CEQA and NEPA, yet this ad seems to focus on "a community meeting", which does not necessarily suggest or merit the kind of participation the working public may attend were it to be a true CEQA or NEPA public scoping meeting.

4. **The NOP did not contain an e-mail address for affected public agencies or the public to submit comments.**
    a. Due to recent changes in the statute, e-mail messages can be sent to the lead agency for commenting during the EIR process. The NOP does not state that such venue is available. According to PRC Section 21091(d)(3)(A): "With respect to consideration of comments received on a draft environmental impact report, proposed negative declaration, proposed mitigated negative declaration, or notice received pursuant to Section 21080.4 [this section is in reference to a Notice of Preparation], the lead agency shall accept comments via e-mail and shall treat comments as equivalent to written comments."
    b. Many public agencies, along with the public, today use e-mail messages as their primary mode of written communication. Referring back to the *South Pasadena Review* ad on page 2 of the March 9th edition, the SR-710 Conversations noted three social media addresses:
        i. Email: sr710conversations@metro.net
        ii. Facebook: facebook.com/sr710conversations
        iii. Twitter: twitter.com/sr710convos

        On page 7 in the Legal section, Caltrans advertised the website: www.metro.net/sr710conversations.

        So, are these four social media networking addresses all valid to provide comments on the NOP? And if so, why were they not mentioned in the NOP to affected public agencies and in the NOI as published in the Federal Register?

5. **The role of the Federal Highway Administration (FHWA) for this proposed Action is not spelled out in the NOI.**
    a. The NEPA Pilot Program MOU allows Caltrans to assume the role and responsibilities of FHWA under NEPA and various other federal requirements. However, caveats exist. MOU Section 3.2.3 indicates: "The USDOT Secretary's responsibilities for government-to-government consultation with Indian tribes as defined in 36 CFR 800.16(m) may not be assumed by Caltrans under this MOU." Section 3.2.4 further states "...conformity determination required under Section 176 of the Clean Air Act..." must also not be assumed by Caltrans. Section 3.4 of the MOU sets out other limitations as well. With these caveats in mind, who in FHWA will be responsible for those duties that Caltrans cannot legally assume while the CEQA/NEPA process is ongoing? Is it Shawn E. Oliver, who signed off on the Federal Register notice for the NOI? Yet that notice reads that "Comments or questions concerning this proposed action and the EIS should be directed to Caltrans at the address provided above." This question is relevant as the NEPA Pilot Program is scheduled to end in August 2012. If Congress does not extend the sunset date, the NEPA process might revert back to FHWA, as the MOU would not be valid. On the other hand, if Congress does extend the pilot program, then how does Caltrans propose to fund this Project? Its financial viability is a requirement of the NEPA Pilot Program MOU and economics is a consideration under NEPA. [40 CFR 1508.8]

6. **The NOP is too vague on probable environmental impacts.**
    a. It is true that there is no CEQA requirement to include the Initial Study and Environmental Checklist (IS) with the NOP. However, in not including the IS with the NOP, that means that all environmental categories mandated by CEQA and NEPA must be included in the Draft EIR/EIS. Various entities, including business owners and residents, at this time may not be fully aware of all the environmental parameters that need to be discussed and would not necessarily have thought to bring them up in a letter or scoping meeting, such as aesthetics, energy conservation, mineral resources.
    b. Because the public and public agencies do not know the specifics of the Project, it is impossible to provide justifiable concerns in specific environmental categories as this time.
    c. One purpose of the NOP is to help limit the size of the EIR by indicating which environmental categories are either not relevant or will have no significant impact to the environment with the construction and operation of the Project. By not including the IS, all areas of environmental issues (even if they are not significant), must be presented in the Draft EIR/EIS. Since Caltrans will be complying with both CEQA and NEPA requirements, this decision has guaranteed that the environmental documents coupled with the technical appendices will be in the thousands of pages. This goes against the spirit and goals of both environmental laws. That is why I am recommending that Caltrans revise and re-circulate the NOP to include the Project's description, include the IS with the NOP and identify the probable environmental impacts to be discussed in the Draft EIR/EIS, and whittle down the analyses to what will be the potential significant impacts of the Project.

7. **Various environmental impacts to be considered in the Draft EIR/EIS.**
    a. Under CEQA requirements, Caltrans will need to consider a variety of environmental impacts depending on the nature of the Project. Tunneling, constructing surface routes, modifying existing transit lines, and implementing other transportation system measures do not necessarily cause the same types of environmental impacts, either in magnitude or frequency. I counted ten environmental categories the NOP mentions (some of the categories are actually part of the same overall category, such as "vehicle traffic patterns" and "parking" would fall into the overall category of Transportation/ Traffic). For the record, though, here are the environmental categories that Caltrans will need to evaluate with project implementation in the Draft EIR/EIS:
        i. Aesthetics, Agriculture & Forestry Resources, Air Quality, Biological Resources, Cultural Resources (Archaeology, Historical Resources, Paleontology), Energy Conservation (see Appendix F of the State CEQA Guidelines) Geology/Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/ Housing, Public Services, Recreation, Transportation/Traffic, and Utilities/ Service Systems.
    b. Under NEPA requirements, Caltrans will have to evaluate the categories above and additionally with the following federal environmental categories:
        i. Economic and Social Conditions, Environmental Sustainability (refer to the CEQ NEPA Regulations), Environmental Justice, and Indian Trust Assets.

ii. Although not a NEPA requirement, I respectfully request that a cost-benefit analysis for the proposed Action be prepared as part of the Draft EIR/EIS. [40 CFR 1502.23]

8. **The NOP anticipates that there will be several environmental/regulatory permits required that would imply that a surface level approach to the Project will be the most likely outcome, thereby showing a bias.**
   a. The permits cited in the NOP (e.g., Section 401 and 404 of the Federal Clean Water Act) are typical for getting clearances for crossing, filling, or impacting streams, washes, and rivers. Encroachment permits are typically for access to public streets and public rights-of-way. What types of permits would be required for tunneling?
   b. If a biological opinion is required, will Caltrans apply for a Section 7 Consultation or Section 10(a) Permit under the Federal Endangered Species Act? If a Section 10(a) Permit is sought, then what areas/properties will Caltrans rely on as habitat conservation planning reserves?

9. **Alternatives are too vague in the NOP/NOI and emphasize new construction or major expansion of existing transit systems.**
   a. There is no mention of non-building, alternative and sustainable public transportation measures, such as telecommuting and vanpools relying on alternative fuels. According to the 40 CFR 1502.14(c): "In this section agencies shall: ...Include reasonable alternatives not within the jurisdiction of the lead agency." Such measures deserve a thorough analysis as a feasible alternative in the Draft EIR/EIS.
   b. The city of South Pasadena's Multi-Mode Low Build Alternative should be analyzed as a feasible alternative in the Draft EIR/EIS.

10. **Other Issues For the Draft EIR/EIS.**
   a. From a legislative standpoint and approvals by responsible agencies, Caltrans should acknowledge Assembly Bill 353 (Cedillo) in the Draft EIR/EIS. Should this bill be passed in this legislative year, then Caltrans will have to enter into agreement(s) with the city of South Pasadena and other cities prior to constructing a freeway "extension" or "gap closure" through their jurisdictions. This bill would repeal Section 100.4 of the Streets and Highway Code.
   b. Establishing the proper baseline for the environmental setting is critical. Caltrans will need to carefully consider a baseline predicated on future, post-approval conditions for its analysis of the Project's environmental impacts. [Refer to Sunnyvale West Neighborhood Assn. v. City of Sunnyvale City Council, No. H035135 (6th Dist., December 16, 2010)]. In essence, please be very specific as to what assumptions Caltrans' plans to use when establishing baseline conditions in which to analyze impacts. The wrong baseline can deeply skew the analyses of impacts one way or another.

Thank you for the opportunity to comment on the NOP/NOI. I would appreciate receiving your environmental documentation for the Project as you make it available to the public, including the technical appendices.

Sincerely,

Delaine W. Shane

Mrs. Delaine W. Shane
402 El Centro Street, Unit #12
South Pasadena, CA 91030

cc: South Pasadena City Council
La Canada Flintridge City Council
Antonio Rossman
Dr. James Sherman
The 710 Freeway Fighters
Sierra Club

From: Nabil Sejaan [mailto:nabilsejaan@hotmail.com]
Sent: Thursday, April 14, 2011 4:38 PM
To: SR710Conversations
Subject: 710 Gap Closure project Scoping

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S. Main Street, MS16A
Los Angeles, California 90012

Thank you for the opportunity to comment on scope of the Environmental Impact Report for the 710 Gap Closure project.
In order to not be repetative, I would like to express my full support of the Scoping letter dated April 9, 2011 sent by Stephanie Johnson, Los Robles Avenue, San Marino, CA 91108. Please address the issues in your EIR / EIS and mitigate the negative impact on los robles.

Sincerely.
Nabil Sejaan
los robles
San Marino 91108
626 441 8511

From: Tom Williams [mailto:ctwiliams@yahoo.com]
Sent: Thursday, April 14, 2011 4:37 PM
To: ron_kosinski@dot.ca.gov
Cc: SR710Conversations; cynthia.ruiz@lacity.org
Subject: Re: Comments for SR-710 Scoping Report, Second and final batch
This batch completes comments from Dr. Williams.

--- On **Thu, 4/14/11, Tom Williams <*ctwiliams@yahoo.com*>** wrote:

From: Tom Williams <ctwiliams@yahoo.com>
Subject: Comments for SR-710 Scoping Report
To: ron_kosinski@dot.ca.gov
Date: Thursday, April 14, 2011, 1:36 PM

Attached are the first batch of comments for the NOP/NOI Scoping for SR-710 North Extension/Gap Closure. At least one more to be transmitted before 5pm

Dr. Clyde T. Williams
4117 Barrett Road
Los Angeles, CA 90032-1712
323-528-9682 323-528-9682
ctwiliams@yahoo.com **6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS**
RE: Bus Rapid Transit Alternatives/Multi-Occupancy Only Alternative

The Scoping Report Alternatives Analyses, and EIR/EIS must include Bus Rapid Transit (BRT) systems for both N-S and E-W corridors.

In all above surface and elevated road alternatives, add a second alternative for the initial road alternative with a dedicated "Bus Rapid Transit" facility, and the BRTan additional alternative set for the following E-W corridors:

Marengo-City Terrace-Garvey
Main-Valley
Mission Road-Huntington Drive
Broadway-Figueroa-Monterey Road
Spring-San Fernando Road-Eagle Rock-Colorado

The BRT facility must include:

Upgrade curb lane – smooth surface, adjusted lane and curb curvature, driveway controls, overhead clearances for trees, wires, and signage
Signal Synchronization and Transit Signal Over-Rides
Out-of-Lane Stops and Stations
Integrated Multi-Road Transit Stations
Integrated Park-N-Ride Transit Stations

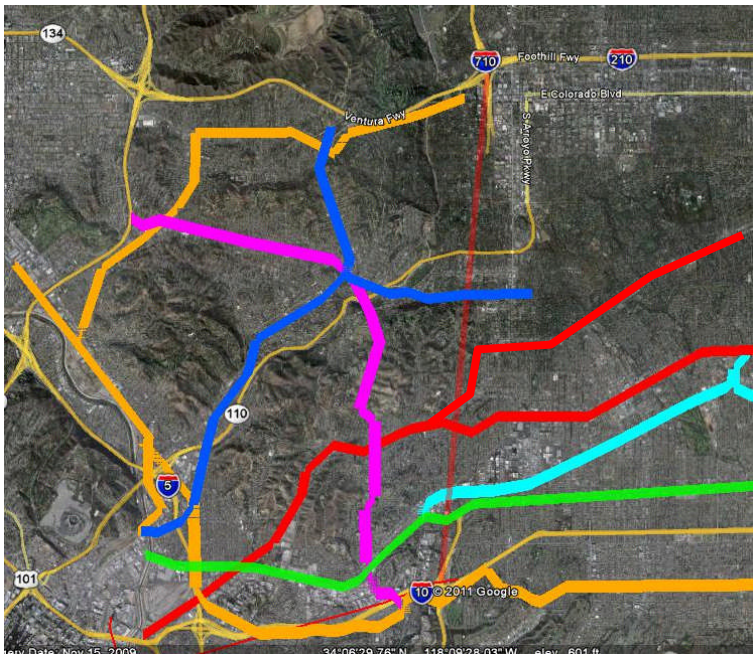
As a separate road alternative or as enlargement part of any MultiMode Alternative, add an alternative including fully dedicated bus-lane/BRT Corridor facilities along:

San Fernando Road-Eagle Rock Blvd.-Colorado as two-way SW-NE facility
Fremmont/Palm-Marengo as one-way couplets N/S facility

Garfield/Atlantic as one-way couplets N/S facility
Rosemead as two-way N/S facility
Valley – Main/Mission to Peck Road
Mission-Huntington Drive – Chavez to BuenaVista/Duarte

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Multimode Alternatives (including Transportation System Management)

The Scoping Report Alternatives Analyses, and EIR/EIS must include the following Multi-Mode systems for the illustrate ten-plus E-W and N-S corridors, see figure below



The Scoping Report, Alternatives Analyses, and EIR/EIS must include and develop a multimode approach consistent with those of MoveLA/FAST/Rand, South Pasadena, and others which usually involve several basic elements

Get Goods and Passengers on Rail
Get goods off the roads
Get passengers in multi-passenger road vehicles
Make streets, roads, freeway operate smarter – higher consistent flows
Increased passenger miles with fewer vehicles
Reduced peak-hour speeds but increased vehicle/hour and average daily trips
Price route and destination and origin parking to reflect true costs to the Public
Price fuel to reflect true environmental and infrastructure costs and impacts

MTA/CTs must include review of and assessment of application to LACounty in European urban plans to remove most light duty gas/diesel fueled individual-passenger vehicles from cities by 2035 and all individual-passenger vehicle by 2050.

The Scoping Report Alternatives Analyses, and EIR/EIS must include Important Components as well as

many others:

Freight *"Zero Port Road Freight 2035"*

Gaps – BNSF/UPRR>LOSSAN > High Desert Corridor and SanLuisObispo

Passengers

Rail Transit Systems

NE-RedLine Extension through Glendale

GoldLine West Extension-Glendale/Burbank/N.Hollywood

GoldLine East Grid – Whittier/Azusa N-S CrossLink

Road Transit Systems

Make Streets Work Better

Road Efficiencies

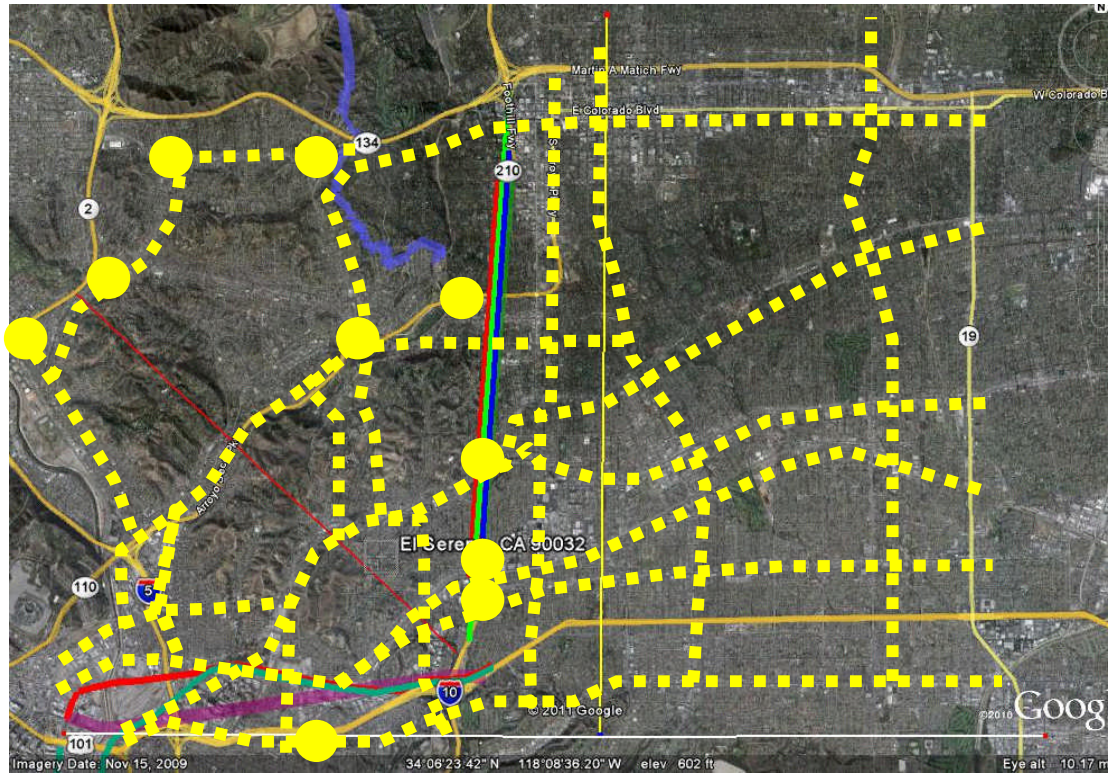
Demand Management

Parking Management

Free 1-3 hr retail parking

$25/car space-day – W of I-5, N of Slauson, E of Vermont, S of Los Feliz

Park-N-Ride – Parking Zone Perimeter of LA City as shown as example below:



Congestion Pricing for access to areas west of Par-N-Ride facilities

Similar to District Pricing (London, Singapore, HongKong, Dubai, etc.)

State/Local Registration – Full Cost Recovery for all vehicles in Study Area

LA County Fuel Taxes for a minimum of $5/gal – Gas and Diesel

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS

RE: Funding Alternatives

As the CTs presentations of needs and purposes included references to financial and funding alternatives, including Public Private Partnerships, the Scoping Report, Alternative Analyses, and EIR/EIS must include all relevant financial and funding systems for any alternative with:

Costs – Total Costs

Estimated capital costs or values of more than $1 billion (50% >Measure R funds)
Estimated funding costs (interest, fees, etc.) by sources (e.g., private, federal, state, etc.)
Estimated management and design (CTs, MTA, and cities)
Estimated commissioning and startup
Estimated annual and life-of-project costs

Revenues – Total Revenues

Measure R Only
Measure R + Tolls
Measure R + Beneficiary Commuter Districts + Tolls
Measure R + Beneficiary Commuter Districts + Containers/Ports Tonnage/Logistics + Tolls
Federal, State, Regional, and County grants and assistance
Other contributions

Financial Management

Federal, State, and CTs District
Regional-SCAG, County-MTA, and Cities
Special Assessment Districts
Project – Tolls, etc.

The Scoping Report, Alternative Analyses, and EIR/EIS must include various alternative contracting methods including:

Design/Build
Design/Build/Operate
Design/Finance/Build/Operate
Design/Finance/Build/Operate/Maintain
Design/Finance/Build/Operate/Maintain in Public Private Partnerships
Build/Operate/Transfer (BOT; Public provides only lands and some administrative activities)
Build/Own/Operate (BOO)

The Scoping Report, Alternative Analyses, and EIR/EIS must reflect and include considerations and LAO's concerns for Public-Private Partnerships as expressed in April 2011 by the State Legislative Analyst Office (http://www.lao.ca.gov/analysis/2010/transportation/trans_anl10.pdf) which can be summarized as follows:

Unidentified portion of the costs and allocations to Federal, State, regional, County, Cities, and any special assessment districts
State pays for operations and maintenance of transportation facilities from local funds
Project Costs not eligible for federal funding.
CTs not able to explain how it plans to spend funds requested
Legislature should not make such a large commitment of funds.
Unclear how P3 procurement would achieve certain cost savings
Assumed saving the state money over the life of the project.
Set-asides of a sizeable amount of the state's transportation funds to pay for P3 projects.
Reduced amounts of funding available for rest of state's highway maintenance/repairs

Budget Requests as a Blank Check - OPEN-ENDED authority to augment appropriation.
spend an unlimited amount of future federal funds
would be authorized INDEFINITELY

The Scoping Report, Alternative Analyses, and EIR/EIS must include:
Clear explanation how funds requested would be used, such as a list of activities
CTs plans to fund
Associated dollar amounts requested for these purposes
Identification of criteria/methodologies analyzing financial benefits from funding
use of payments would allow a project to be completed at a lower cost, or
significantly sooner project completion and operation than otherwise be the case.
Explanation of impact by prioritizing maintenance of privately managed transportation facilities on governments' ability to fund operations, maintenance, and repair of the rest of the highway system operated in/by LA County
Identification of governmental/public costs paid under P3 agreements directly or indirectly
Identification of O&M costs for transportation facilities (not eligible for federal funds)
Full independently verified and audited explanation as to how CTs plans to spend the majority of the funds requested
Support of assumed saving the state money over the life of the project
Impacts of reduced funds available for other highway maintenance and repair needs

The Scoping Report, Alternative Analyses, and EIR/EIS must include:
Workable Foundation agreements - given restrictions/requirements of funding sources
Financial plans on how funds requested would be used, such as a list of activities
Capital, Financials, Operations, and Maintenance
CTs plans to fund and associated dollar amounts requested for these purposes
Guarantee Maxima caps for all activities over $100M
Identifies quantitative assumptions, criteria, and methodologies used to establish state benefits from funding agreements.
Comparisons of Current Practices to demonstrate-
use of payments allow projects to be completed at a lower cost,
use of payments allow projects to be completed significantly sooner
Explanation of impacts of prioritizing maintenance of privately managed transportation facilities on the state's ability to fund maintenance and repair of the rest of the highway system operated by the state.

The Scoping Report, Alternative Analyses, and EIR/EIS must include comparisons of the financial aspects of each Alternative including costs assignments, revenue sources and their capabilities, indebtness costs, and potential for surplus revenue generation. Because of the unlimited range of all possible alternatives, the Scoping Report, Alternative Analyses, and EIR/EIS must include the widest possible ranges of financial resources, impacts, and mitigations.

The Scoping Report, Alternative Analyses, and EIR/EIS must include clarifications of the financial aspects of all CTs and MTA lands, their uses, and revenue/costs generation and their impacts on communities, municipal and County property taxes and other related indirect financial impacts and perhaps benefits.

The Scoping Report, Alternative Analyses, and EIR/EIS must include comparisons regarding the benefits derived from such large public expenditure through the support of local small-medium businesses and contractors and of construction trade employment. Alternative Analyses must include and compare Alternatives for:

Estimated direct support of local/LA County small to medium contractors

Estimated support of State medium to large contractors

Estimated support of international large contractors (generally under a State Contractor)

Estimated Non-California and International Contractors' shares of Contracts

Estimated shares of Contract values for heavy and specialized equipment and for materials vs labor components

Estimates must be appropriate to the stage of Alternative developments and may require engineering judgments and approximation based on recent – 2010-11 bidded contracts in the US and they should be applied in a conservative manner, no low-balling.

The Scoping Report, Alternative Analyses, and EIR/EIS must include comparisons regarding the use of existing contract administrative and inspection capabilities in cities and councils of governments rather than using CTs, MTA, or specialized consultants staffs.

6. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS

RE: Screening of Alternatives

The Scoping Report, Alternatives Analyses, and EIR/EIS must include quantitative criteria for assessing and comparing Alternatives during the Alternative Analyses and before commencing preparation of the EIR/EIS. MTA/CTs must also provide full transparent and accessible participation by the Public as the Public has not had actual Project context during the Scoping in order to recommend alternatives and mitigation and to present and evaluate significant impacts for the "Project" within a 100sq mi Study Area. Therefore the adequacy and completeness of the Scoping process is not fulfilled and appropriate for a multi-billion dollars project.

The Alternatives Analyses and Screening must include:

Project Purposes	*Define transportation problems to be solved in quantitative terms*
	Do not identify solutions, provides numerical criteria for success
	Promotes consideration of multiple modes and alternatives
Project Needs	*Establishes documented and quantified evidence that problems exist*

Project Goals	*Define broad vision statements influencing project characteristics*
Project Objectives	*Define quantified and scheduled steps to achieve the goals*

All screening must be based on pre-analyses established quantified criteria and ranking categories and their consistent application across the quantified information for each Alternative. Resorting numerical data and ranks after the comparisons must not be done and would demonstrate clearly bias and non-objective/arbitrary screening and process leading to the inadequacy of the EIR/EIS.

7. SUBJECT: SR-710 NORTH EXTENSION / GAP CLOSURE COMMENTS
RE: Methods and Approaches

The Scoping Report, Alternatives Analyses, and EIR/EIS must include quantitative and numerical analyses based on monitoring and verified numerical computerized model results. Words such as "improve", "increase", "reduce", "diminish", "degrade", etc. must be supported by numerical values and quantification with supporting evidence; qualitative measures and descriptors must not be used or incorporated. Because of the use of computer models, all programs and input files must be made available preferably online or by CD/DVDs to the Public.

All computer models must be verifiable as to their organization, use of information, and calculations and must be audited/verified by a independent specialist in each field and computer sciences/programming.

From: Val Marquez [mailto:concerned_nbors@pacbell.net]
Sent: Thursday, April 14, 2011 7:35 PM
To: SR710Conversations
Subject: Re: 710 traffic mitigation alternatives for EIR

My Address: 3118 Lowell Ave, Los Angele CA 90032

CONCERNED NEIGHBORS OF EL SERENO

"Change does not roll in on the wheels of inevitability,
but comes through continuous struggle."
- Martin Luther King

From: SR710Conversations <SR710Conversations@metro.net>
To: Val Marquez <concerned_nbors@pacbell.net>
Sent: Thu, April 14, 2011 6:56:23 PM
Subject: RE: 710 traffic mitigation alternatives for EIR

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative

record, please write back and provide your physical address (along with your comment).

I do not see your physical address included in your submission below.

From: Val Marquez [mailto:concerned_nbors@pacbell.net]
Sent: Thursday, April 14, 2011 5:00 PM
To: SR710Conversations
Subject: Fw: 710 traffic mitigation alternatives for EIR

Please submit these comments and enter into the official EIR record.

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

Add two lanes to 710 entering the 10 freeway in each direction. Drivers missing the interchange have to exit Valley Blvd. adding to traffic bogs at Valley Blvd

Create a Hellman Ave. off ramp

Use of electric rail for freight movement from the ports
No build - end 710 at the I-10 Fwy and mitigate traffic on the I-10 Fwy West and East

Two right turn lanes going east on Valley Blvd and one single lane bridge overpass exiting the 710 west bound to Valley Blvd - This lane would be a continuous exit without stoplights that would merge with Valley Blvd - making it easier to get off the 710, relieving the corridor

VAL MARQUEZ
CONCERNED NEIGHBORS OF EL SERENO

From: Valentino, Danielle [mailto:ValentinoD@metro.net] **On Behalf Of** SR710Conversations
Sent: Thursday, April 14, 2011 6:53 PM
To: 'Val Marquez'; SR710Conversations; ron_kosinski@dot.ca.gov
Cc: ron_kosinski@dot.ca.gov
Subject: RE: 710 traffic environmental concerns and traffic mitigation alternatives for EIR

Thank you for your submission. Please note that your official scoping comment has been received and will be considered.

From: Val Marquez [mailto:val@valsdesignstudio.com]
Sent: Thursday, April 14, 2011 4:47 PM
To: SR710Conversations; ron_kosinski@dot.ca.gov
Cc: ron_kosinski@dot.ca.gov
Subject: 710 traffic environmental concerns and traffic mitigation alternatives for EIR

Please submit these comments and enter into the official EIR record.

Use of electric rail for freight movement from the ports

No build - end 710 at the I-10 Fwy and mitigate traffic on the I-10 Fwy West and East

Two right turn lanes going east on Valley Blvd and one single lane bridge overpass exiting the 710 west bound to Valley Blvd - This lane would be a continuous exit without stoplights that would merge with Valley Blvd - making it easier to get off the 710, relieving the corridor

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

Create a Hellman Ave. off ramp

Add two lanes to 710 entering the 10 freeway in each direction. Drivers missing the interchange have to exit Valley Blvd. adding to traffic bogs at Valley Blvd

Val Marquez
3118 lowell Ave
Los Angeles, CA 90032

From: Val Marquez [mailto:dominovm@pacbell.net]
Sent: Thursday, April 14, 2011 4:50 PM
To: SR710Conversations
Cc: ron_kosinski@dot.ca.gov
Subject: 710 traffic mitigation alternatives for EIR
Please submit these comments and enter into the official EIR record.

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

Add two lanes to 710 entering the 10 freeway in each direction. Drivers missing the interchange have to exit Valley Blvd. adding to traffic bogs at Valley Blvd

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Valentin Marquez
3118 lowell Ave
Los Angeles, CA 90032

From: PAMELA MARQUEZ [mailto:pamandval@yahoo.com]
Sent: Thursday, April 14, 2011 4:56 PM
To: SR710Conversations
Subject: 710 traffic mitigation alternatives for EIR
Please submit these comments and enter into the official EIR record.

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

Add two lanes to 710 entering the 10 freeway in each direction. Drivers missing the interchange have to exit Valley Blvd. adding to traffic bogs at Valley Blvd

Create a Hellman Ave. off ramp

Use of electric rail for freight movement from the ports

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Two right turn lanes going east on Valley Blvd and one single lane bridge overpass exiting the 710 west bound to Valley Blvd - This lane would be a continuous exit without stoplights that would merge with Valley Blvd - making it easier to get off the 710, relieving the corridor

PAMELA MARQUEZ
3118 LOWELL AVE
LOS ANGELES, CA 90032

From: Val Marquez [mailto:concerned_nbors@pacbell.net]
Sent: Thursday, April 14, 2011 4:59 PM
To: SR710Conversations
Subject: 710 traffic mitigation alternatives for EIR
Please submit these comments and enter into the official EIR record.

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

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Create a Hellman Ave. off ramp

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PAMELA MARQUEZ
CONCERNED NEIGHBORS OF EL SERENO

From: Val Marquez [mailto:concerned_nbors@pacbell.net]

Sent: Thursday, April 14, 2011 7:36 PM
To: SR710Conversations
Subject: Re: 710 traffic mitigation alternatives for EIR

3132 Lowell Ave, Los Angeles, CA 90032

CONCERNED NEIGHBORS OF EL SERENO

"Change does not roll in on the wheels of inevitability,
but comes through continuous struggle."
- Martin Luther King

From: SR710Conversations <SR710Conversations@metro.net>
To: Val Marquez <concerned_nbors@pacbell.net>
Sent: Thu, April 14, 2011 6:55:43 PM
Subject: RE: 710 traffic mitigation alternatives for EIR

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your physical address (along with your comment).

I do not see your physical address included in your submission below.

From: Val Marquez [mailto:concerned_nbors@pacbell.net]
Sent: Thursday, April 14, 2011 4:59 PM
To: SR710Conversations
Subject: 710 traffic mitigation alternatives for EIR

Please submit these comments and enter into the official EIR record.

Complete the 110 Pasadena Fwy to 210 Via tunnel at Arroyo Parkway

Add two lanes to 710 entering the 10 freeway in each direction. Drivers missing the interchange have to exit Valley Blvd. adding to traffic bogs at Valley Blvd

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PAMELA MARQUEZ

CONCERNED NEIGHBORS OF EL SERENO

From: Walker, Daniel [mailto:daniel.walker2@boeing.com]
Sent: Thursday, April 14, 2011 5:18 PM
To: SR710Conversations
Subject: 710 Freeway EIR Scoping comments

To: MTA and Caltrans;

Dear Ron Kosinski, Deputy District Director, Caltrans District 7;

We are strong supporters of closing the 710 freeway gap. Let's get started with the EIR so that the tunnel work can begin ASAP. Southern California has many significant existing transportation, environmental, and budget challenges. Completing the 710 freeway will help reduce transportation congestion, especially on other parallel freeways (10, 110, 605) and local roads in the 710 corridor. Closing the 710 gap should help reduce overall air pollution and provide numerous good local construction and engineering jobs. The voters have spoken and they included $780M funding for the 710 gap closure in passing Measure R by more than 2/3 majority.

Previous studies have concluded that an underground route from the terminus of the 710 freeway under South Pass to the 210 is indeed feasible. Numerous similar tunnels have been built successfully in many more challenging places around the world, and construction costs have come down in recent years. We would like to commend MTA and Caltrans for the extensive outreach effort over the last many months to inform the public about the 710 project and solicit feedback. Despite this unusual 710 PR and media attention, with a few exceptions, we have observed consistent widespread popular support for finishing this freeway. LA County has about 10 million people who need to get to their jobs, their schools, their families, and to other important destinations. Finishing the 710 freeway will help most of us get there a little faster, with minimal impact on the environment. However, taxpayers want this project to be built right, efficiently, and as soon as practical. The EIR should help us all learn the facts about how much improvement we should really see on our already very crowded existing freeways and roads. How much will this smoother traffic flow along 710, other freeways and roads improve air pollution? How much will tunnel construction cost? What are the environmental impacts and how can these impacts be mitigated or eliminated?

A direct tunnel from 710 stub to the 210 stub in Pasadena is probably the most feasible route for the 710 freeway gap closure. However, for NEPA/CEQA legal requirements, must Caltrans include an updated surface alternative (i.e. previously approved route which received Record of Decision in 1990s) for comparison with the tunnel option? The tunnel construction may cost somewhat more than a similar surface route but the tunnel would have much less impact on South Pasadena and El Sereno. Much of the construction cost difference should be made up when Caltrans sells the numerous properties which would not be needed for the 710 tunnel route. Hopefully, the EIR will provide positive suggestions and mitigation ideas which will improve the final tunnel project so that there is little or no significant impact on the neighborhoods above the tunnel or near the exits.

A variety of other transportation projects in Southern California have been suggested as potential alternatives to the 710 gap closure. For example, we support Gold Line Foothill extension in the San Gabriel Valley along the 210 corridor, ultimately to Ontario Airport. We also support various projects to

improve freight goods movement from the LA/LB ports throughout the region and beyond (i.e. ACE railroad grade separations in San Gabriel Valley area). There were also some interesting proposals to improve local streets (i.e. add turn lanes, widen roads), add bike routes / lanes, additional park and ride lots, improved sidewalks for pedestrians, etc. Some of these projects have on-going environmental reviews and some others deserve serious study separate from this 710 gap closure project. However, none of these other projects will improve regional transportation like the 710 tunnel would. We suggest that Caltrans / MTA quickly narrow scoping of reasonable alternatives and eliminate other (non-tunnel) alternatives based on clear objective criteria. For example, should not bother to study all 5 tunnel regions already studied for feasibility in 2009-10 (just focus on the most direct route instead).

We suggest that Caltrans / MTA to move forward ASAP with 710 freeway environmental review process. However, let's not study this tunnel to death. We have studied various options and tunnels for several decades while traffic has gotten worse.

What alternative(s) should MTA/Caltrans analyze in detailed environmental review?

1. full length tunnel (approximately 28000 ft long) - starting tunnel south of Valley Blvd.
2. "Meredian" surface alternative (ROD, approved route from early 90s) or other similar previously studied direct surface route (only study surface route if required by CEQA/NEPA)
4. intermediate tunnel entrance / exit for 110 freeway and/or Huntington Dr.? How much additional transportation benefit gained by 210 south link via tunnel directly to 110 south (and 110 north to 210 north)? Additional cost for intermediate portal vs. single direct tunnel just from 210 to 710 stub?
5. trucks vs. no trucks thru tunnel? (no trucks with hazardous materials are allowed in any tunnel, right?)
6. toll vs. no toll? Toll pricing? How long before tunnel construction cost fully paid for by users?
7. 710 tunnel HOV lanes vs. no HOV lanes?
8. 3 vs. 4 lanes each direction thru tunnel?
9. potential locations for potential ventilation shafts ? Any shafts really needed? Type of ventilation scrubbers available and costs? Reduction in escaped air pollution, particulates, compared to surface route if scrubbers used?
10. reasonable environmental mitigation - for example:
a. Would sound walls on 710/210 freeways near tunnel portals reduce noise levels significantly for freeway neighbors, despite some additional 710 flow?
b. Is noise cancelation technology feasible to significantly reduce noise from freeway cars/trucks for existing 710 freeway neighbors?
c. Would neighborhoods above the tunnel actually feel significant vibrations from tunnel construction or car traffic in tunnel?
d. Would any significant "settling" (i.e. movement) of surface ground above the tunnel be expected due to construction?
e. Would be the likely routes to/from the tunnel during construction for trucks, heavy equipment, dirt removal, etc.?
f. Would existing 710 / 210 freeways and on-ramps/off-ramps remain open during tunnel construction?
11. tunnel safety mitigations for accidents, fires, earthquakes, water run off, etc.?
12. potential private funding options to help pay for construction, maintenance, operation of electronic tolls, etc.

I suggest that Caltrans complete the EIR process as quickly and efficiently as possible. However, EIR should be 100% compatible with CEQA/NEPA rules and standards used for other similar recent projects. MTA / Caltrans study all feasible / reasonable alternatives and should consider all potentially significant environmental impacts, such as historic buildings, Indian burial grounds, global warming, etc.

We support 710 gap closure tunnel. Let's build it right. Let's build it ASAP.

thanks,

Daniel , Lucia, Ryan, and Amanda Walker
7416 West 82nd Street
Los Angeles, CA 90045

From: Valentino, Danielle [mailto:ValentinoD@metro.net] **On Behalf Of** SR710Conversations
Sent: Thursday, April 14, 2011 6:42 PM
To: 'Messner, Ernest L'; SR710Conversations
Cc: emessner@aol.com
Subject: RE: Comments on SR-710 Extension
Thank you for your submission. Please note that your official scoping comment has been received and will be considered.

From: Messner, Ernest L [mailto:ernest_l_messner@fanniemae.com]
Sent: Thursday, April 14, 2011 11:56 AM
To: SR710Conversations
Cc: emessner@aol.com
Subject: Comments on SR-710 Extension

Please place my comments in the record.

I am a resident of LaCanada Flintridge. I live at 4556 Vineta Ave approximately 150 North of the existing 210 Freeway.

Please include all Pasadena, LaCanada Flintridge and Montrose in your scoping area for environmental impacts.

Environmental impacts which I believe should be addressed are: increased noise on the 210 freeway, degradation of air quality, and containment of known particulates (primarily discharged by diesel truck engines) which are known carcinogens.

I do not believe a tunnel is a safe alternative due to its length and transport of flammable materials.

Alternatives to the SR-710 extension should include a multimodal transportation design to and from the Ports to include train transportation to primary distribution points in Central California, Nevada, and outside
the Los Angeles Metropolitan area. Public transit should be studied for an above ground fixed rail system connecting either in downtown Los Angeles or in one of the South Pasadena/Highland Park/or Pasadena Gold Line stations. I drive the 710 now, and aside from modest surface traffic during rush hours, there is no apparent need for a freeway to carry passenger vehicles. Surface street signals could by synchronized
and the transition road in Pasadena straightened - a modest expense.

Thank you for the opportunity to voice my comments.

Ernest L. Messner

From: Valentino, Danielle [mailto:ValentinoD@metro.net] **On Behalf Of** SR710Conversations
Sent: Thursday, April 14, 2011 6:46 PM
To: 'Janka, Bahman'; Ron.Kosinski@dot.ca.gov; SR710Conversations
Cc: Dock, Fred; Beck, Michael; Bertoni, Vince; Paige-Saeki, Jennifer
Subject: RE: City of Pasadena's Scoping Comments for Draft EIR/EIS for the 710 Gap Closure Project

Thank you for your submission. Please note that your official scoping comment has been received and will be considered.

From: Janka, Bahman [mailto:bjanka@cityofpasadena.net]
Sent: Thursday, April 14, 2011 3:34 PM
To: Ron.Kosinski@dot.ca.gov; SR710Conversations
Cc: Dock, Fred; Beck, Michael; Bertoni, Vince; Paige-Saeki, Jennifer
Subject: City of Pasadena's Scoping Comments for Draft EIR/EIS for the 710 Gap Closure Project

Dear Mr. Kosinski:

Attached is the City of Pasadena's Scoping Comments for the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the 710 Gap Closure Project.

A copy of this letter is also being sent to your office via US Mail.

We appreciate the opportunity to participate in this process.

Bahman Janka, P.E.
Transportation Administrator
City of Pasadena
Department of Transportation
Tel: (626) 744-4610
Fax: (626) 396-8693
E-mail: bjanka@cityofpasadena.net

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 14, 2011 10:42 AM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#66]

Name *	Jae Rand
Email	jaecm1@gmail.com

(you@email.com)

*

Address	860 N. Ave 65 Los Angeles, CA 90042 United States
Select a Subject *	Comment for scoping record

Comment *

I would like to see covered in the Environmental Impact Report (1.) Air quality in the proposed above ground or underground alternatives.(2.) Using other multi-modal approaches instead of more freeways to improve air quality and movement of people and goods.(3.) Impact on street traffic around on-ramps. (4.) Safety if an underground option is chosen. (5.) The true cost of completing this project.

Most major cities in the US, Europe, and Asia have alternate transportation systems to move large amounts of people so cars are not the only alternative. More people would be willing to not use their vehicles if we had alternatives. I have lived in cities with alternative transportation choices and only rarely needed a car.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 14, 2011 10:25 PM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#71]

Name *	Joseph Eisenberg
Email	joseph.eisenberg@gmail.com

(you@email.com)

*

Phone Number	(562) 618-8243
Address	1429 E Florida St Apt 302 Long Beach, CA 90802 United States
Select a Subject *	Comment for scoping record

Comment *

Don't extend the 710 freeway!

Use the money for transit, walking and bikes.

Instead:

1. Remove the SR-710 freeway between the 10 freeway and Valley blvd by transforming it into a boulevard and linear park.

2. Expand transit to reduce car traffic and pollution and spur transit-oriented development.

For example, add a second track to the Metrolink line from LA to San Bernardino and add stations in the San Gabriel Valley. Add express service (run by Metrolink?) along the Blue Line by using the parallel freight track for limit-stop service from Long Beach to LA. And use some of the money to connect the Blue Line and Gold Line with the planned Regional Connector (perhaps the Financial District station could be restored)

3. Create complete, living and green streets in the San Gabriel Vally and Pasadena, that promote safe walking and cycling and create vibrant public spaces, so people don't feel the need to drive to

Hollywood or Santa Monica to get that experience or get exercise.

4. Reduce freight truck traffic and pollution by expanding on dock rail at the Ports of Los Angeles and Long Beach, and encouraging freight to switch from truck to the Alameda Corridor and Alameda Corridor East.

5. To reduce traffic, start charing an anti-congestion fee at rush hour for single occupancy cars, to encourage people to carpool or take transit instead. And take one of the existing lanes and make it a carpool on the 710 (no need to widen the road)

From: Tori Kjer [mailto:torikjer@gmail.com]
Sent: Thursday, April 14, 2011 10:25 PM
To: SR710Conversations
Subject: Re: Feedback - SR-710 Conversations [#67]
I thought I included my address. Here it is: 3335 Dorchester Avenue Los Angeles, CA 90032. Thank you,

Tori

On Thu, Apr 14, 2011 at 6:41 PM, SR710Conversations <SR710Conversations@metro.net> wrote:

Hello Tori,

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your physical address (along with your comment).

I do not see your physical address included in your submission below.

From: Wufoo [mailto:no-reply@wufoo.com]
Sent: Thursday, April 14, 2011 11:22 AM
To: SR710Conversations
Subject: Feedback - SR-710 Conversations [#67]

Name *	Tori Kjer
Email (you@email.com) *	torikjer@gmail.com
Select a Subject *	Comment for scoping record

Comment *	I am writing to voice my concern and vehement opposition to any extension of the 710 freeway. The extension is expensive and will only continue the congestion and air quality problems that currently impact the 710 corridor. Extending a freeway, similar to adding lanes does not address the larger issues related to traffic and congestion. Metro and others should be looking to alternatives including the use of trains to move goods and services in and out of the region. Thank you, Tori Kjer

From: NO 710FWY [mailto:no710fwy@gmail.com]
Sent: Friday, April 15, 2011 9:36 AM
To: SR710Conversations
Subject: Re: 710 Fwy Connector/Tunneling

Address is 5004 Navarro St., LA CA 90032

On Thu, Apr 14, 2011 at 6:59 PM, SR710Conversations <SR710Conversations@metro.net> wrote:
Hello Joe,

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your physical address (along with your comment).

I do not see your physical address included in your submission below.

From: NO 710FWY [mailto:no710fwy@gmail.com]
Sent: Thursday, April 14, 2011 6:56 PM
To: SR710Conversations; ron_kosinki@dot.ca.gov

Subject: RE: 710 Fwy Connector/Tunneling

To Ron Kosinki,

The 710 Tunnel Fwy scoping process and overall process has been dreadfully lacking in any beneficial analysis that would provide those directly affected by the project and taxpayer community any useful information on what is true the purpose of the tunnel project. At this time the El Sereno Community lacks information on the benefits of closing the gap; adverse impacts of the tunnel project ; air quality before and after the project is completed; proposed ways to decrease environmental impacts; project cost and funding source; and alternative plans or why this route is being looked at more than others when other routes appear to be more suitable for tunneling.
Further analysis is needed on the following issues before this project or project route can be chosen.

Please provide an analysis on the following: adverse impacts of the tunnel project; air quality from vents, portals and towers that will be used to vent the tunnel; proposed ways to decrease environmental impacts; project cost and funding source; and alternative plans like rail and buses, bike routes, additional Park area as environmental mitigation.
Another task that is equally important that must be done is public disclosure of all political contributions/donations to all government officials associated in anyway with the 710 project or contributions from any source to politician that represent the areas affected by the 710 fwy.

Sincerely Joe. B

From: Mallory and Janna [mailto:malloryandmccall@yahoo.com]
Sent: Friday, April 15, 2011 3:23 PM
To: SR710Conversations
Subject: Re Gap Closure

Hello,

My husband and I were unable to attend the meeting on April 6 due to disability, but we do want to go on record regarding "closing the gap" through South Pasadena to connect freeways.

For many years we have traveled through that area, enjoying the history and beauty of the old homes. It would be a disaster to move them out of their setting or, even worse, to tear them down. It is not a great inconvenience to get off the freeway for that short distance.

Our vote is a huge **NO** for any project that would move the structures on that land.

Sincerely,

Jan and Mallory Geller

Visit us at www.MalloryandMcCall.com

And for something special, check out

our unusual Boho tribal ethnic Pirate neckpieces at

www.MalloryandMcCall.com/PiratePrimitive.html

From: Oscar Gutierrez [mailto:OscarAGutierrez@msn.com]
Sent: Sunday, April 17, 2011 10:40 PM
To: SR710Conversations
Cc: concerned_nbors@pacbell.net
Subject: Re: YOUR TUNNEL IS BAD FOR US

I am not going to give you my home address so you can put me on your enemy's list of people who oppose your tunnel! Just submit it my comments I live in El Sereno in the 90032 That's All You Need To Know! Oh And I will Fight This Project With Every Legal Means At My Disposal! This will Be A Long Legal Battle!

----- Original Message -----
From: SR710Conversations
To: 'Oscar Gutierrez'
Sent: Thursday, April 14, 2011 6:24 PM
Subject: RE:

Oscar,

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your physical address (along with your comment).

I thought it was included in your submission. However, I do not see it in your e-mail below or in the attachment you sent.

Thank you in advance for sending your address.

From: Oscar Gutierrez [mailto:OscarAGutierrez@msn.com]
Sent: Wednesday, April 13, 2011 8:30 PM
To: SR710Conversations
Cc: ron_kosinski@dot.ca.gov; concerned_nbors@pacbell.net
Subject:

We Never Wanted Your Freeway, Highway, Skyway or Tunnel. We

Reject Any Project You Offer. Dig Your Tunnel Some Where Else!

STOP THE TUNNEL!

Here are some of the many organizations who are opposed to the construction of the unwanted 710 Freeway extension:

Advisory Council on Historic Preservation
Altadena Heritage
All Saints Church
California Office of Historic Preservation
California Preservation Foundation
California Public Interest Research Group **(CALPIRG)**
California Tax Reform Association
Caltrans Tenants Association
Citizens for a Better Environment
Citizens United to Save South Pasadena
City of South Pasadena
Coalition for Clean Air
Cooperative Resources and Services Project (CRSP)
ECO-Cities Council
Eminent Reclaim
Friends of the Earth
Green Capitol
Highland Park Heritage Trust
Highland Park Neighborhood Association
Los Angeles Conservancy
National Parks and Conservancy Association
Natural Resources Defense Council

STOP THE TUNNEL!

Here are some of the many organizations who are opposed to the construction of the unwanted 710 Freeway extension:

National Taxpayers Union
Neighbors for Better Transportation
"No 710", Neighborhoods Opposed to the 710 Freeway
Offices of Antonio Rossman
Counsel for the City of South Pasadena
The Blue Line Construction Authority
Pasadena Heritage
Planning and Conservation League Foundation
Sierra Club
South Pasadena Chamber of Commerce
South Pasadena Preservation Foundation
South Pasadena Unified School District
Holy Family Church
http://www.no710.com/
http://stopthe710.org/
The Hard Working People of El Sereno, California
http://www.VoteOscar.com/

From: L Ibanez [mailto:lidi_ltd@hotmail.com]
Sent: Monday, April 18, 2011 12:02 PM
To: SR710Conversations
Subject: FW: Comments on 710 tunnel/Fwy project

Physical address: 3011 Stockbridge Ave, LA, Ca 90032

--- On **Mon, 4/18/11, SR710Conversations <*SR710Conversations@metro.net*>** wrote:

From: SR710Conversations <SR710Conversations@metro.net>
Subject: RE: Comments on 710 tunnel/Fwy project
To: lidi_ltd@hotmail.com
Date: Monday, April 18, 2011, 7:58 AM

Thank you for sending your comment.

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your physical address (along with your comment).

I do not see your physical address included in your submission below.

From: L Ibanez [mailto:lidi_ltd@hotmail.com]
Sent: Thursday, April 14, 2011 8:54 PM
To: SR710Conversations
Subject: FW: Comments on 710 tunnel/Fwy project

In a recent study done by USC and one of the largest and longest study of its kind USC researchers concluded that children living near busy highways have significant impairments in the development of their lungs that can lead to respiratory problems for the rest of their lives.
This is a pretty significant finding, considering that any proposed freeway project being proposed in El Sereno would have a devastating effect on all surrounding Communities.

I live in the El Sereno neighborhood that will be directly impacted by the 710 Tunnel/Fwy project. My neighbors and I are gravely concerned about the increased pollution that will result from the 710 Freeway Project. More than 100 major studies have been published over the last decade documenting the direct relationship between freeway pollution and health. The proposed 710 tunnel project will concentrate pollution, and noise at various ventilation areas. Freeway pollution and noise increase the risk of developing asthma, cancer, hearing loss, and stress-related diseases. Freeways divide communities and cause pollution. They are a major environmental and health hazard, as recently confirmed by USC studies. Putting the tunnel underground will not make that fact go away. The pollution will still exist but in a more concentrated manner. Currently there is no technology that can eliminate the pollution to levels that are not harmful to humans. No one has offered any evidence to challenge that fact.

This project poses too many unanswered questions and does not adequately address pollution, technology, earthquake faults, political contributions/donations and other issues that demand serious answers and research by outside entities not tied to this project.

Fifty years ago, we were ignorant about the dangers of freeways. Today, these problems are well documented. Fifty years is enough. There is a need for more stringent regulation of the development

of freeways, and of land around freeways.

All parties should consider the following:

* Disclosure of all political contributions from any source for all politicians involved in the 710 freeway or Politicians serving in areas affected by the 710 Freeway .

* Elimination of all 710 tunnel/freeway and related projects in the 710 connector route.

* Use one of the other alternative routes. The El Sereno route is impacted by earthquake faults.

*Consider other alternative modes such as rail, buses, more ports .

* Monetary reparations to all people living next to freeways.

* No more new housing built next to freeways.

* Relocate schools and homes built next to freeways.

* No Valley Connector Road or Low Mode Alternative in El Sereno that will increase traffic in El Sereno

* Build a 6 block wide park on each side along the route of the Freeway if the 710 Freeway connection is built. (No homes for 6-7 blocks on each side of the 710 Tunnel Freeway route from Valley Blvd. To Pasadena.

* Mandatory air quality testing for businesses, homes next to freeways, with data available to the public, on the internat, with no fees.

* Reform freeway funding to encourage safety, health, and ecological protection.

* Health Insurance fund set up for living near the 710 Fwy and impacted by the 710 Fwy.

There is a need to be more sensitive to the danger of freeways, and that people who have suffered from freeways be compensated for their suffering.

Sincerely,

Lily Ibanez

From: Mallory and Janna [mailto:malloryandmccall@yahoo.com]
Sent: Tuesday, April 19, 2011 12:26 PM
To: SR710Conversations
Subject: RE: Re Gap Closure

Sorry I forgot our address. It is:

Jan and Mallory Geller

303 S. Avenue 57 #30

Los Angeles, CA 90042

Once again, our message is:

Hello,

My husband and I were unable to attend the meeting on April 6 due to disability, but we do want to go on record regarding "closing the gap" through South Pasadena to connect freeways.

For many years we have traveled through that area, enjoying the history and beauty of the old homes. It would be a disaster to move them out of their setting or, even worse, to tear them down. It is not a great inconvenience to get off the freeway for that short distance.

Our vote is a huge **NO** for any project that would move the structures on that land.

Sincerely,

Jan and Mallory Geller

Visit us at www.MalloryandMcCall.com

And for something special, check out

our unusual Boho tribal ethnic Pirate neckpieces at

www.MalloryandMcCall.com/PiratePrimitive.html

--- On **Mon, 4/18/11, SR710Conversations <*SR710Conversations@metro.net*>** wrote:

From: SR710Conversations <SR710Conversations@metro.net>
Subject: RE: Re Gap Closure
To: "'Mallory and Janna'" <malloryandmccall@yahoo.com>
Date: Monday, April 18, 2011, 8:04 AM

Jan and Mallory,

Please note that if you would like your comment to be considered in the official administrative record, please write back and provide your physical address (along with your comment).

I do not see your physical address included in your submission below.

Thank you in advance.

From: Mallory and Janna [mailto:malloryandmccall@yahoo.com]

Sent: Friday, April 15, 2011 3:23 PM
To: SR710Conversations
Subject: Re Gap Closure

Hello,

My husband and I were unable to attend the meeting on April 6 due to disability, but we do want to go on record regarding "closing the gap" through South Pasadena to connect freeways.

For many years we have traveled through that area, enjoying the history and beauty of the old homes. It would be a disaster to move them out of their setting or, even worse, to tear them down. It is not a great inconvenience to get off the freeway for that short distance.

Our vote is a huge **NO** for any project that would move the structures on that land.

Sincerely,

Jan and Mallory Geller

Visit us at www.MalloryandMcCall.com

And for something special, check out

our unusual Boho tribal ethnic Pirate neckpieces at

www.MalloryandMcCall.com/PiratePrimitive.html

From: Jennifer Perez [mailto:jennifer1069@sbcglobal.net]
Sent: Friday, April 15, 2011 10:18 AM
To: SR710Conversations
Subject: 710 traffic mitigation alternative

Hello,

I am opposed to connecting the 710 and the 210 freeway. I think that we can improve traffic congestion by having signal synchronization it is a cost-effective way to increase street and road capacity without major new construction. Orange County Transportation Authority, in partnership with California

Department of Transportation (Caltrans), had success in Orange County. Why not Alhambra?

Sincerely,

Jennifer Perez

3127 Sheffield Ave.

Los Angeles, CA 90032

Appendix E – Scoping Meeting Transcripts, Comment Cards and Sign In Sheets

E-1 – San Gabriel

SR-710 Conversations
Public Information and Education Meeting

ELECTED OFFICIALS/REPRESENTATIVES SIGN-IN						
Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
Eugene Sun	City of San Marino	council member	2200 Huntington Dr., San Marino, CA 91108		626-309-0000	esun@earthlink.net

Jefferson Middle School, March 15, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
Dr Tom Williams	LA32 NC	4115 Barrett Rd	CA 90032	323-528 9682	ctwilliams@yahoo.com	Y	Y	Y
Sean Telles		5618 N. Muscatel Ave	San Gabriel	626-679-4645	sean.telles@gmail.com	Y		
Lorianne Salazar		"	"	"	lori4nne@gmail.com	N		
Algis Marciuska	City of San Gabriel	PO BOX 130	San Gabriel	(626)308-2806	amarciuska@sgch.org	YES		
Arief Naftali	ADVANTEC CONSULTING	21700 E. Copley Dr Ste 350	Diamond Bar	(909) 860-6222 Ext. 104	ariefnaftali@advantec-usa.com	Y		
Daniel Walker		7416 W. 82nd St.	Los Angeles	(310)503-2449	milowalker@ca.rr.com	Y		
Carol Barrett	City of San Gabriel	425 S Mission Dr	91776 San Gabriel	626-308-2806	cbarrett@sgch.org	y		

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
Jeff Schwartz		P.O. Box 367 Monterey Park	Monterey Park 91754	626 459-9011		Yes		
Garrett Damrath	CT							
HARLEY MARTIN	URS	2020 E. FIRST ST. SUITE 410	SANTA ANA	714-648-2899				
Endi Zhai	Kleinfelder	2 Ada, Ste 250 Irvine, CA 92618	Irvine	949-727-4466	ezhai@kleinfelder.com	Yes		
Lan Saadatnejadi	PB	444 S. Flower St. #3700 LA, CA 90071	LA	213-447-5366	SaadatnejadiL@pbworld.com	Yes		
Wally Sohgren	Resident	221 N. ROSEMONT BL. SAN GABRIEL 91775	SAN GABRIEL	2890642	WLDHGREN@AOL.COM	YES		
Susan Gilmore	Metro				gilmores@metro.net	Yes		
JOANNE MCCKEE	SO PHAS	—	910 90	—	—	—		
DAN FARKAS	CONSULTANT		91106	626-793-8451	~~dan~~ danfarkas@charter.net	YES		
NAT READ	Read Communications	100 E. CARSON ST. #200 Pasa	91103	626 578-0705	nat@natread.com	Yes		
ARMANDO RAMOS	RAMOS/CS		91109	626	aramos@ramoscs.com	✓		

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選“yes”或“no”）
MICHAEL PULCIANO	SELF	524 COOLIDGE DR	SAN GABRIEL 91775	626 458 0239	SPULCIANO@SBCGLOBAL.NET	YES		

Jefferson Middle School, March 15, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
SAM BURGESS	NO 710 ACTION COMM		SO. PAS.		SAMBURGESS@SBCGLOBAL.NET			

Jefferson Middle School, March 15, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
STUART WARREN	HATCH MOTT MACDONALD			626 695 7170	stuart.warren@hatchmott.com	Yes.		
MARY CAMMARANO	SAN GABRIEL			626 286-0565	marycamm@SBCglobal.net SG	yes		
Mike CAMMARANO	SAN GABRIEL.			626 286.0575	Mike Cammarano	yes		
DON HAGSTROM	CITIZEN	11158 BERTHA PL	CERRITOS 90703	909-969-4769	don_002@yahoo.com	YES		
DAVID WOO	HNTB	200 E. SANDPOINTE AV	SANTA ANA	(714) 460-1654	DWoo@HNTB.COM	YES.		
Juan Carlos Velasquez	CH2MHILL	1000 Wilshire Blvd ~~LACA~~	Los Angeles	213.228.8224	jvelasqu@ch2m.com	✓		

CALTRANS / METRO
SR-710 CONVERSATIONS

PUBLIC SCOPING MEETING

TUESDAY, MARCH 15, 2011
JEFFERSON MIDDLE SCHOOL,
SAN GABRIEL, CALIFORNIA

San Gabriel, California, March 15, 2011
-0-

MS. McCORMICK: We're actually going to get started right now. So if you'd like to come up and have a chair, that would be great.

My name is Mary McCormick, and I will be your moderator this evening, and I'm with a company called MBI Media this evening.

I would like to invite two of our translators up to the podium to get us started this evening. We both have translation in Spanish and in Chinese -- in Mandarin, and we would like to make sure that anyone in the audience who is interested in getting some information translated that we are able to do that for you this evening, so I would like to have them come up.

(Whereupon interpreters addressed the audience, but it was not recorded.)

MS. McCORMICK: Thank you, Joanna. You can have a chair.

I'd like to -- we are very pleased to have an elected official with us this evening. I'd like to introduce him. It is Mr. Eugene Sun, who is a city council member from San Marino.

UNIDENTIFIED SPEAKER: He just left.

MS. McCORMICK: Oh, he just left. Well, it was nice of him to come by.

I wanted to talk to you a little bit about tonight. Tonight is our very first scoping meeting, and I want to tell you a little bit about our series one and series two. There are a total of 12 different meetings. As you can see around the area, there are a variety of different stations. And here at station three you'll see what is highlighted conversations with series one and two.

So what we did, we actually have some really detailed discussions with our community members from six different cities, and we worked with them to find out their needs and thoughts as citizens, as someone who is working in the community, and then region-wide. We talked about two different areas. We talked about the commonality, and we talked about the community that they live in, the concerns they have for transportation concerns, also local regionally or local community region-wide. And then we have considerations, and that's exactly considerations for the future.

We didn't want -- we wanted you to actually see the posted notes that we did. So we actually shot photos of them, and we actually labeled them per day for the city. And it's really interesting reading. You can

actually see the notes, the actual notes that we took in these meetings.

In series two was a series on CEQA and NEPA, which is the California Environmental Quality Act and the National Environmental Policy Act. And that was a training on the actual parallel process that takes place during an environmental document. I would encourage you to take a look at the boards that we have at station three and also as you walked in here, which allows you to see multiple places where public participation is encouraged.

We actually are also going to have Garrett Damrath from Caltrans this evening. He's going to talk a little about the process. He will be giving you a brief overview of the scoping process, and I'd like to introduce Garrett Damrath from Caltrans.

MR. DAMRATH: Good evening, and thank you very much for taking time out of your day to participate in the scoping process for the 710 closure project. Scoping, as the U.S. Council on Environmental Quality defines scoping, is an early open process for identifying important issues related for these actions. And that was in 1978. At that time it was mostly dealing with agencies -- between the agencies so that we can make sure that everybody, everyone, all the agencies

had their concerns addressed. But it slowly became more of a public outreach process to get the public's input into the scoping process. As you can see, it now has gotten to be something where we have 18 meetings -- we have scoping for the public, and we have one agency designated.

I want to stress one thing, that no decisions have been made at this point. We are here primarily -- our primary purpose is to collect suggestions. Our goal as the preliminary team is charged with the responsibility of ensuring the environmental issues of the communities are addressed in the decision-making process.

So why are we here? The previous studies indicate the 710 gap closure or gap contributes to growing congestion on nearby freeways and arterials. In 2003 ROD was rescinded, and continued project development was prohibited without new environmental work. Then Measure R passed with a two-thirds majority in L.A. County voters to fund bills that addressed the transportation problems throughout the county including the gap. And the Metro Board has adopted a motion to move forward with the environmental process.

So scoping for solutions -- we've convened a series of 18 meetings. Metro and the consultant group

has done a wonderful job providing engaging and instructional dialogue and maintaining an open and transparent process. We have solicited broad participation and input and we facilitate and continue these SR 710 conversations through social and media platforms.

The purpose of scoping is pretty simple. We want to identify the issues to be addressed in the environmental documents. And so we are asking for input from the agencies and from the public to notify us of what we should be studying. The lead agencies for this project under CEQA and NEPA is Caltrans. We were delegated the federal agency or federal authority under NEPA from the FHWA. So we have that. And we would like our comments by April 14th.

The role in scoping is to be early in the process as stated by the Council on Environmental Quality. We want input from the public, federal, state, and local agencies. What we want to do is identify potential alternatives, issues, and impacts to be analyzed, and the level of detail in these analyses. And how we can -- let us know how you can give all this information? You can give us oral testimony. We also have a range of social media outlets in which you can provide comments as well as written comments.

This is the study area that we are presently looking at. Here's a quick list of the -- well, not very quick -- of the preliminary purpose and need for the project. As you can see, there's a lot here.

We want to improve regional mobility and accessibility for the movement of people, goods, and services. Reduce circuitous out-of-direction travel on the network. Reduce congestion on north-south arterials and local streets currently adversely impacted by diversion of freeway trips. Improve regional travel time savings and thereby reduce loss of productivity associated with congestion. Provide additional connectivity in the regional network for use by public transit. Improve regional and local mobile source air quality characteristics. Reduce greenhouse gas emissions from mobile sources. Provide a project that constrains impacts in local communities to acceptable levels. And finally, develop a financially feasible project taking into consideration cost effectiveness and viable funding strategies including public/private partnerships.

Our project alternatives -- there's been a lot of questions on what we're looking at, and we heard from you through the first two series of these meetings in some of the things you might see. One of the

alternatives is to route neutral surface and/or subsurface highway or freeway; heavy passenger and freight rail improvements; bus and light rail system improvements including the first and last mile; local street upgrades including signal synchronization, pedestrian and bike access improvements; traffic management systems; and the no-build.

A few factors that we're taking into consideration are multimodal transportation landscape; emerging environmental issues and advances in technologies; potential funding and revenue sources; and project delivery and procurement methods.

Our project milestones are pretty basic. We have public outreach and issuance of the NOI, NOP, and public scoping meetings which is where we're at right now; the preparation of the Draft Environmental Impact Report/Environmental Impact Statement; and then have public hearings. We will prepare a final environmental document, and then a decision would be made and a record of decision and notice of determination filed.

The environmental document type, of course, as I say, will be an Environmental Impact Report/ Environmental Impact Statement under CEQA and NEPA.

And for all of your written comments during the scoping, please address them to our Deputy District

Director, Division of Environmental Planning, Ron Kosinski, and his address is here readily available.

And I would like to thank you for your interest in this very important project. I will turn it back over to Mary.

MS. McCORMICK: Thank you. So to guide, this is a special night because we're actually going into scoping, and that will allow you the opportunity to have those comments go on the record. It actually goes in the written record.

So I'd like to take just a few minutes to talk about the protocol for that so you will understand how you can do that. I have here two speaker cards. If you would like to speak this evening, we are actually going to have -- we have a court reporter here who puts it into the administrative record. So it's a legal record.

And if you would like to speak and have your oral remarks put into the record, please fill out a speaker card, and my staff will bring it up to me. So it looks like this (indicating). And at that time I will call up the person who's on the speaker card, and then we'll give the second person behind them to kind of get in the queue so you will know that your name will be called from the queue.

We're actually going to be limiting our

comments to two minutes, and we want to make sure that the record -- it adequately compiles the record. If it exceeds two minutes, we want to talk about how you can continue your comments, which is something that's really important. We have actually live Web input right here in this room. You can actually go online and continue your comments online in the legal record, so tonight is the beginning of that.

Also we have someone here that if you would like, we can type it in for you. You can actually have someone assist you in typing your comment, and we'll keep a legal record of that also. So that's a computer that is not live, but is a hard copy.

Also in addition to that, when you come up and speak, please speak slowly because the court reporter really is tracking each one of your comments, and we want to make sure that she gets all of that. And you need to give us your first and last name and then your address, your full address because your full address is part of the record. It's real important you give us your full address.

You can also -- as Garrett mentioned, a lot of the comment cards you can fill out. There are several boxes around the room which you can drop them in, and you can also take them home because you'll have them in

your information packet. You can take them home, think about what you heard tonight, and you can mail them. You can mail them right to Ron Kosinski at Caltrans. He is the person taking them, and the address is on there.

Let me -- oh, also just a comment on station six. We have a -- for the very first time I wanted to remind you, we're going to have a virtual meeting. I don't know if you've ever been involved in that before, but you can actually go online, and it's a three-week meeting. Any time you can register. It is posted by Metro and Caltrans. It begins on March 21st at 6:00 p.m., and then after I believe it's 6:00 to 8:00. And then after that it actually goes on demand, and it's going to run all the way to April 14th.

So even if you couldn't come to a meeting like this tonight, you can actually go online and get all your issues put in the record as well. And don't forget, we're also on Facebook and Twitter, and you can e-mail information -- if you want information, you can e-mail to sr710conversations@metro.net.

So now we are actually going to go on the record, and I will call up my first speaker, and it's Dr. -- thank you -- Dr. Clyde Williams, and the second person behind that will be Mr. Daniel Walker.

DR. WILLIAMS: Dr. Clyde Williams, 4115 Barrett

Road, El Sereno, Northeast Los Angeles. By the way, El Sereno is not a separate city equal to Los Angeles. It is part of Los Angeles, which is not indicated in this Notice of Preparation for the Federal Register.

First off, I'd like to get copies of all the slides that have been presented tonight because they are not the same as provided before, nor in the brochure that has been provided here. There is some additions.

So there's a lot of purpose and needs, purpose and needs and a defined best case project is required in order to propose alternatives, in order to assess potential significant impacts, and in order to assess mitigation for those impacts. So without a least case project, it's difficult to define all possible projects. So I'd like to have somebody please define all possible projects within the area from I-5 to I-605, from 210 to 10. What do you mean by all possible projects? Also will e-mail submittals be incorporated into the scoping report? When will the scoping report be prepared in accordance with NEPA? Thank you.

MS. McCORMICK: Thank you, Dr. Williams.

Mr. Walker.

MR. WALKER: Okay. Good evening, everyone. My second time here. I didn't get to make it to the other 16 or so meetings before that. I just want to thank

everybody, all the staff, and the city people that were here. I'm not going to agree with everybody, I'm sure, but I think it shows quite a tribute to democracy, that there are people here when there are so many other things going on.

MS. McCORMICK: Mr. Walker, thank you for your response. Could you please give us your address, please.

MR. WALKER: Yes, 7416 West 82nd Street in Los Angeles.

MS. McCORMICK: Thank you.

MR. WALKER: I am a supporter of getting this project done. I think the need is clear. I saw it again on the way here. I think there's a lot of alternatives; there's a lot of other good ideas of things that need to get done in the city. But in this corridor, there's no question that we need to build a 710 tunnel.

So -- but I would like Caltrans to study a number of different features of this to make it efficient, to make it minimally intrusive to the good communities in the area, and it can't be done such that there's little or no air pollution effects into the cities nearby; scrubbing of the air vents; how many lanes would it take to meet the needs of the

community -- three lanes or four lanes -- is it going to have HOV lanes; will it be toll? There are a lot of good things.

I think I'll submit some of my questions, but I think basically the message is that we need to get this done. There are a lot of other light rail and bike projects as well that I think many of us support, but to move the people, we need to build this tunnel. We need to get the 710 connected, and we've got to get it done sooner rather than later.

That's my main message, and I hope I get to see it in my lifetime. Thank you very much.

MS. McCORMICK: Thank you very much.

I'd like to call up Mary Cammarano, and then behind her is Sean W. Telles. Mary.

MS. CAMMARANO: Good evening. I'm Mary Cammarano. I live at 1218 Palm Avenue in the city of San Gabriel. And as a former council member, as a former mayor of our city, the City of San Gabriel has been on record continuously in support of this project. We need relief from commuter traffic. Traffic everywhere, I know, is a problem, but we are feeling it. As the neighbors in Alhambra, we get the overflow in the city of San Gabriel.

And I've always stated that this is a regional

problem; this is not a two-city problem -- a three-city problem, and it just never ceases to amaze me that cities that are 15 miles away are objecting to the closure of this freeway. It just doesn't make sense to me. If someone could really explain that to me, I'd appreciate it.

But for our city and for the people of our city, people are in a hurry. We have the economy which dictates that members of the family still have to work, and work means commuting, and if we can lessen that burden a bit on our family with gas going up to $5 a gallon, it would certainly make a big difference.

So I just want for the record, again, to emphatically state that is a regional problem. If this could be completed -- if this freeway should certainly be completed, we would all benefit. The region will see a total, total benefit to each and every one of us, our children, our grandchildren in the future.

So on behalf of San Gabriel, I want just that be known on the record. Thank you.

MS. McCORMICK: Thank you very much.

Mr. Telles, thank you. Your name and address, please.

MR. TELLES: My name is Sean Telles. I live at 5618 N. Muscatel Avenue, San Gabriel, California, across

the street, and I'd like to welcome you to my elementary school and junior high school.

First, before we get to this, I wanted to say that I think it's somewhat disrespectful and wasteful to print single-sided all these packets when they can be doubled. And the same thing with this page that says what we can do -- that whole page which is a paragraph of information in color which seems kind of crazy.

So the first thing I want to say is how many people took public transportation here. Since we have no public transit here, so I don't think anybody did. I walked here, but I live across the street, so I have an excuse. So I think that shows something that it doesn't work. Public transit doesn't work. That's why no one takes it. That's why everyone drives because getting home is the hardest part. It takes twice as long getting home than going somewhere usually.

I think most people believe that the 710 isn't going to change our commute. I think you have an east/west problem, not a north/south problem. That said, I think it's unfair to people's health. We don't have a freeway going through there because it was part of the plan.

But you know, I guess that's it. I don't think -- I don't see us going toward the Metro public

transportation. I should be able to go to Downtown L.A., watch a show in Hollywood, take the Red Line, and after the show come back, but I can't because it stops at 11:00 or 12:00 or whenever that is. So that's what I would like to see all of the money and this power that's going because I don't think extending the 710 is going to add as much as that. Thank you.

MS. McCORMICK: Thank you very much.

Mr. Don Hagstrom. And then Mr. Nat Read.

MR. HAGSTROM: Okay. My name is Don Hagstrom. My address is 11158 Bertha Place in Cerritos. So for my city, as you can tell, it's a little bit far from here, but I do commute quite a bit to the Metro Los Angeles area, and I'm very aware of the issues of regional transportation. And for the record, I am very much in favor of this project.

One thing that I want to bring up, I don't think it's brought up enough in transportation. We always ask the question, What are the impacts of building the project? And we never ask, What is the impact if we don't build the project? How many people are suffering because in East Los Angeles on the I-5 corridor, the 101 corridor, the 605 corridor, the 10, and everything else because we haven't built this project? We haven't finished the route. And so

everybody has been around -- it impacts neighborhoods on surface streets. It impacts on the freeways. It's not fair to everybody else. And as was just mentioned, this has been a part of a regional planning for a long time. There are other cities that all of a sudden are against it, and yet they have their mode of transportation secure for them.

There are ways I think this project can be mitigated and done very well. We can have sound walls and rubberized asphalt like they do in Phoenix. We can make it quiet. You're talking about some people. I think it would be a pretty significant percentage grade going up from Alhambra to Pasadena, so I don't think nearly as many trucks would use this route as many people think. So I think it would be used more for car commuters anyway but a very, very important route, and it would make everybody's lives smoother.

So we need to go back to an old idea that we had a long time ago, and I think people need to work together. We need to work together as a region and not allow a few cities or a few individuals to stand in the way of everybody else. So thank you very much.

MS. McCORMICK: Thank you very much for your comments.

Mr. Read.

MR. READ: Thank you very much. I'm Nat Read. I've been involved in this issue for 40 years.

MS. McCORMICK: Give us your address, please.

MR. READ: Nat Read, 100 East Corson Street, Suite 200, Pasadena, 91103.

Forty years, twenty of those as a citizen advocate who felt strongly about the issues, twenty years as a paid representative of the 710 freeway coalition which is a coalition of business, of labor, of cities, of some minority organizations and other organizations.

I'm a rail guy, former vice president of a railroad and an advocate -- paid advocate for the Blue Line, Gold Line -- setting up, getting that built. But highways are an important part of our mix, and I think what Sean Telles said resonates, and I'm there. We need more public transit. We need more emphasis on that, but not at the expense of the other modes that make our total transportation system work. I say that as a rail guy.

Measure R gives us the opportunity of an entire generation to fix a problem. There are four and a half miles of our freeway system that are missing. Our freeway system doesn't work without that. So the low-build alternative was proposed, studied, found to be

worse than nothing. Why is it still advocated? Because frankly, that's the only thing the opponents have. I would ask you to complete this study thoroughly but quickly. Thank you very much.

MS. McCORMICK: Thank you for your comments.

Is there anyone here who would like to fill out an additional speaker card to speak this evening because that is all I have right now?

Oh. Joanne Nuckols.

MS. NUCKOLS: Hello. My name is Joanne Nuckols. My address is 1531 Ramona Avenue, South Pasadena. I have been involved with the 710 fight for about 25 years, and I would live about a block from the proposed meridian route -- proposed surface route.

Couple of comments I'd like to make in response to comments made here tonight. If the tunnel is ever built, we've been told by the officials that it will only be built as a toll facility. There is not enough public money to build it. It would be a toll facility, and the current estimates that are being thrown around by Metro is $3 billion for construction only. You have to add another at least 25 percent, but that $3 billion is way underestimated.

Currently one Metro Board member is attempting to get an updated cost based on the big dig of another

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tunnel project that ended up being seven times what they originally estimated because those estimates are always small to get people interested in the project. SKAG estimated that the cost of the tunnel would be $11.8 billion. So I think there is something funny going on with all these numbers, and I think the public needs to be educated as to what the actual cost will be.

And if anybody has read the Parsons Brinckerhoff report from 2006, you'll see that the gases cannot be scrubbed; they cannot be mitigated. The scrubbers are only for particulate matter, not for NOx and all the other pollution produced by automobiles. So there is no way to mitigate the air pollution.

And also, if you read the Parsons Brinckerhoff report, you will see that there will actually be more traffic produced by the people that will not use the tunnel because it's a toll facility and also because even if it was free, they would not go in that facility. So there's a lot of information that's lacking for people in the public to actually know what the tunnel would actually be.

Now, in response to the low-build study, a federal judge has found that the Caltrans study of the low-build was totally inadequate, and currently there is an injunction in place on the surface freeway, and that

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the Environmental Impact Report -- impact study was found to be very efficient, so there has been an injunction actually in place on the project since 1973. It's not clear if the injunction applies to the tunnel, but I'm assuming it probably does.

So for this process to move forward, there's a lot of (unintelligible) and a lot of legal issues that are really going to get us in more quicksand. So I'm saying that these need to be cleared up before you continue on writing an Environmental Impact Report -- the draft. Thank you.

MS. McCORMICK: Thank you.

I'd like to offer an opportunity for anyone else in the room to come and make comments.

Okay. I want to thank you for participating in a very important environmental scoping process, and your comments are important, and they will be heard, and they will be read. We want to hope that you will continue to work with us and participate in the process.

And you did receive in your information packet at the station is a lot of the upcoming dates for the additional scoping meetings as well as the calendar that has been provided to you. And we would like you to continue to send comments electronically. As I mentioned earlier, we have the virtual meeting, but you

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can always send your comments electronically as well.

We would encourage you to ask your friends and neighbors to continue in the scoping process and to have them come. And remember that this information is going to be collected and will be put into the administrative record until April 14th of 2011.

So thank you so much for your time. I guess that closes out the scoping for this evening. If you'd like to get more information from around the stations, please do so. You're welcome to stay.

SR-710 Conversations – A Series of Information Meetings

Tuesday, March 15, 2011

NAME: MICHAEL PULCIANO

ADDRESS: 524 COOLIDGE DR CITY: SAN GABRIEL ZIP: 91775

REPRESENTING: SELF

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

YOU SAID IT all in the proposed purpose and Need Statement

I cant wait for it to Start.

I HAVE MY PICK + SHOVEL READY

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

Tuesday, March 15, 2011

NAME: Dr Clyde Will

ADDRESS: 4115 Barrett Rd CITY: LA ZIP: 90032-1712

REPRESENTING: LA32 Neigh. Council / Sierra Club Transp Comte

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

- Extend NOP Scoping period to April 28
- Add more Scoping meetings – 10 – 2 La Canada Flintridge and 6 in LA – Northeastern Districts, and 1 each in Monterey Park & Rosemead
- Add Alternatives for south stub of 710 to Mission Rd, Huntington/Main, and Hellman north stub of 710 to SR 110 and from SR 110 to I 210/710/134

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

Tuesday, March 15, 2011

NAME: larry york

ADDRESS: 4279 n, maxson rd. CITY: el monte ZIP: 91732

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

we need this freeway completed as soon as possible.

Note: Comments specifically for scoping will be accepted into the official administrative record beginning February 28, 2011 concurrent with publication of the Notice of Intent /Notice of Preparation. Scoping comment closing date will be April 14, 2011. Comments received prior to February 28, 2011 will not be included in the official administrative record.

Metro Caltrans

E-2 - Alhambra

SR-710 Conversations
Public Information and Education Meeting

ELECTED OFFICIALS/REPRESENTATIVES SIGN-IN

Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
Adele Andrade-Stadler	Alhambra SD.	President	1515 Mission Rd Alh CA 91803		626 9	andrade.stadler@k12.ca.us
Maria Unzueta	Assm Mike Eng	Field Rep				maria.unzueta@asm.ca.gov
MARIA MURRAY	Planning Commissioner		1708 So. Stoneman Ave Alhambra.	91801	Work (213)217-7262	mmurray@mudh20.com
JOHN LODGE	PLANNING COMMISSION		2148 S FREMONT AVE 33 ALHAMBRA	91803	626 695 0624	

Alhambra Civic Center Library, March 16, 2011

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[illegible]						
DAN HUTCHINSON	CITY OF ALHAMBRA	TRANS, COMMISSIONER	501 N. CAMPBELL ALHAMBRA, CA	91801	626.297.9322	CUNITZ7820@MYPACKS.NET
RICKY CHOI	CITY OF ALHAMBRA	CIVIL SERVICE COMMISSIONER	3016 W. NORWOOD PL. ALHAMBRA, CA	91803	626-688-4010	RICKY.Y.CHOI@GMAIL.COM
WINGT HO	CITY OF ALHAMBRA.	DESIGN REVIEW BOARD.	2517 W GRAND AVE ALHAMBRA CA.	91801	626 379 9877.	wingkho@gmail.com

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Barbara Messina	City Council	Council	1101 So. 2nd ST	91801	289-9720	
GARY FRUEHOLZ	ALHAMBRA PLANNING COMMISSION		2221 WESTBORO AVE ALHAMBRA, CA	91803	626-318-9436	garyf.fruehdz@dilbeck.com

Alhambra Civic Center Library, March 16, 2011

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Timothy LOC	The Alhambra Source	Assistant		Alhambra 91801	626 315-4938	timothyloc@gmail.com
MICHELLE GASTELUM	SCE	PMGS.	300 N. LAKE AVE. #320	PASADENA, CA.	626 449-9052	MGD SUMMIT-ENGINEERS.COM
Jim dela Loza	AECOM	SVP	300 S. Grand Av L.A 90027	LA CA	213 200-5449	delaloz@AECOM.com

Alhambra Civic Center Library, March 16, 2011

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Public Information and Education Meeting

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Gayle McKinney		333 W Main #617 Alhambra	Alhambra	626 399 4149	gaylemckinney@Yahoo.com	yes		
Jason Roach	Caltrans							
David Miranda		711 S. Chapel Ave	Alhambra 91801	323.633.6571	dmiranda@mirandaphotos.com	X		
Chris Paulson		521 Alahmar St. Alhambra	"	626-570-5011	cpaulson@cityofalhambra.org	yes		
Kevin Johnson	Fehr + Peers	201 Santa Monica Blvd	Santa Monica	310-456-8818		no		
EDWARD NEILL		1105 LEONARD AVE	PASADENA	626 351-9564				
Enrique Garcia	City of Alhambra	329 E. Adams Ave, Alhambra	91801	626-277-5815	garcia10@USC.edu	yes	si	
BRUCE SCHMITH	HNTB	200 E. SANDPOINTE AVE SANTA ANA, CA	92707	714-460-1600	BSCHMITH@HNTB.com	YES		
Terrazas, Veronica		5354 Almont St	90032	—	—	No		
JOANNE NUCKOLS	—	—	—	—	—			

Alhambra Civic Center Library, March 16, 2011

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Carlos Montez		4907 Glacier Dr	90041		flornito@yahoo.com	Y		
Ken Chan		1413 W. Cameron Ave	91803					
Martha Vanegas		2705. montezuma Ave	91803	626.629.83.25				

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Jaime Garcia	Parks & Rec Alh	21 E. Beacon ST APT H	Alhambra, 91801	626/281-0252	jgarciabbada@yahoo.com	yes		
Alicia Martinez	Ø	230 W. Ramona Rd	Alhambra	626-695-1638		no		
Angie Gonzalez	Ø	224 W. Ramona Rd	Alhambra	626-573-3245		no		
Lee Dolley	LCD PC	111 S. First	Alhambra	cell 310 917 7704	ldolley1@verizon.com	yes		
Frank Pulciano		605 W. Granada Ave	Alh	work 626-458-9838				
Florida Pulciano		" " "	"	"				
NABIL SEJAAN	—	1920 LOS ROBLES	SAN MARINO		NABILSEJAAN@HOTMAIL.COM.			
FRANK BODEMAN		114 So ELECTRIC AVE	ALHAMBRA	6269439941	Fbodeman@yahoo.com	YES		
Yoga Chadha		4000 Wilshire Blvd	Los Angeles					
GARY FRUEHOLZ	ALHAMBRA PLANNING COMMISSION	2221 WESTBORO AVE ALHAMBRA, CA 91803	ALHAMBRA	626-318-9436	gary.frueholz@dilbeck.com	yes		
Gloria Osuna	~~[illegible]~~ Resident	1714 Arriba Dr	Monterey Park	626 458 9744	—	—	—	

Alhambra Civic Center Library, March 16, 2011

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Lisa S. Metayer	Resident	2413 Warwick Rd.	91803	(480) 600-8065	lisasmetayer@gmail.com			
Stephen Trapani	Alh Resident	508 S. Chapel Ave	91801	626-664-4318	soertrap@hotmail.com	Yes		
Annette Arizmendez	Housing Commissioner	1021 S 2nd St.	91801	626-284-7857				
AL DIAZ		240 HAMPDEN TER	91801					
GARY PETERSEN	PARSONS							
Blanca R Vanegas	Resident	2705 montezuma	91803	626)281 0920		Yes		
Dan Louis	URS	915 Wilshire Bl.		714.615.3685	dan_louis@urscorp.com	Yes		
MARY ANN PARADA	NO 710 ACTION COMM	1710 RAMONA AVE	91030	323-255-4042				
Carolyn Ortiz		1704 S. Stoneman Ave.	91801	818/317-7207	caromo17@yahoo.com	Yes		
Luis Arizmendez	Transportation Commissioner, Alhambra	1021 S. 2nd St.	91801	626-284-7857	MR_Louie@att.net	Yes		
Daniel Wong	Kimley Horn	765 the City Drive, #400	92868	714-705-1318	daniel.wong@kimley-horn.com	Yes		
Lisa Maurath	PB	444 S Flower St	CA 90071	2138965631	maurath@pbworld.com	Yes.		

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Dr Clyde Williams	LA32NC	4115 Barrett Rd	LA 90032	323-528 9682	ctwilliams@yahoo.com	Y	Y	Y
Dan Bednarski	n/a	1829 S. Olive Ave Apt A	Alhambra	650-930-0762	dan@alhambra123.org	Y		
Tom Ionta	CH2M Hill	1000 Wilshire	Los Angeles	714-435-6238	tionta@ch2m.com	Y		
OWEN GUENTHARD	ALHAMBRA CHAMBER OF COMMERCE	104 S. FIRST ST	ALHAMBRA 91801	626 282-8481	oguenar@yahoo.com	Y		
Michael Meyer	Outpost HOA	7007 Macapa Dr. Los Angeles CA	Los Angeles 90068	213-802-1708	mpm@iteris.com	Y		
Lori Kremer	Alhambra Civic Center Library	101 S. First St. Alhambra, CA	Alhambra, CA 91801	626-570-5008	lorik@alhambralibrary.org	Y		
G Valladolid	—	—	"	—	—	N		
EUGENE KAO		585 W. DUARTE RD, #115	ARCADIA 91007	626-447-7064		N		
SAM BURGESS	NO 710 ACTION COMMITTEE		SOUTH PASADENA		SAMBURGESS@SBC.GLOBAL.NET			
Garrett Damrath	CT							
Hank Fung	Southern CA Transit Advocates	4002 N Lang Covina CA 917	Covina		hank@bleeble.org			

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Julio Fuentes	City of Alhambra	111 S. First St Alhambra, CA 91801 CITY OF ALHAMBRA	Alhambra, CA	570-5010				
STEPHANIE JOHNSON		1920 LOS TURBLES AVE SAN MARINO 91108						
BOB BURNE	KIMLEY-HORN	835 WILSHIRE, LA, CA	90017	213-489-1238				

Alhambra Civic Center Library, March 16, 2011

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Alemendarez	—	—	—	—				
Janet Orrin		801 Meridian	S. Pasadena					
AMIN KHALILI	TGC	116 N. MARYLAND #130 Glendale 91206	Glendale	949 466-7413	AMIN@THEGCREW.COM	Y		
Paul Guptill	Kleinfelder	Los Angeles		949-727-4466	pguptill@kleinfelder.com	yes		
Allison Morrow	Caltrans	100 S. Main St	LA 90012	213.897-3247	allison-morrow@dot.ca.gov			
Le Chen	Caltrans	100 S. Main St	CA 90012	213 897-4595	Le-chen@dot.ca.gov	No		
STUART WARREN	HATCH MOTT MACDONALD			626 695 7170	Stuart.warren@hatchmott.com	Yes.		
Teresa Luz	ABC	313 S.O. Cordova St	91801	626 588-2854				

Alhambra Civic Center Library, March 16, 2011

MBI MEDIA

PUBLIC SCOPING MEETING

In the Matter of:)
)
SR-710 NORTH GAP CLOSURE)
)
_____)

REPORTER'S TRANSCRIPT OF PUBLIC COMMENTS

ALHAMBRA CIVIC CENTER LIBRARY
101 South First Street
Alhambra, California 91801

WEDNESDAY, MARCH 16, 2011
6:00 P.M. - 8:00 P.M.

PAGES 1 - 36

JOB NO. 123167

REPORTED BY: ADONIS A. LEWIS, CSR NO. 12599

ALHAMBRA, CALIFORNIA, WEDNESDAY, MARCH 16, 2011

6:00 P.M. - 8:00 P.M.

MS. McCORMICK: Good evening, everyone. How are you? It's a little after 6:30, so we'd like to get started on our meeting tonight.

My name is Mary McCormick. I am with a company called MBI Media. And we are facilitating our meeting tonight. We are in the third series of a three-part series of meetings.

And tonight is our SR-710 conversation "Going on the record." And I would like to first of all -- before we begin, I'd like to introduce our two translators who are here to assist anyone who may need English translation.

I'd like to introduce Charlie [Gupe] and Joanna [Amador] who will be able to do that in both Mandarin and Spanish.

(Translators introduction - no interpretation was provided for the record.)

MS. McCORMICK: Thank you, Charlie. Thank you, Joanna.

I'm very pleads tonight to recognize in our audience several members of elected officials and other members of the civil community who joined us this evening. And if you'd like to stand, I'd like to acknowledge that you're here.

Chris Paulson who is with the City of Alhambra. And

Enrique Garcia with the City of Alhambra as well. Dan Hutchinson who is the Transportation Commissioner for the City of Alhambra. There you are. Ricky Choi who is the Civil Service Commissioner with the City of Alhambra. Wing Ho who is with the Design and Review Board with the City of Alhambra. Barbara Messina with the City of Alhambra City Council, back there. Gary Frueholz with the Alhambra Planning Commission. Adele Andrade Stadler with the Alhambra School District. Good evening. Maria [Venzuela] is the field rep for Assemblymember Mike Eng. Thank you for joining us. And Maria Murray with the Planning Commission with the City of Alhambra. Thank you for joining us. Well, we'd like to really extend our thank you for participating in this process. It's a very important process.

I hope all of you got the two handouts this evening. We have two. We have the SR-710 conversation and information packet. It has a tremendous amount of information for you. And most importantly, it has the dates, times and locations for the scoping series. It also has a calendar in it for you as well. And it also has several other pieces of information, including two other pieces of information that are very important, one which is the comment card.

You'll see around the room boxes for comment cards and exist surveys. Those are very important to make sure that you fill them out so we can make sure that we receive your

comments in writing. But also we want to make sure that you take a look at your exist surveys, and if we can do everything to do the meet better, that would be very helpful.

As I mentioned earlier, we are in series three, but you should have received a packet of information for CEQA NEPA. That is the California Environmental Quality Act which is the California rules. And the NEPA is the National Environmental Policy Act which is the Federal Environmental Guidelines. So that study guide will help you understand both the State and Federal environmental process flow charts on what we are studying prior.

We have environmental managers from Metro here to answer questions about the last six meetings we just had. We have around the room as you've probably already seen several different stations.

I would like to make a note. You may or may not know this, but evening during this meeting if you would like to go back, you can go in the back room where the public comment and scoping station is. That actually is where we will enter your comments and type for you written-typed comments if you don't want to write them out. And then, actually in station six, we have our social media. And I wanted to show you a little bit about that. But before we go into that, I want to talk about a virtual meeting.

On Monday, March 21st, we will actually be going

live. It will be one of the very first live web meetings that Metro has put on. And you can sign on to join that meeting anytime between March 21st and April 14th to view the materials.

The really interesting thing about this is those people who are house bound or can't get out to a meeting like this, or somehow it makes it easier for them, it's like a three week meeting. It's a fabulous meeting. And people, please encourage your friends, family, neighbors, anybody who can't get to a meeting like this. Please, it actually makes it easier for them to have access and get their voices on record.

And they will be able to actually see all the materials, all the collateral materials, that you see here tonight, all the boards that will be in that virtual meeting. And once that closes on March 21st, it continues. It's 24/7, and it ends on April 14th. So you have a three-week window, 24/7, to make your comments heard. You can also go to visit: Metro.net/sr710conversation. That's on their website. So this is pretty cool.

This is an example of what the virtual meeting is really actually going to look like. It's a beautiful 3-D. It really pulls you into an actual meeting look. This is the presentation room. You can click on a lot of different buttons to get information. You'll actually have someone live

who will be audibly responding. And you'll hear on the internet the voices of the people who are typing in their comments.

These are the stations. As you see around the room, we have different stations. Our stations here are a little bit more interactive. As you can see here in station 5, we have the very first overview video that MBI did. And we're hoping to make this available for you when you get into this meeting. But this gives you an example that you can actually click on and go into some of these stations as well.

We have information so when you get into here, you can either chat live on line with someone who will be there live to answer any of your questions. And you can actually go into a booth chat, so you have multiple people chatting all at the same time. So it's really kind of a high-tech pretty amazing way for us to reach out virtually with one another to talk about this. It's really fabulous for people who can't get out of their home.

So tonight, I'd like to talk about our first scoping meeting. This is where your voice really goes on the record. Please be really cognizant of that, that we're really looking for your comments. They are entered into the Environmental Impact Report. And Environmental Impact states the process. And this is where I turn it over to Garrett Damrath. Garrett is with Caltrans, and he's going to be providing an overview

of the whole scoping process. Garrett.

Oh, I'd like to acknowledge John Lodge who is with the Planning Commission of Alhambra. Hi, John. And let's see, Owen Guenthard who is the Executive Director of the Alhambra Chamber. Welcome. Glad to have you.

MR. DAMRATH: Good evening. And thank you for taking the time to participate in this important scoping process. I'm here on behalf of Caltrans and the Federal Highway Administration. In 1978 the Council on environmental quality defined scoping as an early and open process for identifying important issues related to the environmental process as voted in action. And that was in 1978. The law changed since then.

When it was originally conceived, it was an agency-oriented process to ensure collaboration and minimize any conflicting activity. Over the years, it has changed into a more public process, and agency meetings are more of a courtesy at this point.

The scoping process is flexible and unique to each project. No decisions have been made at this point, and we are here merely to gather information.

So why are we here? Previous studies have indicated that the SR-710 Gap contributes to growing congestion on nearby freeways and arterials, published in the 1998 record of decision. Later, in 2003, that record of decision was rescinded and continued development on the project was

prohibited without further environmental work.

Later, Measure R, approved by two-thirds of L.A. County voters, went to fund -- to address transportation problems throughout the County, including the SR-710 Gap. And then the Metro board adopted motions to move forward with the environmental phase.

What we are doing is scoping for solutions. And it's a new and state-of-the-art scoping process that Metro has been spearheading. We've convened 18 public meetings as part of the scoping process. We're trying to provide engaging and instructional dialogue and maintain an open and transparent process. We have solicited broad participation input, and we facilitate continue SR-710 conversation through the social electronic media platform that Mary mentioned.

So the purpose of scoping is to identify issues to be addressed in the environmental documents. The lead agencies for these documents under CEQA NEPA is Caltrans. Under NEPA, we've been delegated the authority to use NEPA for purposes of this project -- or all projects in California. And we would like to get those written comments submitted to us by April 14th. So your role in scoping is early in the process, the EIR/EIS process. So before we actually start the technical studies on the project, we want input from public and federal and state local agencies. And what we would like to do is identify potential alternative, issues and impacts to be

analyzed, and the level of details in these analyses.

How you do that is by providing oral testimony as you will today and/or written comments. And there are many ways to put written comments down through the social media outlet. And we urge everyone to stay in involved.

So here is our project study area. It's a very vast project study area. Here is a short list. Actually, it's kind of a long list of the preliminary project. And I will read through this kind of quickly.

We want to improve regional mobility and accessibility for movement of people, goods and services. Reduce circuitous out-of-direction travel on the network. Reduce congestion on north/south arterials and local streets currently adversely affected by diversion of freeway trips. Improve regional travel time savings and thereby reduce loss of productivity associated with congestion. Provide additional connectivity in the regional network and for use by public transit. Improve regional and local air, mobile source air quality characteristics. Reduce greenhouse gas emissions from local sources. Provide a project that constrains impact in local communities to acceptable levels. And develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including private-public partnerships.

At this point our project alternatives are route

neutral surface and/or subsurface freeway or highway; heavy passenger and freight rail improvements; bus and light rail system improvements, including the first and last mile; local street upgrades, including signal synchronization; and pedestrian and bike access improvement; and traffic management systems; and the no-build.

Some of the new factors to be considered in this project are multi-modal transportation landscape, emerging environmental issues and advances in technologies, potential funding and revenue sources, and project delivery and procurement methods.

Our project milestones are public outreach and the issuance of N.O.I. and N.O.P. in public scoping meetings, which is where we are now. We would move on to complete a draft of the EIR/EIS, hold public hearings on that draft, then prepare a final EIR/EIS. After that is done, we would make a Record of Decision and Notice of Determination under NEPA and CEQA.

The environmental document type for this project is going to be an Environmental Impact Report for CEQA and an Environmental Impact Statement under NEPA. The project contact, if you have written comments, this information is widely available. We would like all the comments to come to Ron Kosinski, the Deputy Director of Caltrans, District 7. And his address is, like I said, widely available.

And I would like to Thank you very much for coming in this evening. I know it takes a lot for everyone to take time out of their day to participate in this process. And we appreciate that. So, thank you.

MS. McCORMICK: So as we move into this part of our evening this evening, we're actually going to be offering up the opportunity for oral comments. And I wanted to let you know, if you haven't done so already, please fill out a speaker card, and we'll make sure that it gets up here. And you don't have to do it this very second. If you want to do it a little later, that's fine.

Some protocol and rules for the meeting. I'll be calling up two people at a time. They'll be coming up to the microphone. And then we'll have one person speaking and one person on deck. So kind of like baseball. We have a timer light right here for you. Everybody gets two minutes. The green means that we've started. Just to let you know, when you're up here, when your yellow light comes up, you have 20 seconds left. And when the red light comes up, you have about 10 seconds left.

Just to remind you, we aren't able to actually put the -- we aren't able to answer questions tonight. But we do want you to make sure that you submit any of questions in writing. So make sure that we get all of that tonight, so that it can go into the record.

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And we do have a court reporter tonight. Our court reporter is right here. She is legally recording everything we say this evening. So everything is going on the record. And, of course, that's our title. And if I may ask you please, to speak clearly and slowly for her.

When you come up, if you are going to speak, we would like for you to give us your full name as well as your address. It's really important to have your address, so that you can go on the record. Your address is part of the legal record. And we will conclude our public speaking. But we want to make sure that everybody has an opportunity to speak. So I'd like to go ahead and get started with that.

Our first speaker this evening will be Gayle McKinney. And the second person behind her will be Leland Dolley.

MS. McKINNEY: I'm going to use my notes, because I get stage fright and forget what I'm saying. But Alhambra has borne the costs of an awful lot of people getting onto the freeway. And instead of it being a state project and registered over the State, the costs is being carried by the taxpayers in the City of Alhambra. And that I feel is very unfair for people who are not -- are just going where they're going. So I think that that's something that people haven't been thinking about, the costs. And then they talk about the costs of building the freeway. The cost of this, the cost of

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that. But the costs to the Alhambra residence is very high. And the other costs is to the drivers. If a driver is doing 45 miles an hour or so, he's spending less money, less of his nerves, and that's going to affect his blood pressure and his medical. We're not counting all those costs, and those costs are all in there. So I want to see this project go forward in an rapid method. Can't go too soon for me. And I don't care whether it's overground or underground or on Robin Hood's yard. Just so the north traffic can go on a state run project. Thank you.

MS. McCORMICK: Thank you, Gayle.

Mr. Dolley.

MR. DOLLEY: I will echo and ditto. My name is Lee Dolley. I'm the former City Attorney of the City of Alhambra some years ago. 111 South First Street, Alhambra, California.

We want to make the comment first, that we expect and hope and we know that this will be the best, most thorough environmental impact work ever done in the State of California. We want everybody to be heard. We want everything on the line, and do it right. I'm sure that comment could be picked up by the people that understand what I'm saying. We do wish to make only one comment for the record.

There has been discussion at several meetings beforehand that it costs some $11 billion for this project.

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If the people making that accusation or that comment will simply look at the SCAG documents, you will find very, very quickly that the amount is much less than that, $4.6 billion. This is an estimate as made by SCAG by law. It is the organization that makes those kinds of estimates.

Instead of throwing out that anymore further, I just want to put on the record that we would ask that that be looked at by the folks that are doing the environmental impact documents. And we would like to ask the people that are doing the erroneous information of $11 billion to check the SCAG documents. Thanks very much.

MR. PAULSON: Chris Paulson, 521 Alhambra Street, Alhambra, California. Speaking tonight on private residence. I am first and foremost in favor of completion of the 710 Freeway. It's been going on way too long, this legal battle. The residence of Alhambra deserve better. We deserve completion of freeway for a number of reasons, some of which have already been touched on tonight.

First of all, there is traffic. We are dealing with lots of traffic being dumped into our streets unfairly. I think that the traffic dispersed needs to be shared by all the communities in the area, not just Alhambra alone. That traffic leads to emissions. It leads to greenhouse gases, which is allegedly causing climate changes, most scientists will say.

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Traffic also causes frustration. It causes health side effects. It raises stress. The emission causes smog, causes pollution. Our residence have been inhaling that smog for 50 plus years. That includes school students, such as myself born and raised. I would hate to come down with asthma one day as a result of the 710 Freeway.

Also I believe it's an economic impact that Alhambra's been suffering. As a result of all the traffic and the damage to our roads, people don't want to come to Alhambra. If you alleviate the burden of the traffic facing Alhambra, I think you'll have more people coming to this, not just to commute, but for recreation, for entertainment, for restaurants, for whatever.

Also, I believe there is a bit of a social injustice involved. I think Alhambra has been treated as the poor little stepchild in the area. And has been bullied by the City of South Pasadena. I think that it's time that we evenly share the burden of this region for traffic and all the negative conditions faced by traffic. And I support the 710 completion.

MS. McCORMICK: Thank you very much.

I'd like to call up Adele Andrade Sadler and Mr. Frank Bodeman who will be next.

MS. STADLER: Hi. My name is actually Adele Andrade Stadler. And I'm at 2956 West Shorb Street here in the City

of Alhambra. I'm the current president of Alhambra Unified School District. But I'm a mom first and a resident first, although I have many children to be responsible for.

One question is, "What environmental concerns impact you the most?" Well, each and every morning I start my day like many of you, except that I don't see too many of my neighbors here. But I'm at 2956, which is one street north of Valley Boulevard. Just east of me is Fremont. Just west of me is Westminster. We're highly impacted by the 710 not being completed.

I see everyday moms and dads walking their children to school because of the impact of the economy. They have only one car, so they're walking their students to the nearby school. And they're there, and they're walking between 6:30. And at 6:30 in the morning, the cars are idling already and they continue to idle until about 9:30 a.m.. And then they come back again at about 2:00 and idle until about 7:00. So you can imagine back and forth the students breathing this air aside from our own families breathing it.

Many people here know the black soot that sits on our window seals. I wonder if that soot sits in other people's lungs. We have seen in the school district the impact of absences because of asthma. I wonder what that's related to. Please look at completing the tunnel, the 710. Please take the cars off our streets, off our neighborhoods. And let's

hope that this will actually come to past. Thank you.

MS. McCORMICK: Thank you.

After Frank Bodeman, Owen Guenthard.

MR. BODEMAN: Hi. My name is Frank Bodeman. I live at 114 South Electric Avenue, Alhambra. I've lived here for 48 years, and I've seen the traffic tremendously pick up in this area. My son goes to Northrup, where it used to take me 2 to 3 minutes to take him from Electric to Atlantic. Now it takes me almost half an hour just on Commonwealth and Electric, because the cars are coming in.

The traffic on the Atlantic Boulevard is so bad that the traffic on Commonwealth, I have to park between Marguerita and Curtis and walk my son to school at times. It's so bad, just to get him there on time.

There's times where I have to go on Main Street and come down Atlantic. And then the traffic at the school, between Commonwealth and Mission is so bad, God forbid if a light ever goes out, which it did, it took me 40 minutes just to travel one block. 40 minutes. And that's ridiculous. So I'm supporting the 710, and I would like to see it finished. That's all I have to say.

MS. McCORMICK: Thank you very much. After Owen is Barbara Messina.

MR. GUENTHARD: My name is Owen Guenthard. I'm a 70 year resident of Alhambra. I am also the Executive Director

of the Alhambra Chamber of Commence. My home is at 1211 South Third Street. I'm here in support of the completion of the extension of the 710 Freeway.

I just think that the cities that are going to be impacted by the extension of this freeway should start thinking that they are part of a regional problem. And they are not only citizens of South Pasadena and La Canada, but they are citizens of the greater region. And this is what we are approaching as a regional problem.

I can recall in the '50s when the City of Alhambra was impacted by the creation of the 10 Freeway. That split our city in half. We could have sat and rung our hands and said, "My God, what's happening to us, all these negative things." But it is helping bring economic positive impact to our community. It has granted us with greater access to our regions.

I think that is how problems like this should be approached. You should think that you are a citizen of the entire region, and you have to step up to the plate and support solving this regional problem. I won't go over the negative impact of the health and inconveniences that have already been stated very eloquently by the people that have preceded me. But I speak on behalf of not only the citizens of Alhambra, but also the businesses of Alhambra, that they're in 100 percent support of the completion of the Alhambra

freeway.

MS. McCORMICK: Thank you.

So after Ms. Messina, we would like to call up Hank Fung.

MS. MESSINA: Thank you all for coming. This is a great group. I have been an elected official with the City of Alhambra and the school district for 24 years. I have been on this 710 completion for 28 years of my life personally, when it first started when it was a surface route.

When that freeway was built, it was never intend to end on Valley Boulevard in Alhambra, because it's a state highway. It was meant to connect to the northern part where it stubs out in Pasadena.

People have said that Alhambra has created the problem by all the development. These are people passing through our community to get to work in the morning and to get home in the afternoon. It's all pass-through traffic.

When I was on the school board, the impact on our school kids -- we have several schools whose playgrounds are on arterial streets: Fremont, Atlantic, Electric, Garfield. These kids are products of what those cars, as was stated earlier, idling. It was never intended for our local streets to have all these cars. The impact on our streets is incredible. The damage to our streets is enormous.

I cannot tell you how important it is, regionally as

it was said, to finish this gap. It is a gap. It is not building a new freeway. It is completing a freeway that makes all of the other freeways interchangeable. As a result, you have congestion and backup starting from the downtown interchange, because there is not through interchange on the different freeways. Thank you.

MS. McCORMICK: After Hank, Stephen Trapani.

MR. FUNG: Hi. My name is Hank Fung. I have a slightly contrary viewpoint to that. I don't believe that it is the gap closure. We should use a mutual term such as freeway construction or project or something like that, rather than gap closure.

In terms of the process, I think that we need to confirm that e-mail and phone comments to the 710 hotline are accepted on the record. You put the binders in those Phase 1 and Phase two meetings as part of the record as well. Publish all transcripts, comment cards, et cetera, online.

Remind people that the written comments made before February 28th need to be made again, and that the attendance sheet should also be online and not be located in a library or somewhere. It needs to all be online.

In terms of the project, I think there are several options we need to consider, such as the option to connect to State Route 2 rather than State Route 210 in Pasadena. That's an option that I think needs to be studied. That would enable

connections to a future Palmdale, Glendale tunnel.

An option that should be studied is reducing the diameter of the tunnel to perhaps a 12-foot clearance. This would eliminate the ability for trucks to use the tunnel. And trucks, of course, distribute a lot of particulate matter. Trucks are band in South Pasadena and on Fremont Avenue, so it wouldn't necessarily be any change to remove trucks from the tunnel. But using the clearance of the tunnel could band trucks. We [congestiontize] the tunnel with no maximum price. By doing so, we could have funding for the tunnel.

One of the issues is also to consider making it an HOV only tunnel, such as on the Shirley Highway in Washington D.C. where it's two-ways in each direction. You might be able to get away with just one tunnel, but two lanes in each direction. And that might be able to save some money for the project.

Also, in the scoping process, we need to have a solid, accurate, PBM, TSM, alternative that reflects current, transit condition such as the elimination of Line 45 on weekends and nights, and the possible elimination of the Rapid Bus 762 on Atlantic Boulevard. Thank you.

MS. McCORMICK: After Mr. Trapani, Mr. John Lodge.

MR. TRAPANI: My name is Stephen Trapani. 508 South Chapel Avenue in Alhambra, California. I'd also would like to have let 710 tunnel completed. I think it would satisfy the

residence of Alhambra, also South Pasadena, an adjoining city. I don't understand why La Canada Flintridge is putting up a fight, when they already have a freeway there. And I think the people going to La Canada Flintridge would be going there anyway. I also have a few of the projects that I would like to see Alhambra complete along with having more buses, using the ACT service bus.

From my understanding, the 45 is about to be eliminated along Fremont that goes to the bus route through Cal State L.A. to downtown L.A. I believe the ACT should pick up that service, maybe possibly starting here at the Mervyn's parking lot, going through Mission Road, servicing Valley Boulevard and getting onto the 710 south and so on.

Also, just simple solutions like having left turn lights in the City at every intersection along Mission Road and Valley would help out with congestion in Alhambra. I would like to see Metrolink use the Mission Road track here. I know it's a freight line, but I think there could be a few services of Metrolink here to service the people of Alhambra and Rosemead and east El Monte. Just a few trains in the morning, a few trains in the evening. And you could put station in the Park. There's plenty of parking there. So those are a few solutions that would help out the region and especially Alhambra. Thank you for your time.

MS. McCORMICK: Thank you very much.

Next up would be Sam Burgess. Wait, go ahead, John.

MR. LODGE: Good evening. I'm John Lodge. I'm one of the planning commissioners of the Alhambra Planning Commission. I've been an Alhambra resident for the past 18 years, and I'm also a parent. And I have children that go to school here. I am also an architect. And I personally am very much in support of the completion of the 710 as going through Alhambra, as there is a tremendous traffic problem.

Also, I really value the beauty of South Pasadena. And I believe with this new tunneling, it can be done with non-impact to those beautiful neighborhoods of South Pasadena. Thank you.

MS. McCORMICK: Thank you very much.

Teresa Lucky is next.

MR. BURGESS: My name is Sam Burgess. 626 Prospect Avenue, Number B, South Pasadena. I'd like to thank Caltrans and Metro staff for all of these meetings. I'm sure that by the time this is over with, they're all going to go out and have a couple of beers. It's been a very long month for them.

Studies have shown that diesel emissions from trains are less than that from trucks per 10 miles. A study must be done to demonstrate the difference of air pollution from 10,000 trucks per day versus 3,000,000 trains per day. Also, the emissions of any trucks should be mitigated to below those of trains. That is my statement.

I would like to comment on the gentleman who spoke about the costs of this project. The figure he gave, the low-ball figure he gave is accurate, except for the fact that if you do read the document that he's talking about, the Parsons Brinckerhoff document, you will see it very clearly states for the costs of drilling the holes only. That is not the total cost of everything.

Later on in the document, there's a laundry list of items that must be done that brings that price up to over $10 billion. People from Long Beach, La Crescenta, Glendale, Sierra Madre have studied these documents. Many think that $11 billion, the low-ball figure, is probably closer to $14 million. So once again that $4 billion that was quoted was for the cost of drilling those holes, and that's it. It thank you.

MS. McCORMICK: Thank you. After Teresa is David.

MS. LUCKY: My, I'm Teresa Lucky. I'm a residence of Alhambra for 34 years. I have a question. This is for the many officials of Alhambra here. I was told that Alhambra has spent over $1 million on control [census] for the 710 Freeway. Can anyone give me an answer? Alhambra City Council, Barbara Messina. No one has the answer. Okay. That's all I have to say.

MS. McCORMICK: Thank you. David Czamanske and Janet Ervin is next.

MR. CZAMANSKE: My name is David Czamanske. My address is on this computer card here. I'm an environmental consultant, and I've reviewed a lot of environmental documents. And it would take me more than 22 minutes to talk about all the things that need to be addressed in this scoping process. I'd like to take a different a little bit different track and talk about some of the different illusions that need to be knocked down about this project.

First of all, there's an illusion that this project will reduce traffic congestion. The likely reality is that if a freeway link is built, it will initially attract additional vehicles through this corridor to the extent that it will create large scale traffic congestion and reduced speeds the day it opens. The results will be that drivers will seek alternative routes, i.e., surface streets to avoid this congestion, just as they now do to avoid congestion on the freeways, including the 10 and 210 throughout Southern California.

The second illusion is that public funds may be available in the near or long-term future to build a freeway extensions like this. The likely reality is that neither federal nor state government will have significant funds or be willing to commit significant funds for this project due to the severe budgetary constraints the nation and the state are experiencing, and will continue to experience into the

foreseeable future.

The Obama Administration desires to commit sizeable funds for high-speed rail. Whether it will be able to do so, given the current Congress is uncertain. But this project is likely to be very low on any federal transportation priority list.

Third, there's an illusion that private enterprise will come to the rescue to play a major role in funding this project. The likely reality is that such funding will not happen. Private enterprise needs profits to participate. And this project is unlikely to be profitable for the basic reasons cited in point number one.

The significant toll, $5 to $25 or whatever it is that you want to call it, will be required to generate a profit. However, drivers pay a toll only to save time and congestion. They will not pay a toll to sit in congested traffic, especially if they are in a tunnel. Drivers of passenger vehicles will be strongly motivated to avoid the toll, and congestion will therefore seek relief by traveling on surface streets. Drivers of corporate-owned trucks may be willing to pay a toll no matter what it is, since they are not allowed on surface streets. But to hope that commuters will pay significant tolls to drive in such a toll lane is just that --

MS. McCORMICK: Dave, could you end up, please.

MR. CZAMANSKE: Okay.

MS. McCORMICK: Thank you.

Janet Ervin, and then Joanne Nuckols.

MS. ERVIN: Good evening, everyone. My name is Janet Ervin. I live at 801 Meridian in South Pasadena. And I'm a former residence of Alhambra. I lived here in the 1980s. I loved living here. It was a beautiful community then.

What I see now, is those houses that used to be across the street from where I lived, now has six condominiums on each one. There's been tremendous redevelopment. There's nine community developments here in Alhambra. And I understand the interest of bringing more business and so forth, but it really has caused a lot of congestion.

I think that one of the impressions that people here have is that South Pasadena has different interests from Alhambra. I really don't see it that way. I think we all want regional solutions to the traffic problems. And we want to protect the health of people throughout the corridor. I feel that building a tunnel with 100-foot-high smoke stacks of unfiltered exhaust will severely impact the entire region. One of these 100-foot towers, the exhaust from the tunnel will be right next to the Huntington Hospital in Pasadena, which is a hospital that serves the entire region.

We also have to look at if there is a tunnel, the amount of pollution that will be at the corridor. There will

be one here and one at the other end to the north.

One of the things that's happening now is the lower 710 is being expanded. And that will only cause more traffic to come up here. And if you have a tunnel, it will be narrow. It will be a huge bottleneck here at the entrance, and cars will be backed up. And I think you will have more traffic than we had before.

I think what we need to do is look at other solutions. And there are other solutions to both the commuter traffic and the forced freight traffic. The traffic at the force freight needs to be put on heavy rail and taken to distribution centers, and keep those trucks off of the 710. And all of us need light rail more like the Goldline to make connectivity, so people don't have to drive. They will have choices. Thank you.

MS. McCORMICK: Thank you. John Nuckols, and then Martha Vanegas.

MS. NUCKOLS: Joanne Nuckols. 1531 Ramona Avenue, South Pasadena. And I live approximately a block from where the proposed surface routes would be. And I'd like to make a statement that when Caltrans and Metro are studying the tunnel in the alternative now, that they should honor the truck band that was reached in 1993 by Caltrans. There should not be trucks allowed on that part of that study.

Also I'd like to talk about in all the years of all

the studies that's been done, there's only been one scientific origin destination study done in the 710 corridor. It was done in the 90s as part of a study of in Pasadena. The study showed that only 25 percent of the traffic went from stub to stub from the Alhambra, Los Angeles border to Pasadena. Currently that's only about 10- to 12,000 cars.

Then you go to the Metro PCP study that's about to come out. They say that there would be about 190,000 trips in the tunnel. That's four times the amount of traffic now that comes out of the stub on Valley Boulevard. Meaning, you would have the same amount of traffic from the cars that will not go through the tunnel, whether it's a toll tunnel or it's free. There's a 15 percent diversion rate, 15 percent of 190,000. You do the math.

As the toll goes up in the chart in the Parsons Brinckerhoff study, there are less and less people using the tunnel. They would go on the surface street. The 120 figure of SCAG the billion dollars, was done in September of 2007, and mysteriously was cut in half to $5 billion. One has to wonder what you have to do for such large numbers. South Pasadena has stepped up to the plate already in 1939, and we paid the price for a freeway, the first freeway. And we've had it for 72 years, the Pasadena freeway. Thank you.

MS. McCORMICK: Martha Vanegas and Maria Murray.

MS. VANEGAS: I live at 2705 Ramona Avenue in

Alhambra. And the reason I'm here is because it's worrying me because my son, he goes to Fremont School. And all the traffic and all the congestion, I'm afraid of that. I think it will help all of the traffic and all the smoke that my son smells when he's playing in the background. Thank you.

MS. McCORMICK: Maria Murray and then Dan Bednarski.

MS. MURRAY: I'm Maria Murray. I reside at 1708 Stoneman in Alhambra. I'm a Planning Commissioner, but I'm here as a resident. I've lived in Alhambra for 35 years. I've raised my children here. Now I'm focusing on my grandchildren. During this time I have seen three surface streets, Fremont, Atlantic, and Garfield become Alhambra's freeways.

The automobiles in the morning, rush hours, the afternoon rush hour, and the weekend rush hour of commuters going through Alhambra to go to whatever destination they're going to is not safe. We have children in our local school. They breathe the pollution, not just automobiles, but from trucks going through the are, large trucks. Not just a few, but a lot of them.

We have the 10 Freeway. We have the Mission Railroads. We have the 10 Amtrak rail. We have potentially the speed trains use computer to go through Alhambra. We have all these contributors. And people in our neighborhoods don't realize how much impact this has on us and our children.

There's a lot of opposition to the freeway. But there's really -- there have been no reasonable recommendations for what to do if this doesn't go through. So the 710 Freeway is long, long, overdue for completion. I strongly support it. And I hope that the State will complete it, if not for me, for the children. Our children deserve everything else that children from our neighboring communities are enjoying. That is an environmentally, healthy area safe for them to play in. Thank you.

MS. McCORMICK: Thank you. Dan and then Frank Pulciano.

MR. BEDNARSKI: I'm Dan Bednarski. I live at 1829 South Olive Avenue, Apartment A, Alhambra. I do not support a surface route for the 710. But I do support at least studying on the tunnel route, though there are a few qualifications.

I also agree that there should be no trucks or hazardous materials in the tunnel. Caltrans needs to filter any tunnel exhaust. A tunnel will be around for generations. It needs to be made scalable. Although today we're talking about autos at $5 a gallon for gasoline or more, we're going to be talking about more mass transit in the future. So it needs to be studied to provide trains and light rail in the future. As other mass transit is added and as train routes are created, light rail routes are created, that the tunnel could possibly be used for that as well.

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I also ask Caltrans and Metro to put all related documents online. So the supporting studies that have been talked about, key studies listed on the board here, price estimate documents that everybody's been throwing around, most of us have never read them. If we could have access to them, that would be very helpful.

MS. McCORMICK: Thank you very much. Frank and then the next gentleman is Al Diaz.

MR. PULCIANO: My name is Frank Pulciano. I live at 605 North Granada. I've lived in Alhambra for 59 years. I come over here in '59. We've lost too much time here. Talk and talk and talk. I forget how much time we talk about. We want to go through, just do it. We here from all the people. Hundreds people each day go through Valley Boulevard and put their car over there each time. The people give 710 Freeway have to agree with Alhambra. What good place to live, Alhambra. Good eats. Good barber. Let's let this go through. Pretty soon I'm gonna die and never see it go through. And say next year, and next year, and next year. So the train raise a lot of traffic in Alhambra. I want see this wish go through. I hope you guys push very hard. I pay very much. Thank you very much. I hope it go through before I'm gonna die. God Bless you.

MS. McCORMICK: I'd like to ask Al Diaz to come up. And then right behind him Annette Arizmendez.

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MR. DIAZ: Hello, I'm Al Diaz. I live at 240 Hampton Terrace. And like other people have been saying, I was going to say the same thing. But we've been having meetings for years and years. Look how many freeways have been built around Los Angeles. And all we need is four and a half miles that we can't even build.

And, you know, they're talking about tunnels. South Pasadena is talking about pollution and noise. What do you think is going on when traffic is stop and go and stop and go? Where do you think the pollution is going? You know, they don't make cars like 20 years ago. The cars now, they're not noisy, and they're not supposed to pollute.

So if you don't want to make tunnels, if you go to Louisiana, there's bridges on top of water. Maybe you should go that route. But let me tell you, the way things are going, four and a half miles, I don't think it's ever going to be built because there is somebody putting on excuses and excuses. All I can say is we already have the route to South Pasadena. Why don't you build it to Huntington Drive and just forget about it. Let south Pasadena worry about all the pollution and cars and all that. That's easy. You don't have to worry about meetings. It's not going to be built. Never. If it's taken 30 or 40 years, I don't think it's ever going to be built.

MS. McCORMICK: Our last speaker is Enrique Garcia.

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But if there is anyone else who would like to speak, please fill out a card.

MS. ARIZMENDEZ: My name is Annette Arizmendez. I've lived in Alhambra for 25 years. And I'm one of those cars that Adele was talking about on Valley Boulevard idling. For 20 of those 25 years, I've commuted to LAX to work. And during that time I was able to watch the Century freeway being built. As a matter of fact, I used to joke with people that I've worked there for so long, they've actually built me my own freeway.

And that's why I've always wondered why, in Alhambra where I've lived for 25 years and heard all the pros and cons that this project, as the gentleman spoke before me, has been stalled for this long. And yet, I'm not sure what went into building the Century freeway, but I watched it. I watched them install the safety tunnels and all of that during the short period of time that I was driving to work, which took quite a while. But it was tremendous. To be able to see the century freeway and the Metrolink going all the way down to Redondo Beach, although it didn't go to LAX. But it did make well past there with the connections. But it's always amazed me how this issue could be stalled for this long and yet you can watch a whole freeway go up. And as the other gentleman said, other freeways being built also. Thank you.

MS. McCORMICK: Thank you.

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MR. GARCIA: My name is Enrique Garcia. I live at 329 East Adams Avenue. I'm one of the planning commissioners in Alhambra City. I'm also one of the families that's in favor of the 710. And I've lived in Alhambra for 18 years. And I've worked in Pasadena for about 4 years out of those 18 years. I worked in downtown L.A. and Rosemead and San Gabriel and all over the place. I can tell you that it makes no sense to me why we haven't finished out the gap of the freeway. I think everybody in their right mind will see the Thomas Guide Map and see all these other unfinished freeways that were meant to connect to other freeways. So I'm here to express my support for the continuation of the tunnel.

MS. McCORMICK: Thank you very much.

And we have an additional person, Gary Frueholz.

MR. FRUEHOLZ: My name is Gary Frueholz. I'm a member of the Alhambra Planning Commission. And there's been a lot of good points brought up tonight about the extension of the 710. I'm in favor of it. A lot of good points have been made. I wanted to bring up two additional points that I thought were rather interesting.

One is that we just finished with the 2010 Census. The 2000 Census for the City of Alhambra had us with a population of 85,000 people. With the year 2010, our population has gone down to 83,000. So there's sometimes an argument given against this extension that, well, Alhambra is

getting so much bigger and they're putting in condominiums right and left. The population of Alhambra has come down. So I'm resistant to that argument that Alhambra is getting a denser population, because we're not.

Also, the argument about the railroad trench with the number of bridges. Sometimes you'll here the argument that Alhambra restricted the number of bridges. There was only one less street that was taken out when the trench was put in. So I don't think the trench is created a lot more traffic congestion. The existing streets still are going over the trench. I just wanted to point that out. Thank you.

MS. McCORMICK: So is there anyone else? So what I'd like to do is I'd like to kind of remind you of the ways that you can comment. Remember, you can submit your written comments this evening. You can take the written comment cards that you have in your packet home. You can take that and mail it to Ron Kosinski. The address is on there. You can actually type -- and assist you in typing your comments in the back on a computer that's provided.

And as you know, anyone who spoke this evening, all of their oral comments were recorded by the court reporter. You have your virtual online meeting on the 21st of May. You can actually go on record and go online, and your comments will be recorded on line. And also, if you would like to -- we can actually register you tonight. I think we can make

sure that you get information. At the corner here under "Social Media" we can sign you in so all you have to do is go on line -- Yes.

UNIDENTIFIED: 21st of March is the date.

MS. McCORMICK: What'd I say?

UNIDENTIFIED: May.

MS. McCORMICK: Yes, it's March 21st. But remember, it's pretty exciting, because it's actually a three week meeting. It goes 24/7 until April 14th. And I want to thank you all for coming. And we will be open here until 8:00 o'clock this evening.

(off the record at 7:35 P.M.)

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, ADONIS A. LEWIS, CSR No. 12599, Certified Shorthand Reporter for the State of California, do hereby certify:

That the aforesaid proceedings were taken before me at the time and place therein stated, that I took in stenotype a true and correct report of the testimony given and proceedings had in the above-entitled case, that the foregoing is a true and accurate transcription of my stenotype notes taken, and is the whole thereof.

I further certify that I am not of counsel or attorney, nor related to any of the parties, and I am not interested in the events of this case.

Dated: Pasadena, California, March 25, 2011.

Adonis A. Lewis, CSR No. 12599

SR-710 Conversations – A Series of Information Meetings

Wednesday, March 16, 2011

NAME: Stephen Trapani

ADDRESS: 508 S. Chapel Ave. CITY: Alhambra ZIP: 91801-4250

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

I enjoyed the meeting in Alhambra on March 16, 2011. I hope the powers to be will have more meetings to discuss solutions on traffic in Alhambra and the West San Gabriel Valley. I hope from these meetings solutions will be heard and implemented.

Sincerely, Stephen Trapani

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

Wednesday, March 16, 2011

NAME: SAM BURGESS

ADDRESS: 626 PROSPECT AVE. #B CITY: SOUTH PASADENA ZIP: 91030

REPRESENTING: NO 710 ACTION COMMITTEE

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

STUDIES HAVE SHOWN THAT DIESEL EMISSIONS FROM TRAINS ARE LESS THAN FROM TRUCKS PER TON MILE.

A STUDY MUST BE DONE TO DEMOSTRATE THE DIFFERENCE OF AIR POLLUTION FROM 10,000 TRUCKS PER DAY VERSUS 3 UNIT TRAINS PER DAY.

ALSO, THE EMISSIONS OF ANY TRUCKS SHOULD BE MITIGATED TO BELOW THOSE OF TRAINS.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

Wednesday, March 16, 2011

NAME: Hank Fung

ADDRESS: 4002 N Lang CITY: Covina ZIP: 91722

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Process

- Use a neutral name for the project - I-710 Extension or I-710 Pasadena - Alhambra Freeway Project
- Publish all transcripts, comment cards, etc. online. All technical appendices should be published online and not only available at libraries or by appointment.
- Confirm that e-mail and phone comments are on the record. If they are not on the record, those individuals should be named that their comments are recorded.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

Wednesday, March 16, 2011

NAME: Hank Fung

ADDRESS: 4002 N Long CITY: Covina ZIP: 91722

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Project

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

- Need a comprehensive origin/destination survey of vehicles within the corridor - both vehicles (license plate) and transit (TAP Card)
- As part of alternatives analysis, include a) an option to connect to SR-2 at Highland Park from Valley Boulevard, to connect to a future Glendale-Pasadena tunnel and b) scope a legitimate TDM/TSM alternative including surface street alternatives, traffic signal synchronization, banning parking on through streets, and rapid bus service.
- Make sure most accurate ~~traffic~~ transit information is being used. Don't be disingenuous and say it is improving transit - is Metro planning on running transit service down the 710 corridor? For example, elimination of the 485 nights and weekends,

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

— See back —

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

Wednesday, March 16, 2011

NAME: Gloria Valladolid

ADDRESS: PO 3071 CITY: Alhambra ZIP: 91803

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Mitigate transit problems w/ public transportation, not more freeways. Stop Alhambra from converting single family home to multiple family units w/the increase of auto ratio per area.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

Wednesday, March 16, 2011

NAME: Terrazas, Veronica

ADDRESS: 5358 Almont St CITY: L.A. ZIP: 90032

REPRESENTING: Family with Memories.

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Fry Ways are needed, but at what cost. Peoples home will be gone. Cant pass on ouier home to family members. Cant give a part of us to ouier grand children. Its like were kicked off the city we live in and know so well.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

Wednesday, March 16, 2011

NAME: Gayle McKinney

ADDRESS: 333 W Main St #617 CITY: Alhambra ZIP: 91801

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Alhambra has born the cost of road repairs for many years as commuters travel to So Pasadena and Pasadena. Traffic is slow, burning fuel inefficiently and agrivating drivers. Something needs to be done now!!

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

FINANCE AND BUDGET COMMITTEE
MARCH 16, 2011
OPERATIONS COMMITTEE
MARCH 17, 2011

F&B5

MOTION BY DIRECTORS VILLARAIGOSA, KNABE AND ANTONOVICH

Super Low/Zero Emission Bus Program

The Los Angeles County Metropolitan Transportation Authority (MTA) was a pioneer in moving its bus fleet to cleaner alternative fuels and continues to be a national leader, with the largest fleet of compressed natural gas (CNG) buses in the U.S. and a 100% CNG fleet.

This transition from diesel to CNG buses was not made for economic or business reasons.

It was known and it is the case that the transition would cost MTA more than continuing with a diesel fleet through higher vehicle costs and new fueling infrastructure.

Instead, the MTA Board made this transition for public policy reasons, namely to reduce emissions (particulate matter, nitrous oxides, and sulfur oxides) and improve public health.

The MTA Board decided to make an investment in cleaner air for the residents, workers, and visitors of Los Angeles County and the South Coast air basin.

Since MTA started buying CNG buses there has been a growing focus on reducing greenhouse gases (GHG) as well.

Today, emerging technologies offer the hope of super low or zero emissions, including electric, fuel cell, and hybrid buses.

However, buses featuring these technologies have a number of challenges for operating agencies like MTA, including limited in-service experience, relative higher vehicle acquisition costs, and potential additional infrastructure costs.

On the other hand, these newer buses may reduce operating and maintenance costs and lower life cycle costs than our current fleet.

As a matter of public policy, MTA should continue to be on the forefront of deploying lower emission buses, but we should do so in a fiscally and operationally prudent manner.

I THEREFORE MOVE that the MTA Board direct the CEO to develop a recommended strategy and timeline, subject to future review and approval by the MTA Board, for transitioning to super low/zero emission buses.

###

SUMMARY OF MY 4 COMMENTS GIVEN ORALLY ON MARCH 22, 2011

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 22, 2011

NAME: RHONDS STEPHENSON

ADDRESS: 4455 ROCKLAND PL, #10 CITY: LA CANADA ZIP: 91011

REPRESENTING: SELF

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

(1) INCLUDE NO-TOLL OPTION

(2) INSTALL SOUNDWALLS ON THE 210 TO MITIGATE NOISE

(3) ~~ALLOW~~ NO TRUCKS ALLOWED NORTH OF THE I-10

(4) REDUCE TRUCK TRAFFIC BY REQUIRING ALL NON-LOCAL FREIGHT TO LEAVE THE 2 PORTS BY RAIL.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 22, 2011

NAME: Lee Dolley

ADDRESS: 111 S First CITY: Alhambra ZIP: 90801

REPRESENTING: City

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

TESTIMONY for the RECORD
SR 710N Gap Closure Project
Scoping Session #3
March 22, 2011

The recently completed SR710 Tunnel Technical Study, October, 2009, used a "route neutral" approach to study the geotechnical feasibility of 5 "zones"; or potential route areas for a tunnel. In these scoping meetings, we have heard a preference stated for Zone 2, which would connect the Terminus of the 710N to SR Route 2 to close the gap.

The Tunnel Technical Study found all 5 zones to be feasible and did not define a superior or preferred alternative. The findings of the Study as they pertain to each Zone, can, however, be used to define which alternatives are to be studied for a tunnel solution in the Gap Closure EIR/EIS.

We would like to go on record as supporting Zone 2 and Zone 3 tunnel routes for further study in the alternatives analysis section of the EIR/EIS. We further support the deletion of Zones 1,4 and 5 from further consideration at this time.

E-3 – Glendale

SR-710 Conversations
Public Information and Education Meeting

MEDIA SIGN-IN

Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
Bill Kislick	Glendale News-Press	Reporter	212 N. Brand	Glendale	818 637-3238	bill.kislick@latimes.com
NICHOLAS T. CONWAY	San Gabriel Valley COG	Exec. Director	1000 So. Fremont Ave A6 Alhambra Ca.		626-457 1800	sgvcsgvcog.org
~~Susan Gilmore~~	~~Metro~~					

NOT Media Pt of contact & sign-in (transfer info)

SR-710 Conversations
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ELECTED OFFICIALS/REPRESENTATIVES SIGN-IN

Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
NICHOLAS CONWAY	SAN GABRIEL VALLEY COUNCIL OF GOVT	EXEC. DIR.	1000 S. FREMONT Ave. A-6 Alhambra, CA		626-457-1880	SGV
Opalis Suarez	CV Town Council Crescenta Valley	~~PO Box 477~~	PO Box 477 Verdugo City		818-974-3008	odyatlow@aol.com

SR-710 Conversations
Public Information and Education Meeting

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Name Nombre 姓名 Անուն	Organization Organización 機構 Կազմակերպություն	Address Dirección 地址 Հասցե	City/Zip Ciudad/ Código postal 市/郵編 Քաղաք	Phone Teléfono 電話 Հեռախոս	Email Correo Electronico 電子郵件 Էլեկտրական նամակ	Would you like to receive emails about future meetings? (yes/no)	Ցանկանում եք նամակներ ստանալ ապագա հանդիպումներ ի մոտ: (այո / ոչ)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息 (選"yes"或"no")
BOB BLUME	KIMLEY-HORN AND ASSOCIATES	835 WILSHIRE, LA	90017	213-489-1228					
RHOADS STEPHENSON	SELF	4455 ROCKLAND PL, #10 LA CANADA, CA	91011	(818)248-7472	ROADYS@EARTHLINK.NET	YES			
JACKY HAWLEY	SELF	3300 PARK VISTA DR LA CRESCENTA	91214	818 236-2657	JackyHawley@GMail.com	NO			
Yggy Chad	-	100 Wilshire LA							
Liz Nelson	SELF	3436 FOOTHILL BLVD #B604 LA CRESCENTA 91214	91214	818-249 4264	LANELSON@SBCGLOBAL.NET	Yes			
SUSAN BOLAN	CVCA	3528 PROSPECT AVE LA CRES 91214	91214	818-249-6672	sbolan1@aol.com	Yes			
SHERRY STUBBS	CVCA	3200 FAIRESTA ST, #11 LA CRESCENTA 91214	91214	818-957-8263	dansherro pacbell.net	YES			
MIKE LAWLER	SELF	2717 AURORA LACRESCENTA CA 91214	91214	818-957-2968	LAWLERDAD@YAHOO.COM	YES			
SAM BURGESS	NO 710 ACTION COMMITTEE	SOUTH PASADENA			SAMBURGESS@SBCGLOBAL.NET				
DAN FARKAS	CONSULTANT		91106	626 793-8457	danfarkas@charter.net	Y			

SR-710 Conversations
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Name Nombre 姓名 Անուն	Organization Organización 機構 Կազմակերպություն	Address Dirección 地址 Հասցե	City/Zip Ciudad/ Código postal 市/郵編 Քաղաք	Phone Teléfono 電話 Հեռախոս	Email Correo Electronico 電子郵件 Էլեկտրական նամակ	Would you like to receive emails about future meetings? (yes/no)	Ցանկանում եք նամակներ ստանալ ապագա հանդիպումներ ի մոտ: (այո / ոչ)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息 (選"yes"或"no")
GARY PETERSON	PARSONS								
Odalis Suarez	CV TOWN COUNCIL	P.O. BOX 477	Verdugo City	818 974-3008	Odyatlaw@aol.com	X			

SR-710 Conversations
Public Information and Education Meeting

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Name Nombre 姓名 Անուն	Organization Organización 機構 Կազմակերպություն	Address Dirección 地址 Հասցե	City/Zip Ciudad/ Código postal 市/郵編 Քաղաք	Phone Teléfono 電話 Հեռախոս	Email Correo Electronico 電子郵件 Էլեկտրական նամակ	Would you like to receive emails about future meetings? (yes/no)	Ցանկանում եք նամակներ ստանալ ապագա հանդիպումներ ի մոտ: (այո / ոչ)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息 (選“yes”或“no”)
STUART WARREN	HMM			626 695 7170	Stuart.warren@hatchmott.com	✓			

SR-710 Conversations
Public Information and Education Meeting

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Name Nombre 姓名 Անուն	Organization Organización 機構 Կազմակերպություն	Address Dirección 地址 Հասցե	City/Zip Ciudad/ Código postal 市/郵編 Քաղաք	Phone Teléfono 電話 Հեռախոս	Email Correo Electronico 電子郵件 Էլեկտրական նամակ	Would you like to receive emails about future meetings? (yes/no)	Ցանկանում եք նամակներ ստանալ ապագա հանդիպումներ ի մոտ: (այո / ոչ)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息 (選"yes"或"no")
Chudette Moody	PB				moodyc@pbworld.com				
EARL SMYTH									
JOHN JAMLET		3300 PARK VISTA DR LA CRESCENTA	91214						
Pat Fuller	PB				fullerp@pbworld.com				
FRED NELSON		~~LA CRESCENTA 91214~~ 3436 FOOTHILL, #B604	~~91214~~ LA CRESCENTA	818, 249.4264		No			
Sally Balonick			91214						
ANDREA Walter									
Garrett Damrath	GT								
Alan Deane	—	209 W Palmer Ave Apt D Glendale CA	91204	818-257-0548	adeane@earthlink.net	—			
~~Nicholas Conway~~	~~San Gabriel Valley COG~~	~~EXEC. DIR.~~ ~~100 S. Fremont Ave 46 Alhambra, CA~~		~~626-457-1800~~	~~sgvcs@sgvcog.org~~				

SR-710 Conversations
Public Information and Education Meeting

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Name Nombre 姓名 Անուն	Organization Organización 機構 Կազմակերպություն	Address Dirección 地址 Հասցե	City/Zip Ciudad/ Código postal 市/郵編 Քաղաք	Phone Teléfono 電話 Հեռախոս	Email Correo Electronico 電子郵件 Էլեկտրական նամակ	Would you like to receive emails about future meetings? (yes/no)	Ցանկանում եք նամակներ ստանալ ապագա հանդիպումներ ի մոտ: (այո / ոչ)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息 (選"yes"或"no")
CLARICE KNAPP		417 E CENTRO ST	SO. PASADENA	(626) 441-6147	hcknapp@earthlink.net	✓			
HARRY KNAPP		✓	✓	✓	✓	✓			
NAT READ		3030 EDGEWICK RD GLENDALE, CA	91206	626 5780705	Nat@NatRead.com	✓			
ZAVEN KAZAZIAN		3113 KINGRIDGE GLENDALE, CA	91206			NO			
Paul Akopian		3217 Dora Verdugo Glendale, CA 91202	91208	818-957-5693		NO			
John Muggridge.		201 Santa Monica Blvd, Santa Monic CA 90401	90401.						
Stephanie Ostrich		505 S Main St. Ste 100 Orange CA	92867			yes			
Clem Gorson	MTA	1 Gateway Plaza LA, CA 90012	90012	213-922-3034	gousmc@metro.net	yes			
FRANK WADA	LINCOLN HTS NC.	2038 WORKMAN ST LA CA	90031	323 225-1012	FWADA2K2@YAHOO.COM	YES			

CALTRANS / METRO
SR-710 CONVERSATIONS

PUBLIC SCOPING MEETING

TUESDAY, MARCH 22, 2011
GLENDALE COMMUNITY COLLEGE
GLENDALE, CALIFORNIA

Glendale, California, March 22, 2011
-0-

MS. McCORMICK: good evening, everyone. If you could take a seat, that would be wonderful. I am glad to have you join us this evening. So thanks for coming. My name is Mary McCormick. I am the president and CEO of MBI Media. I will be your facilitator this evening, and we're very, very grateful that you're here.

We're here to get some information this evening, but please note at any time you can get up to go to any of the stations that we have. If you have need of any information, please feel free to get up and walk around if you'd like to do that.

We have three translators this evening that we always do at every single one of our meetings to make sure that we are inclusive of all languages, and I would like to introduce Joanna -- Joanna Amador and Charlie Gu and Bo Patatian -- to come up, and we're doing Spanish, Mandarin, and Armenian. Basically if you need their help, come see me.

(Whereupon interpreters addressed the audience, but it was not reported.)

MS. McCORMICK: Thank you very much.

Before we get started, we'd like to thank some

of the folks here who are elected officials that are working with AQMD. I'd like to thank Nicholas Conway, who is executive director here from San Gabriel Valley local government, in the back. Thanks for coming. And Odalis Suarez, CV Town Council, thanks for coming. Cecil Cervantes (phonetic), Valley town council. Thank you for coming this evening.

We have quite a bit of information today. When you came in, you got two packages of information. We have recently -- let me back up a little bit here. Some of you already know this, but for those of you who haven't joined us, we're actually in the third series of our meetings, and we have 12, what they call, prescoping meetings. And those meetings were for information that we gathered from the community, and we actually asked the community to please give us their information about what they felt strongly about their community as a citizen and city -- their city and community area as well as the region.

We talked about three specific areas. Their common -- the commonalities, the concern which is specifically towards transportation and consideration -- increasing consideration of how they would like to see their areas grow with traffic and other issues. That was the first six meetings.

The second six meetings were an educational series of meetings talking about CEQA, NEPA. This is the California Environmental Quality Act, which is the state environmental regulation, and NEPA, which is the National Environmental Policy Act which is the federal environmental regulation. So CEQA and NEPA allows people to actually do Q and A between the audience and two environmental specialists who were able to try to answer as many questions as came up that evening.

We are now in scoping, also on the record. So this is a very exciting time because we are getting ready to take your comments on the specific project, and actually Garrett Damrath for Caltrans is going to be joining me in just a moment to talk a little bit more about that.

The two packages that you received -- I want to make sure that you got them. One is the information packet which has a lot of information including a comment card. Please take a look at that comment card. The comment card is very important. Make sure your name and address is on it because of the fact that it's important to have your address to make sure the information gets on the record. Whatever you put on that and you put in any of our boxes throughout the whole room actually goes on the record because we are in

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the process right now of gathering data and information we will input for scoping.

There's also an exit survey in that first initial packet. Please fill it out. It really helps us do a much better job in the exit survey. You can also put that in the same box that we have out there.

The CEQA and NEPA packet is an overview for you who may or may not know about the -- what is called CEQA office flow chart and the NEPA office flow chart. Those are important pieces of information, and they are actually included in specific questions because a lot of folks don't always know a lot about the CEQA and NEPA process. And that's what our main focus was in that series of meetings: To make sure that you knew how it would go on the record. So I need to double-check on one thing here.

We have actually wanted to talk about the first six meetings for the introduction of transportation issues, the six meetings for CEQA and NEPA, and then we have six meetings for going on the record for scoping. I want to share with you this evening we have added two additional scoping meetings, and I wanted to give you that information this evening because I think it will be helpful for you. Typically you get one, so these are pretty amazing, but here is the release of the dates.

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It just got settled today. We just got the locations and to make sure that we have everything. I wanted to share that.

You will be the first ones to get to know this. So on April 5th we are going to be meeting in La Canada. We're going to be at the La Canada High School, and it's going to be the same information and time from 6:00 p.m. to 8:00 p.m. And it's going to be in the cafeteria. The next meeting is going to be the very next night. It's going to be April 6th. It's going to be in Highland Park. And it's going to be at the Ramona Community Center.

Now, for those of you who have signed in, we have made an extensive database on all of the sign-in sheets, and we have a very extensive e-mail distribution list that we will be sending you, like, the save the dates for us. We have been attaching information that gives you all six dates. So we will be sending out an additional e-mail so that you have the location and the information -- the time and location and all that for all those meetings.

I'd like to introduce Garrett Damrath, who's with Caltrans. And he's going to be providing an overview for you tonight to include an overview of the introductory scoping process, and then we'll actually

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have an opportunity to have people come up and have an opportunity to have your oral comments on the record. And I'll talk a little bit more about that on how to participate. There are four or five different ways to do that. We're going to give everybody an opportunity to speak two minutes apiece. I have speaker cards.

Oh, before I forget, did all of you get a chance to get a permit for your car? Did you all get those? Okay. We have -- we can take care of that for you. If you would like, we've got the permits, and we will make sure that we take care of that for you. You may want to go back to the back table, and we'll actually make sure that you get your permit -- just to make sure that you get it.

Anyway to go back to this evening, we'll have you come up, and your oral comments -- we have a court reporter here. Everything is being recorded tonight; it is legal. It goes in the record. We are on the record tonight. So you get a chance to do oral comments, written comments, and still if you go home -- and you'll take those comment cards home with you -- you still have the opportunity to mail it in. That actually will give you multiple ways to make sure that whatever you feel -- to make your comments get on the record.

So tonight after Garrett's finished with his

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presentation, we'll get back up here, and you'll have a little timer, and so you'll just know when your time's close to run out. But we wanted to make sure it's fair so everybody has the same amount of time.

So Garrett, would you mind coming up.

MR. DAMRATH: Good evening. My name is Garrett Damrath, and I'm a senior environmental planner with Caltrans, and I'd like to thank everyone for coming out tonight to participate in the scoping process.

In 1978 the United States Environmental -- Council on Environmental Quality defined scoping as an early and open process for identifying important issues related to environmental actions. That was a long time ago, and back then, it was more of an agency-related event. We wanted to make sure that agencies did not have conflicting interests. After a while, it was more of a public forum to the point where we have one agency meeting, and now we're having eight scoping meetings for the public.

The scoping process is a very flexible process and dynamic, and we try to adjust it as we go through. We have the previous 12 meetings in which we took the information in which we were able to fold it into the scoping process here. And I just want to emphasize that no decisions have been made at this point. We're merely

coming to the public to seek comments and suggestions on this format here for Caltrans.

Why are we here? Previous studies have indicated that the SR-710 gap contributes to growing congestion on nearby freeways and arterials. There was a record of decision in 1998 for a surface route. That record was rescinded in 2003, and continued project development was prohibited without further environmental work. Measure R was then voted by a two-thirds vote of L.A. County voters to approve funds to address transportation problems throughout the county including the 710 gap. And then the Metro Board adopted the motion to move forward with the environmental phase.

Scoping for solutions -- we have convened a series of 18 -- and now there will be 20 -- public meetings to provide engaging and instructional dialogue and maintain an open and transparent process. We solicit broad participation and input and facilitate and continue SR-710 conversations through social or electronic media platforms.

We scope -- the purpose of scoping is to identify issues to be addressed in the environmental documents. The lead agencies for CEQA and NEPA are Caltrans. Because Caltrans is a state agency, we have the state CEQA law, and because the federal government

has delegated the authority through -- for NEPA to Caltrans, we also are the NEPA agency. And we need to get all of your comments to us by April 14th.

So your role in scoping lends -- as I said, we're early in the process. So before we can start the environmental study, we wanted the public to give us input as well as federal, state, and local agencies. What we're trying to solicit from the public and these agencies are potential alternatives, issues and impacts to be analyzed, and the level of detail that you'd like to see in the analyses.

And how would you do this? Well, we come to these meetings, and you provide oral testimony as you will in a moment. You can also send written comments -- submit written comments to us, and I'll give you some information about that in a moment. And Mary will give you some more information about how to do media or electronic media.

This is the project study area for now. It's very vast. It's a large area, but it has a very large problem. Our preliminary position, and as I said, we do gather information from our previous 6 or 12 meetings. There is some stuff in here you may recognize. But the purpose is -- I'll read them -- improve the regional mobility and accessibility for movement of people,

goods, and services; reduce circuitous out-of-direction travel on the network; reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips; improve regional travel-time savings and thereby reduce loss of productivity associated with congestion; provide additional connectivity in the regional network by public transit; improve regional and local mobile source air quality characteristics; reduce greenhouse gases from mobile sources; provide a project that constrains impacts on local communities to acceptable levels; and develop a financially feasible project taking into consideration cost effectiveness and viable funding strategies including public and private partnerships.

At this time we see as an alternative that we have on our range of alternatives. We're looking at route neutral surface and subsurface highway and freeway; heavy passenger and freight rail improvements; bus/light rail system improvements first and last mile especially; local street upgrades including signal synchronization, pedestrian and bike access improvements; traffic management systems; and the no-build alternative.

There are some new factors that we have to take into consideration. There's the multimodal

transportation landscape that's out there now; the emerging environmental issues and advances in technologies; potential funding and revenue sources; and project delivery and procurement methods.

Some of our project milestones are the public outreach which has begun for a while now, six weeks, and the issuance of the Notice of Intent and Notice of Preparation which was done back in February, and the public scoping meetings which is what we're doing tonight. After that we will draft the EIR/EIS and have public hearings to go over the results of those reports. From those comments that we get on the draft, we will prepare a Final Environmental Impact Study and Impact Report, and a Record of Decision and Notice of Determination will be made from the results.

The environmental document, as I said, we are going to be preparing an Environmental Impact Report pursuant to CEQA, and Environmental Impact Statement pursuant to NEPA.

And if you want to give written comments by mail, you can mail them to Ronald Kosinski who is the deputy district director for the division of environmental planning at Caltrans District 7. And the address is in your packet and on the board.

And I would like to thank you very much again

for coming out. This is a very important process, and we encourage your input. Okay.

MS. McCORMICK: Okay. Thank you. Great. So could I have the lights on up here, please? Thank you.

Okay. We have several speakers who have asked to participate, and I wanted to just explain the timer a little bit. The green starts, and you will have literally twenty seconds, and then it turns yellow. And then when it turns red, you have about ten seconds left, but remember, everything goes on the recorder. The court reporter is making sure that we get everything on the record. So what I'll do is I'm going to call up a person, and then we will mention the name of the person right behind them so that you know. When you have to come up here, you know.

So number one is Rhoads Stephenson. Thanks, Rhoads, and then next, Earl Smyth is second. So Rhoads, go right ahead.

MR. STEPHENSON: Okay. Yeah, I'm Rhoads Stephenson. You need my address?

MS. McCORMICK: Yes. Please give your name and then your address. Thank you.

MR. STEPHENSON: That shouldn't be part of the two minutes, though.

MS. McCORMICK: No.

MR. STEPHENSON: 4455 Rockland Place, Unit Number 10, La Canada, zip code 91011.

I have four topics, and I'm going to give them very quickly and probably just so I get them all on the record within two minutes, and maybe I can talk again later.

I am going to give the simplest ones first. I think it should include a no-toll-road option. I have heard talk that you might collect tolls, but I think that is going to create more congestion than is saved.

And the second scope item as a mitigation item has to do with including the installation of sound walls on the 210 to help mitigate any increased noise from increased traffic as a result of this project.

The third and fourth items have to do with the issue of trucks. I think most people object to this project because of the fear of massive increase in truck traffic throughout these areas. So I have two ideas that have to do with trucks. So my item number three is to have a rule that there are no trucks allowed north of the I-10 freeway. We have a precedent for that with the Pasadena freeway -- no trucks, and this would probably reduce a lot of the bad impact from this project.

Last but not least, I think -- and this is probably my most important suggestion -- we should

reduce truck traffic by requiring all nonlocal freight to leave the two Los Angeles ports by rail. Everything should come out by rail. No trucks except for local deliveries. And the LV recorder could be expanded to handle this load, and we should encourage the trains to stay on this route -- the freight to stay on the train until it gets to its destination city. And this would have a huge savings in terms of air pollution, greenhouse gases, energy, noise, traffic congestion, et cetera.

I got it all in two minutes. Thank you.

MS. McCORMICK: Thank you very much.

MR. STEPHENSON: Did you get it all?

MS. McCORMICK: So thank you for that.

Earl Smyth and then Sally Balonick is next.

MR. SMYTH: I think that this project will have a significant impact on --

THE REPORTER: Your name, please.

MS. McCORMICK: Your name and address, please.

MR. SMYTH: Earl Smyth. I live in La Canada for about ten years, and I think that this project will have a significant effect on our air, and we will not be able to -- and it won't be the same. I wish there were a different way that we could do it. So I know it will affect our schools. There will probably be more stuff

in the air that won't make it as beautiful as it is now. Thank you.

MS. McCORMICK: Thank you.

All right. Sally Balonick and then Mr. Mike Lawlor is after Sally.

MS. BALONICK: Sally Balonick, 10203 Mt. Gleason Avenue, Sunland. My main question is how many landfills are we going to drive through -- drill through? Preexisting landfills that are no longer in use. They completed their fault. They now have built on top of them. I'd like to know how many you are going to drill through.

I am a parent with four children who are athletes who participate on the high school fields right along the 210 freeway. Diesel. I know from standing on the fields watching my children play, the diesel trucks going down the 210 freeway right now are horrendous. They're loud. The pollutions are enough to when you stand there on the field with a handkerchief over your face while you're watching your child play soccer, running. Soccer games, 90 minutes average. My child runs anywhere from seven to nine miles per game. She does have a cough today from this.

So I would like to know what you're going to do about the pollution and the gridlock on the 210 that's

already there in existence. And your tunnel will increase it by about 25 percent. That's my question.

MS. McCORMICK: Thank you.

Mike Lawlor and then Andrea Nathanson is next. Oh, you've done that? Typed in -- please -- it's already recorded. Okay. Thanks. No problem.

So Mike, then after Mike is Nat Read.

MR. LAWLOR: Okay. Mike Lawlor, 2717 Altura Avenue, La Crescenta, 91214. My objections to closing the gap are mainly financial. I feel it's an incredible amount of money to be spending on a tunnel project because I feel the money could be much better spent moving toward the future of transportation rail. I think we need to push our money towards light rail, to put our cargo onto rail, and that's the way to go. So I would object to a gap closure, particularly by tunnel.

MS. McCORMICK: Thank you.

Next is Nat Read, and then Sherry Stubbs is after Mr. Read.

MR. READ: Thank you very much. My name is Nat Read. I live in Glendale, first moved here in 1957, lived here in four different houses here.

I would first like to say that the freeways should not come through Glendale. They should not be brought up the 2, should not go through Mount

Washington, should not go through Glassell Park, and I will march with those citizens against any notion to do that.

The five fingers of that plan are political options, not an engineering option to connect the stubs. The latest environmental study showed that completion of 710 would benefit my city by reducing traffic on the 5, from the 2, and the 134. We need studies to update that, so that we're talking about fact and not opinion about what the congestion would do.

Next I would like to mention that a poll of citizens of Glendale showed that they favor completion of the 710 by two and a half to one. I think that should be taken into consideration.

And last, if I can get through this, I want to speak for my late wife who was the president of the board of trustees of this institution whose reception memorial refreshments were in this very room. She felt passionately before her death about completion of this freeway because of what she felt that it was the responsibility of this generation to not kick the can forward, but to leave a transportation system that served her students, their children, and their grandchildren. Thank you.

MS. McCORMICK: Thank you, Mr. Read. Could you

please give us your address for the record, please.

MR. READ: I'm sorry. I'm Nat Read, 3030 Edgewick Road, Glendale.

MS. McCORMICK: Thank you.

All right, Sherry. Then after Sherry is Susan Bolan.

MS. STUBBS: I'm Sherry Stubbs, 3200 Fairesta Street, Unit 11, La Crescenta. Addressing Mr. Read real quickly, he has taken a no resolution against the town. My comments are primarily back to basics, and I'm saying them for possible future litigation, but so that they are on the record.

I do not believe closing the 710 gap is a project but rather a goal. All Metro/Caltrans action has shown that a tunnel project is their solution for the 710 freeway gap closure. However, to me all the meetings -- session one, two, and now three -- have been general in nature, not applicable to a specific project.

Scoping applies to a specific project. Because I do not believe these meetings have involved a project, I also do not believe what is being billed as scoping is applicable. Any assertion that scoping is to determine purpose and need rather than define a project is at best misleading. And until tonight no information that staff has presented has applied to the 710. Only the

questions from the public have alluded to the 710. That is insufficient to constitute any 710 project for purposes of scoping compliance.

Therefore, if scoping is the prerequisite for part of the EIR, they can proceed no further. Metro's actions have belied and made a part of the meeting, making them meaningless and have no purpose for that. Thank you.

MS. McCORMICK: Thank you.

Susan Bolan and then Lee Dolley.

MS. BOLAN: Hi, good evening. Susan Bolan, 3528 Prospect Avenue, La Crescenta, 91214.

With all due respect to your deceased wife, Mr. Read, I just want to point out that Nat Read is a paid lobbyist. And by saying that the tunnel shouldn't be built in Glendale but maybe elsewhere may be a bit of a NIMBY.

That aside, my concern is the I-710 is currently going through the final draft -- I mean the final EIR process. While it's not connected directly, it's definitely connected in my mind. The I-710 is being expanded up to 14 lanes, and that is due to the growth of the port. If it is expanded to 14 lanes, when it gets to the 10 area up around Valley Boulevard, what will we do if it's narrowed down to, say, six into a

tunnel? And there will be a toll, so people will spill off the freeway, and we'll still have congestion. So we definitely need -- in the EIR process, we need to look at both projects as one project. That's very important.

Number two, Measure R was not a mandate to build the longest road tunnel in the United States. The voters voted for good transit projects which we support, but it was not to build the tunnel. La Canada in conjunction with USC did an analysis, and their analysis reported that if the tunnel is built, 850 additional trucks will be put on the 210 freeway. The freeway tunnel will open with a gridlock level F. Grade level F which means gridlock. So that your study that you are reporting on definitely does not report it will relieve congestion.

MS. McCORMICK: Thank you.

Lee Dolley. And I don't have any other speaker cards, and so if you'd like to fill one out, please do so right now. So right now, Mr. Dolley, you're our last speaker.

MR. DOLLEY: Lee Dolley, 111 South First Street, Alhambra, California. So just none of you want to go after me like Mr. Read. I am a former city attorney for 25 years in the city of Alhambra. Mr. Read should be respected, and I ask for respect, and I will

respect you.

We want the best Environmental Impact Statement ever done in California. We want every single thing to be covered. We want every question that's been asked in this room and all other rooms to be answered if they can be answered to actually produce the very best Environmental Impact Statement/Environmental Impact Report we've ever seen.

For this evening I just want to make a very short observation. And that is, you all remember the SR-710 tunnel study and that it came out in a route neutral study with about five different tunnels that could be aligned to finish the freeway. We want to say that we'd like to see number one and number four and number five eliminated very quickly. But we'd like to see a really good study of number three and number two. That's my comment, and I'll leave this here with you. Okay.

MS. McCORMICK: Thank you very much.

MR. DOLLEY: Thank you very much.

MS. McCORMICK: You're welcome. Do we have any other folks who would like to go on record this evening?

Okay. Well, all of the stations are still open for information if you'd like, and we have folks here from both Metro and Caltrans if you have any questions.

And we're not going anywhere. We're going to keep the room open for another quite some time. So please feel free to stay if you'd like to take a look at the other stations. But at this time I guess we're closed for oral comments. Thank you so much for coming this evening.

SUMMARY OF MY 4 COMMENTS GIVEN ORALLY ON MARCH 22, 2011

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 22, 2011

NAME: RHONDS STEPHENSON

ADDRESS: 4455 ROCKLAND PL, #10 CITY: LA CANADA ZIP: 91011

REPRESENTING: SELF

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

(1) INCLUDE NO-TOLL OPTION

(2) INSTALL SOUNDWALLS ON THE 210 TO MITIGATE NOISE

(3) ~~ALLOW~~ NO TRUCKS ALLOWED NORTH OF THE I-10

(4) REDUCE TRUCK TRAFFIC BY REQUIRING ALL NON-LOCAL FREIGHT TO LEAVE THE 2 PORTS BY RAIL.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 22, 2011

NAME: Lee Dolley

ADDRESS: 111 S First CITY: Alhambra ZIP: 90801

REPRESENTING: City

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

TESTIMONY for the RECORD
SR 710N Gap Closure Project
Scoping Session #3
March 22, 2011

The recently completed SR710 Tunnel Technical Study, October, 2009, used a "route neutral" approach to study the geotechnical feasibility of 5 "zones"; or potential route areas for a tunnel. In these scoping meetings, we have heard a preference stated for Zone 2, which would connect the Terminus of the 710N to SR Route 2 to close the gap.

The Tunnel Technical Study found all 5 zones to be feasible and did not define a superior or preferred alternative. The findings of the Study as they pertain to each Zone, can, however, be used to define which alternatives are to be studied for a tunnel solution in the Gap Closure EIR/EIS.

We would like to go on record as supporting Zone 2 and Zone 3 tunnel routes for further study in the alternatives analysis section of the EIR/EIS. We further support the deletion of Zones 1,4 and 5 from further consideration at this time.

E-4 – South Pasadena

SR-710 Conversations
Public Information and Education Meeting

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Richard Schneider	SP. City Council	Councilmember	1414 Mission St.	S. P	626 4037218	rdschneider@yahoo.com
PHILIP PUTNAM	"	"	"	"	"	PUTNANCE mailaway.com
Sally Kilby	S Pas	City Clerk	" "	"	403 - 7232	skilby@ci.south-pasadena.ca.us
Julianne Hines	Assemblymember Portantino	District Director	215 N. Marengo #115 Pasadena 91101		626 577-9944	julianne.hines@asm.ca.gov

South Pasadena High School, March 23, 2011

SR-710 Conversations
Public Information and Education Meeting

MEDIA SIGN-IN						
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Jennifer	Patch	editor				

South Pasadena High School, March 23, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

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John Podhech		400 Winthrop Rd	San Marino 91108	626-799-4297				
Garrett Damrath	CT							
GARY PETERSEN	PARSONS							
DEREK HIGA	CT DESIGN							
Evelyn Zneimer		1449 Indiana Ave	So Pasadena 91030	(323) 258-1231	ezneimer@socal.rr.com ✓			
Ainsley Chiang	CT Design							
Sherri Kung								
FRANK WADA	LINCOLN HTS N.C.	2038 WORKMAN ST	LA 90031	323 225-1012	FWADA2K2@YAHOO.COM	YES		
~~Diego Martin~~	~~SGVCOG~~	1000 S Fremont						
Kelly Owings Toledo	Caltrans Env. Plng	100 S. Main St. Los Angel.	91722			NO		
Sam Tso		706 N. 7th St. Montebello	90640					

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SR-710 Conversations
Public Information and Education Meeting

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~~Richard Schneider~~	~~SP City Council~~							
Jan Soohoo		1139 El Vagost	La Canada	818-952-4103	jan@soohoos.org	✓		
Sarah Ghandour		2139 N. Beachwood Dr #1	Los Angeles	612-710-3544	sarah.ghandour.design@gmail.com	✓		
Carol Teutsch		841 Moon Ave	LA 80065	3233528079	cb.teutsch@comcast.net	✓		
Wayanna Kato		SCE # 1 & 2						
Lem Sadatrajadi		~~444~~ S. Flower St.	LA 90071	213-447-5366	sadatrajadil@pbworld.com	✓		
DAVID THOMAS		645 E. CARNEGIE DR. STE 210	SAN BERNARDINO 92408	909-888-4106	thomasd@pbworld.com	✓		
Jim de la Loza		200 S. Grand Ave	~~LA~~ L.A CA	(213) 700-5449	delaloza3@aecom.com	✓		
Tuz M		313 S. Cordova St Alhambra	91801	626 588-2577				
Stuart Warren	HMM	1409 Oaklawn Rd Arcadia	91006	626 695 7170	Stuart.warren@hatchmott.com	✓		
HARLEY MARTIN	URS	2020 E FIRST ST SANTA ANA, CA		714-648-2559	HARLEY-MARTIN@URSCORP.COM			

Metro

SR-710 Conversations
Public Information and Education Meeting

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Peter Champion	CT							
Le Chen	CT	100 S. Main St Los Angeles, CA	90012	(213) 897-4191	le_chen@dot.ca.gov	No		
Daniel Wong	Kimley Horn	765 the city drive, #400	92868	714-765-1308	daniel.wong@kimleyhorn.com	Yes		
Eugene Kao	—	5805 W. Duarte Rd., unit 15	ARCADIA 91007	626-447-7064	—	No		
Teresa Wong	Resident	1870 S. Los Robles Ave San Marino, CA 91108		626.799.2079	teresawong91108@gmail.com	Yes		
ALICE N. HARRIS	"	2012 Alpha Ave	SOUTH PASADENA CA	323-257-7264	X	—		

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Irma Flukelstein	PB	Pasadena	91107					
Samuel Zneimer	City of South Pasadena	1414 Mission St	91030		szneimer@ci.south-pasadena.ca.us			
SAM BURGESS	NO 710 ACTION COMMITTEE		SOUTH PASADENA		SAMBURGESS@SBCGLOBAL.NET			
Steve Dubnewych		PASADENA						
HARRY KNAPP	"	417 EL CENTRO	S.P 91030	626 441-6147	HCKNAPP@EARTHLINK.NET			
CLARICE KNAPP		✓	✓	✓	✓			
Lisa Padilla		16 N. Marengo Ave. #412	91101 Pasadena	626 304-9034	(already in your LIST)			
Nat Read	Read Communications	100 E. CORSON ST. #200	Pasadena CA 91103	626 578 0705	nat@natread.com			
Janet Ervin		801 Meridian Ave. S. Pas.	91030	626-441-7264	JERVIN626@SOCAL.RR.COM			
Tim Inta	CH2M Hill	10000 Wishire BLVD	Los Angeles		tinta@ch2m.com			
Adam Mai	Senator Kevin de Leon	617 S. Olive St. ~~#~~ 710 LA, CA 90014	90014	213-612-9566	adam.mai@sen.ca.gov			

CALTRANS / METRO
SR-710 CONVERSATIONS

PUBLIC SCOPING MEETING

WEDNESDAY, MARCH 23, 2011
SOUTH PASADENA HIGH SCHOOL,
SOUTH PASADENA, CALIFORNIA

South Pasadena, California, March 23, 2011
-0-

MS. McCORMICK: Good evening, everyone. My name is Mary McCormick. I'm with a company called MBI Media. We're actually going to be the facilitators for your meeting this evening. And we're very happy that you're here.

Okay. We have two translators here, and we are in the middle of scoping. I will give you an overview, and then ask my translators to come up. We are in the third stage or third series of a set of meetings that are preparing people for facts tonight. We have introductory information on transportation issues throughout the community and region.

Then, secondly, we have a full series, an educational series for the environmental processes -- the state process, the California Environmental Quality Act, and the federal process of the National Environmental Policy Act. So we were preparing and providing a variety of pieces of information to get us here tonight.

Tonight we are in scoping, and scoping is the process that you go through so that you can actually go on the record legally when you have interests, ideas,

suggestions for a possible -- for the environmental process and environmental report that's going to be coming up on the SR-710. So that's what we'll be here doing tonight.

So we have a lot of information for you, but prior to us getting started, what I'd like to do is I'd like to introduce Joanna Amador and Charlie Gu who will be speaking in both Spanish and Mandarin for those in the audience who would like us to help them with translation.

(Whereupon the interpreters addressed the audience, but it was not reported.)

MS. McCORMICK: Thank you, Charlie.

With the weather outside, we've actually brought everything inside, and so we have a lot of our funding sheets here and our speaker cards and folks at the door that can actually help people sign in as they come. But if you'd like to speak tonight, there's a special speaker card that if you would like to fill that out, you'll have an opportunity for you to have your comments a little later this evening.

You received two packages of information this evening. You are receiving an information packet. In that information packet, you have a variety of pieces of information. We gave you the dates for all of the six

scoping meetings, and we actually have two additional meetings that I will be telling you more about a little later this evening. One will be in La Canada on April 5th, and one in Highland Park on April 6th. That information -- we'll make sure that you have that by the end of the evening.

So there will be multiple opportunities. Even after tonight there will be multiple opportunities for you to have your comments put on the record, the legal record, and that's what's really important for this evening.

I don't know if you all had a chance to go through this, but we wanted to share with you also there are multiple ways to go on the record, but more importantly you should note for the first time Metro actually is going on the record online.

So we have a whole social media area there, and on the 21st, March 21st, Monday of this week, we actually started our very first meeting online. So we have to be in this -- as funny as it is to understand that, it's actually a three-week meeting, so we started on Monday. It went from 6:00 to 8:00. We had several participants. It was very exciting. Everyone got the chance to get online.

And you can go online and register for the

meeting, and you can actually put your comments on the meeting on that meeting, and it will go all the way to April 14th. It started on March 21st, and it will go all the way to April 14th for you to have more comments.

So actually as you leave this evening, if you have an opportunity or you forgot something, don't forget that in your packet, your information packet, you have a comment card, and there is some information up here as well. And you'll get more information about how to send it in.

But you have the computer here. If you don't want to write it, you can actually type in the information, and that will go in. You can write the comment card. You can submit it in any of the boxes we have here in the front. You can take the comment card home. You can actually mail it to Mr. Ron Kosinski at Caltrans in Los Angeles, and you can go online as well.

And then, of course, tonight we orally take your comments. We have a court reporter here this evening who is actually taking your comments and putting them into the legal record. So we have a legal court reporter here tonight for you.

So what I'd like to do now is I'd like to introduce Garrett Damrath who's an environmental specialist from Caltrans, and he is going to be

providing an overview and more of an introduction for you for the scoping process so that you have a little better idea of how to move forward.

MR. DAMRATH: Good evening, everyone. My name is Garrett Damrath, and I work for Caltrans as a senior environmental planner. I'd like to thank you for taking the time out to come to this important meeting, and on behalf of Caltrans and FHWA, I welcome you.

In 1978 the U.S. Council on Environmental Quality defined scoping as an early and open process for identifying important issues related to the proposed action. Since -- at that time it was based mostly on agency coordination to make sure that we didn't have conflicting -- or make sure that we had corroboration and didn't have any conflicting interest. But as time went by, it became a more public forum, and it evolved into what we're doing here tonight. So there's four or eight scoping meetings in a series of 20 meetings total.

So scoping is a very flexible process, and we have been adapting as we have gone through these series of meetings, and I want to assure everyone that no decisions have been made at this point, and we're just here to solicit statements and comments in regards to scoping.

I have a -- help is right here, and I'm not

very good at -- move it this way. So why are we here? Previous studies have indicated that the SR-710 gap contributes to growing congestion on nearby freeways and arterials. And that was put into the one reference we have here in the 1998 record of decision. But there is a myriad of other studies that have looked into this problem. In 2003 the ROD was rescinded, and continued development of the project was prohibited without new environmental work, which is why we're here today. Measure R was passed by a two-thirds vote in L.A. County, and it was to fund and address transportation problems throughout the county, including the 710 gap. And then the Metro Board adopted motions to move forward with the environmental phase which brings us here tonight.

Scoping for solutions -- just like I said, the scoping process has grown, and we have convened a series of 18 public meetings. We have provided engaging and instructional dialogue and tried to maintain an open and transparent process. We have solicited broad participation and input, and we're trying to facilitate and continue SR-710 conversations through social and media platforms.

So the scoping meeting -- the purpose of scoping is to identify issues to be addressed in the

environmental documents. Caltrans is the lead agency under CEQA and NEPA. NEPA was the NEPA authority delegated to us by the Federal Highway Administration, and so we signed for both NEPA and CEQA now. And our written comments -- as Mary said, we need to have them in writing by April 14th.

So the role in scoping -- when, as the U.S. Council said -- the Council on Environmental Quality said, an early and open process so we started actually before we do any technical studies on the final project. And who we want the comments from are the public, federal, state, and local agencies. What we're trying to identify are potential alternatives, issues, and impacts to be analyzed, and the level of detail that should be analyzed in those analyses. And the way we do it is by coming down here and providing oral comments, or providing written comments by mail, or by any one of the other social media outlets that we have.

That's the current project study area, and you have to use the entire San Gabriel Valley.

The primary project purpose and need -- for this I'm just going to go ahead and read it for you. We want to improve regional mobility and accessibility for the movement of people and goods and services; reduce circuitous out-of-direction travel on the network;

reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips; improve regional travel time savings and thereby reduce loss of productivity associated with congestion; provide additional connectivity in the regional network by use of public transit; and improve local and regional and local mobile source air quality characteristics; reduce greenhouse gas emissions from mobile sources; provide a project that constrains impacts in local communities to acceptable levels; and develop a financially feasible project taking into consideration cost effectiveness and viable funding strategies including private/public partnerships.

The project alternatives at this time are route neutral surface and subsurface highway or freeway; heavy passenger and freight rail improvements; bus and light rail system improvements including the first and last mile; local street upgrades including signal synchronization, pedestrian and bike access improvements; traffic management systems; and the no-build.

Some of the new factors that we've been considering are multimodal transportation landscape; emerging environmental issues and advances in technologies; potential funding and revenue sources; and

project delivery and procurement processes.

Our public -- our project milestones are public outreach; the issuance of the NOI and the NOP; and public scoping meetings which is where we're at right now; and as we move forward, we will prepare a draft environmental document which is the EIR/EIS; have public hearings for that draft; prepare the final in consideration of all the comments we have received from the public and agencies; and then prepare a record of decision and notice of determination under CEQA and NEPA.

And as I said before, our environmental document type is an Environmental Impact Report under CEQA and Environmental Impact Statement under NEPA.

For formal written comments by mail, please send them to Ron Kosinski, deputy district director of environmental planning in District 7 at Caltrans. The address is here as well as in all of your packets.

UNIDENTIFIED SPEAKER: It is incorrect in this folder. You have a zip code that is 90504 for Downtown L.A., and it is not -- but it is not correct, and on your slide it is not. It is incorrect.

MR. DAMRATH: So, okay, we'll take a look at that and make sure it's changed. Okay. Thank you. We would like -- okay. This is the address that we want

you to send the comments to, please. Thank you. And we do want those written comments and scoping by April 14th, 2011.

And thank you very much for your interest in this transportation project, and we look forward to your comments. Thank you.

MS. McCORMICK: I'd like to introduce Andrea Campbell. Andrea is working with us on a specialty slide, and she has a couple of pieces of information she'd like to share with you.

MS. CAMPBELL: I would just like to clarify regarding a point that was made on how you could comment on the official record. Regarding social media, any comments that are made on Facebook or Twitter -- they're not considered as part of the official record. But you can make comments to our virtual meeting site at http.metro.net/sr710conversations where there's an online comment forum, and there is a -- as long as you put in your address and get it in by April 14th, that will be considered as part of the official record. I wanted to clarify that one for you all.

UNIDENTIFIED SPEAKER: Are all of the slides in the packet that have been shown there?

MS. McCORMICK: Two pieces of information. The talk, the presentation he made isn't in the packet, but

the information on how to participate is. So all of the different opportunities for participation information should have a special sheet.

And then there is an information sheet on how to contact Metro. This one whole sheet is information on that. But you wanted to know if the PowerPoint is included. No, it's not, but it is on the virtual meeting site.

MS. CAMPBELL: So to register for the virtual meeting site by going to metro.net/sr710conversations. Right there on the page, there's a big button that says registration for virtual meeting, and there you can access all the materials that you see here tonight are available for you to review and download.

UNIDENTIFIED SPEAKER: Are there separate comments on the Metro Web site, or are there comments on the neighborhood meetings on the Web site?

MS. McCORMICK: I can't speak to the geotechnical.

UNIDENTIFIED SPEAKER: The geotechnical -- I didn't see the comments. I think that would be Caltrans, and you have that -- that I'm not sure that's set up, but I'll go to the Caltrans site.

MS. McCORMICK: Thank you. What I'd like to do is I'd like to thank some of our elected officials for

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attending this evening. Dennis Woods who's the transportation manager for the city of South Pasadena, thank you, sir, Dennis. Diego Martin from the San Gabriel Valley Council of Government. Thank you for coming. Richard Schneider, South Pasadena City Council member and Philip Putnam, also, he's with the South Pasadena City Council. Sally Kilby, who is our City Clerk for South Pasadena, and Julianne Hines with Portantino's office. Thank you all for coming. I appreciate you coming and being here.

So what we have now is we actually have an opportunity for people to come, and I have three speaker cards. If there's anyone else that would like to fill this out, we'd love to hear from you. What I'd like to do -- actually, I have two, and for -- what we would have, if you want to come up, please do so.

We have right over here is Chris Prouty, and he actually has sign-in sheets, and he also has the timer. We have a microphone for you, and so that our reporter may take your comments on record.

And for our first one is Jan SooHoo. Jan, will you join us, please. And then Carol Teutsch is back right behind her. And those are the two that we have currently, but if you'd like to speak, we'd love to have you do that.

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We have a timer, and you will see that we have about 20 seconds left, until it turns yellow, and then you've got 10 seconds -- it goes red. So everybody has the same amount of time. Okay. Please join us.

UNIDENTIFIED SPEAKER: Can I speak from here? Can everyone hear me?

UNIDENTIFIED SPEAKER: No, please come up here for the court reporter.

MS. SOOHOO: My name is Jan SooHoo. I'm a resident of La Canada Flintridge.

As pointed out on the slides today and as stated at the Alhambra meeting in the last go-around, the purpose and need as being addressed by Metro is the -- and I quote -- the problem we're addressing is congestion in the local arterials and the freeway network in the area. The problem is that Metro has yet -- or Caltrans -- to show us any specific data, data specific to this area, the study area, the problems area, that demonstrates that building additional lanes either by widening the south 710 or connecting the north 710 to the 210 will, in fact, relieve congestion.

In fact, the literature, transportation literature, is full of studies that demonstrate that adding additional roadways and lanes never, virtually never, relieves congestion. It's the common solution,

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but it doesn't work. I would quote one specific study, though many, many transportation institutes have published papers that support this conclusion. And reason would dictate that building additional roadways would work, but it doesn't.

The Surface Transportation Policy Institute dealing with 15 years' worth of texts of transportation institute data from 70 major U.S. metropolises found that both 70 were ranked by the number of lanes they added divided into a high-build and a low-build group, nothing improved in the high-build group. Congestion did not improve, so there was no difference. Okay. In fact, this has been -- this kind of result has been substantiated due to a phenomena called induced demand. People find now temporarily clear routes or routes that it used before, soon they fill them.

A group of people, researchers from UC Berkeley -- I'm almost done -- studied 17 major metropolitan areas -- or I'm sorry -- 30 major metropolitan areas in California and found that for every 1 percent increase, every 1 percent increase, a new roadway was reduced or defeated by 9 percent increase in traffic within five years; .9 percent effectively neutralizing the temporary congestion relief.

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So my challenge to Metro in my written comments which will be addressed to them, is to show us, okay, the taxpayers of this state, the building -- the building of these additional lanes on the north and southbound freeways, 710 freeways, will, in fact, relieve the congestion that they report as their purpose in doing this. So far I'm unconvinced. So far I don't think anyone has seen any conclusive data. Thank you.

MS. McCORMICK: Thank you, Jan.

Carol. And then following Carol, Nat Read.

(Pause in the proceeding.)

MS. TEUTSCH: Carol Teutsch, 841 Moon Avenue, Los Angeles, 90065. I have lots of concerns about this project and the process which I have been following closely for the last year and a half.

Without a definition of purpose and need for this project, I wonder how the agency can properly discover and evaluate the alternatives -- filling of a six-year-old gap in the map which we have heard said to us over and over again is not an acceptable, thoughtful goal to meet the transportation needs of the region for the 21st Century. Defining the problem is critical before solving the problem. I believe the project has been improperly segmented in 710 south and 710 north as much as the cargo traffic begins at the port in the

south.

Scientific studies have clearly shown that lethal combustion and proximity of the highway or roadways with significant volumes of traffic have significant adverse impact on health and many health issues, not only asthma, but cardiovascular issues, risk of cancer, brain cancer, autism, abortion. There is a lot of data out there, and, therefore, we really do need a very thorough health-risk assessment but also a health-impact assessment done, particularly with attention to any sensitive receptors in that area.

We have been told in some of the Caltrans material that the air quality will be improved, but we have not been given any plausible information and scientific data to really confirm that with any really new evaluation. Generally, I think we need to do a better job completing an evaluation of the true externalities which are the cost of health impact the change in environment of quality of life, and also the GAO report that just came out that said there are some externalities which really make truck traffic unfavorable. So I hope we will have a very thorough and satisfactory EIR process. Thank you.

MS. McCORMICK: Thank you, Carol.

Mr. Read.

MR. READ: My name is Nat Read, 100 E. Corson Street, in Pasadena. I spoke last night at the meeting in Glendale as a citizen of that city. I speak tonight as chair of the 710 Freeway Coalition, which is a coalition of labor, of business, of cities in favor of completing the 710 freeway.

I've been involved in this for 40 years, 20 of those as a citizen nonpaid, 20 of those paid by the Coalition. Twenty years ago I came to a meeting in this auditorium that was jam-packed with the opponents of the freeway. And what has changed is the tunnel alternative, and I would encourage the study to focus on the tunnel. It is what South Pasadena asked in those days: Find a way that does not bulldoze our city. And the tunnel is that alternative.

Also I would ask -- and speaking of South Pasadena, in those days their own poll in the city showed that five to one people in South Pasadena opposed a surface freeway. A poll was taken after the tunnel alternative was suggested that comes out even: 42 percent for the freeway, 41 percent against, with a 5 percent statistical error, which means it's a wash.

On the subject of low-build, I want to point out that a very thorough study that was done by Caltrans on South Pasadena's low-build multimode proposal which

found that that would bring more congestion, so please base -- please use that in your studies of any low-build alternatives. Thank you.

MS. McCORMICK: Thank you. Is there anyone in the audience this evening who would like to go on the record with oral comments? Anyone else with a speaker card?

Okay. Well, I'd like to let you know that all the stations are open. We actually have Caltrans and Metro environmental staff here that can answer any of your questions if you have any questions regarding this process. We also have a lot of other information on how to participate. So again, if you would like to reach Mr. Kosinski at Caltrans District 7, this is the address, and so I think the information that was incorrect was not on the NOP. So this is the correct information, and actually we have some handouts here for the NOP as well, the NOI information. And there is a lot of handouts for you if you'd like to take that home and look at it this evening.

And one of the other items, the highlight of our conversation, we actually wrote. Even in this room, we did big Post-it notes, and we put all the information on it. And the way we historically captured that, we shot every single one for every single city for the six

cities that we visited three times -- that's 18 meetings -- and we actually have that here in a three-ring binder for you. So if you'd like to look at it, it's by date, and it's by city, and it gives you the overview of people who came together to talk about how they felt as a citizen, how to talk about their community and about their region as well.

(Whereupon questions from the audience were answered by the facilitator and/or representatives of Caltrans and Metro but were not reported.)

MS. McCORMICK: Linda just gave me a very good point. We're here to answer your questions this evening with Caltrans here, with Metro here. But the comments regarding oral comments or scoping are that's what's being recorded by the court reporter. So typically you have stations, and you come up, and people engage and get a lot of information that way. But the oral comments that you want to have it go in the record so that your comments are on the record actually come through the sign-in sheet. I just wanted to make sure that you understand that.

So is there anything else that we have this evening?

Okay. Well, please stay, and it's still raining outside, but we'd like to have you stay.

There's lots of people here that can assist and help you. We have several meetings. Again, let me go over them for you.

And next week actually -- so next week on March 29th, we will be in El Sereno. That will be at the Los Angeles Presbyterian Church. Then we're going to be in Pasadena on Wednesday on the 30th, and that's going to be at Lake Avenue Church, in Higgins Hall, and that is also from 6:00 p.m. to 8:00 p.m. And then the following week, we have La Canada and Highland Park, and we will have information on that as well.

UNIDENTIFIED SPEAKER: What is the address at La Canada?

MS. McCORMICK: Yes, it's going to be actually at the Ramona Community Center. Oh, I'm sorry. I'm sorry. Yeah, it's going to be at the high school, at the La Canada High School gymnasium.

UNIDENTIFIED SPEAKER: Do you have the address there?

MS. McCORMICK: Yes, I can get it for you.

UNIDENTIFIED SPEAKER: Is it the gymnasium or the cafeteria?

UNIDENTIFIED SPEAKER: It's at the cafeteria.

MS. McCORMICK: Oh, I'm sorry, the cafeteria. You know if you want to come up afterwards, I can get

that for you. But yes, La Canada will be at the La Canada High School, and it will be in the cafeteria. And that is also from 6:00 p.m. to 8:00 p.m. And then in Highland Park that will be at the Ramona Community Center. That's April 5th will be the La Canada, and April 6th will be Highland Park.

There are four more meetings that you can come to, plus all the other four or five different ways you can go online.

So thank you so much for coming. Have a very nice evening, and maybe we'll see you next week. Thank you.

E-5 - El Sereno

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Larisa Bolotsky	City of LA	Transportation Engineering Assoc.	100 S. Main St LA, CA	LA 90012	213-972-5024	Larisa.Bolotsky@lacity.org
Ronald Palacios	LAUSD	Director of Community Partnerships	333 S. Beaudry Ave 4	LA 90017	213-241-6088	
Carlos Chavez	Assemblyman Gil Cedillo	District Director	340 W Avenue 26 #121 LA CA 90031	LA 90031	323 225-4545	[illegible]
Paul Habib	CD14	Public Projects & Transportation Director	200 N Spring St #475 Los Angeles CA 90012	90012	213 473-7044	paul.habib@lacity.org
Patrick Horton	Temple City	Planning Commissioner	5130 Glickman Ave Temple City CA		(310)737-9334	patrickhorton4tc@gmail.com

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LA Christian Presbyterian Church, March 29, 2011

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✓Jorge Marquez Sen. Hernandez		Field Rep.				Jorge.Marquez@sen.ca.gov
Paul Talbot	City of Monterey Park		320 W. Newark Monterey Park, CA	91754	626-307-1247	
Nicholas Conway	SGVCOG	Exec. Director	1000 So. Fremont #A6	Alhambra 91807		
Tom Williams	LA32NC	LA32NC Board Mbr	4115 Barrett Rd LA 900	LA 90032	323-528 9682	ctwilliams@yahoo.com
Neighborhood Councils → Mike Roseberry	LA 32 NC	Board member	4966 Twining St	90032	323 3088967	

Hugo Garcia — El Sereno Organizing Committee.

LA Christian Presbyterian Church, March 29, 2011

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Tomas	Saucedo	4322 Winchester	LA	323)2229724				
Sam Tso		706 No. 7th St.	Montebello 90640					
Alfred Valrie Jr.	Resident	4727 Gamble St Apt A	LA CA 90032	(626) 327-9541				
SAL VIDAURRI	RESIDENT	3427 LOWELL AVE	LA. CA 90032	(323) 793-1224	Salssons@yahoo.com	YES ✓		
Anjgail Sanchez	HDR.	801 S Grand Ave.	LA 90017	213.239.5807	anjgail.sanchez@hdrinc.com			
Patrick Horton	City of Temple City							
Francisco Garcia	Resident	5438 Templeton	LA 90032	323 356-5630				
Nuria B	Resind	4005 Lowell Ave	90032	323-821-4021	suri curri at yahoo.com	✓		
Benjamin Edinger	Resident	3334 Stockbridge Ave Los Angeles, CA 900	32	(323) 224-6942		NO		
Steven Edinger	Resident	"	90032	"		No		

LA Christian Presbyterian Church, March 29, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

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VICTORIA SANDOVAL		4126 MAYCREST AVE	CA 90032 Los Angel	(323) 343 9064	MAGNIFICAT03@yahoo.com	YES		
Mike Campion	IUOE Local #12	150 E. Carson St.	Pasadena	(626) 792-8900		No		
Stephanie Oslick	consultant	505 S Main St. Ste 900	Orange	(714) 973-4800	oslick@pbworld.com	yes		
Garrett Damrath	CT							
Patrick Garcia								
Julie Leverich		5378 Allan St.	L.A / 90032	—	msjuliemagana@yahoo	yes		
Travis Crain	Resident	3227 Lowell ave	L.A. / 90032	323.225.0025	Travis7165@AOL.com	YES		
Hector CARDENAS		4445 Lowell AVE	LA-90032	322-224 1818	HCARDENAS13@RR.com	YES		
Robert Chaidez	Resident	3701 Lowell Ave.	90032	626 272-1396	rchaidez@aol.com	yes.		
Lee Dolley	Self	111 S. 1st Alh CA 90802	Alh	310 977 7704	ldolley@verizon.net	Yes		
Connie Nenavez	Res.	3300 Farnsworth Ave	90032					
MELISSA DE LA PEÑA	CH2M HILL	1000 WILSHIRE BLVD, 21st FL	90017	213.228.8232	mdelapen@ch2m.com			

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DAVID LUEVANO	LOCAL #, 2			626 792-8900				
Edward Leverich	—	5328 Allan St	90032					
Peter A. Orona		5422 Allan St.	90032					
Robert Garin		186 N Crescent Dr.	90210	619 917 8187		No		
Ruben GUTIERREZ		5520 KENDALL AV.	90032	(323) 225 2778				
TINA GARCIA		4313 GUARDIA AV	90032.	323 447-6464	tinayes@AOL.com	yes.		
PAUL TALBOT	CITY OF MONTEREY PARK	320 W. NEWMARK, MONTEREY PARK	91754	626 307-1247				
Saul Rosas		3507 Pueblo Ave.	90032	(323) 348-7142	SROSAS77@ATT.NE	Yes.		
Francisco León		3331 Edloft Ave LA CA 90032	90032	323 552-3142	fjleon@ucla.edu	yes		
R. Barraz		3011 Stockbridge	90032					

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Richard Tan	—	—	—					
Alfredo Lopez		5375 Peplan Blvd	90032		alopez3347@aol.com			
PATRICIA MORALES		5322 TEMPLETON ST	90032		MORALES_PATRICIA@SBCGLOBAL.NET	YES		
NICHOLAS								
Regina Todd		3533 Sheffield AVE	90032					
Jesse Mosqueda		5461 Allan Street	90032		jessie_mosqueda@yahoo.com	Yes.		
Carleen Ward		3523 Sheffield Ave.	90032		cwardpartylite@hotmail.com	yes.		
Mr José Arranz		3404 Lowell Ave	90032					
Stuart Warren	HMM			626 695 7170	Stuart.warren@hatchmott.com	✓		
Steve Negrete		2737 Budau Ave	90032	323 223 3164				
AL DIAZ		240 HAMPDEN TER	90801					

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Cleavon Govan	Metro	1 gate way plaza	LA, CA 90012	213-922-3044	cleavegovan@yahoo.com	ok		
RAFAEL DEL TORO	RESIDENT	5430 Templeton St.	CA 90032	9174063320	bravinbull@gmail.com	Y		
Mary R. Ruiz	Resident	3917 Stockbridge	CA 90032	(323) 627-0498	Mary.Ruiz@DHCS.CA.GOV	Yes		
GARY PETERSON	PARSONS							
Maria L. Crespo	RESIDENT	4422 MAYCREST AV.	CA. 90032	323 222-9431				
DAN FARKAS	CONSULTANT	Pas.	91106	626-793-8451	dnnfarkas@charter.net	Y		Y
SIRENA PELLAROLO	RESIDENT	5467 SHELLEY St	90032	323-352-8970	SPELLAROLO@ANTIOCH.EDU	Yes		
EDWARD MILLER	ADVANTEE							
EVERARDO GARCIA	RESIDENT	3227 LOWELL AVE	90032	323-225-0025	ENGARCIA@AOL.COM	YES		
Manuel Hernandez	Resident	517 La Paloma Ave	91801	626-284-5754				
Hugo Garcia	El Sereno Organizing Committee							

LA Christian Presbyterian Church, March 29, 2011

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JESUS OMEDA		2959 LOWELL AVE LOS ANGELES, CA	LA, CA 90032	(323) 223 8500		BY MAIL		
TESS LUCKY Tess Lucky		313 S. Coronado alh.	alh.	626 588-2954				
[illegible]								
Rocio Gandara		5461 Allan St	LA 90032		rociogandara@hotmail.com	✓		
LINDA PONCE		5532 TEMPLETON ST	LA 90032	323 227-8932				
Ed Salazar		5532 Templeton St.	LA. 90032	(323) 227-8933				
Tracy Bueno		4344 Winchester Ave. Apt 18	LA 90032	(323) 223-7685	tbueno22@gmail.com	yes		
Guadalupe Bueno		" " "	LA 90032	" "				
MOCTEZUMA ESJARZA		5618 BUCKSHIRE DR	LA 90032	323 223 7719	MOCTEZUMAESJARZA@gmail.com			
Ty Ingalls		3334 Dorchester Ave	LA 90032		Toyford@Prodigy.net	yes		
Leticia RODRIGUEZ		4836 Huntington Dr S.	90032	323 2256263				

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Krisia Magallón	Resident	3412 Dorchester Ave	90032		arhuma75@att.net	Yes		
Nanuata Belliappa	ICF International	811 W 7th St, Los Angeles	90017		nbelliappa@icfi.com	✓		
Gina Figueroa	Resident	2922 Dorchester Ave	90032		geenie323@yahoo	yes		
Helen Díaz Yosso	Resident							
Sedra Lau	Resident		90032			yes		
Liv Johansen	Resident		90032			yes		

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Mark Ng		3533 Chadwick Dr.	Los Angeles 90032	(323)223-5118	markng68@yahoo.com	Yes		
MADONNA MARCELO	ICF INTERNATIONAL	811 W. 7TH ST., STE 800 LOS ANGELES, CA 90017		213-627-5376	mmarcelo@icfi.com	Yes.		
April Figueroa		2922 Dorchester Ave	LA 90032	323 697 2875	april fig@gmail.com	yes		
Peter Rueda		2922 Dorchester Ave	LA 90032	323 222-0757	" "	yes		

LA Christian Presbyterian Church, March 29, 2011

CALTRANS / METRO
SR-710 CONVERSATIONS

PUBLIC SCOPING MEETING

TUESDAY, MARCH 29, 2011
L.A. CHRISTIAN PRESBYTERIAN CHURCH
LOS ANGELES, CALIFORNIA

Los Angeles, California, March 29, 2011
-0-

MS. McCORMICK: Good evening, everyone. Good evening. If you haven't already, if you wouldn't mind taking your seat, we would appreciate it. We'd like to get started.

UNIDENTIFIED SPEAKER: Louder.

MS. McCORMICK: There we go. Okay.

Once again, good evening. My name is Mary McCormick. I am with MBI, and we're going to be facilitating your meeting this evening. We have several pieces of information for you tonight. I hope you all had an opportunity to go to all of the different scoping stations. There are a lot of pieces of information. But we also have some additional information for you through this presentation this evening.

But before we begin, I would like to introduce Joanna Amador who will be one of our translators this evening. We always open our meetings up to people who -- with different languages. So if someone would like something translated, we want to make sure that we accommodate them. So Joanna, would you mind joining me.

(Whereupon the interpreter addressed the audience, but it was not reported.)

MS. McCORMICK: Great. Thank you. We will have both an English and Spanish presentation this evening, so we will work with Joanna and Garrett Damrath from Caltrans who will -- I'm sorry. I've got to speak louder for you. There we go. Do you want to just do -- okay.

Let me introduce our elected officials this evening and the people who we have here this evening. I want to make sure that I acknowledge who we have in our audience. I'd like to introduce Mr. Jorge Marquez from Senator Ed Hernandez's office, and if you could do -- thank you, Jorge, thank you for coming. Arturo Gonzalez who is the district director with Joe Huizar's office. Arturo Chavez, who is the district director for Mr. Cedillo's office, Assemblyman Cedillo's office. And we have Lorisa Bolotsky who is with the City of Los Angeles. Also we have Mr. Paul Talbot with the City of Monterey Park. Good evening. Nicholas Conway with the San Gabriel Valley Council of Governments.

And now we have some folks here from the local organizing committees. We have Mr. Tom Williams with the Los Angeles 32 Neighborhood Council and Mr. Mike Roseberry with the L.A. 32 Neighborhood Council and Mr. Hugo Garcia with the El Sereno Organizing Committee. Okay. Thank you. Thank you all for joining us.

So I have just a couple of little housekeeping things that I wanted to share with you before we get started this evening. When you came in and you signed in, you should have received two pieces of information, two packets of information. And you have first your SR-710 conversation information packet. You'll note in there the "save the dates."

There are four additional meetings. We have this meeting this evening, and we have three additional meetings in scoping. And I will explain that in just a moment. But I wanted to make note that we have added two additional -- we've added two additional meetings: One in La Canada and one in Los Angeles in the Ramona Hall in Highland Park. So I wanted to make sure that you knew about those two.

There is also a calendar in there so that you can actually look back at all of the meetings we have attended or had so far, and one of the other pieces of information that is going to be important for you to know is that there is a piece of information at the very, very back which is a whole page, one page of information. But if you have any information that you would like to get, the whole information is on that particular sheet.

We are in scoping, and I wanted to explain a

little bit about that. In your information packet you will have received a diagram. It looks a little bit like this. We've had 18 meetings. We had six meetings which were to go around to multiple communities to gather information about two particular areas. It was concerns -- I'm sorry -- commonalities and considerations -- concerns and considerations. It's about our commonalities as citizens and how we engage our community, how we look at our -- how we live as citizens, our community, and regions. We went to multiple cities and gathered that information.

We also wanted to go to each one of these cities and talk about their concerns for transportation issues. That was a very important part of our meeting. So the first -- and in addition to that was considerations which were exactly that: Considerations for the future. What is the type of future considerations you would like to see for transportation projects?

So all of that information was gathered, and we put all of this information together on big Post-it notes. But we wanted to make sure that you had access to it. So you cannot only get to it online -- and I'll talk to you a little bit more about the social media -- but we have a station three. You have the highlights of

those conversations, and we actually took photos of every single -- all of the information and all those Post-it notes, and we put them into some notebooks. So you can actually go back there this evening after our presentation and take a look at the El Sereno comments, I think, that might be of interest to you.

Then there was a second piece of information -- that second package of information which was for the second series of meetings which was CEQA and NEPA. That's two that was state, California Environmental Quality Act, and the federal, National Environmental Policy Act. There is a board here that actually shows the side-by-side state and federal environmental process that we have to go through before any project goes forward.

We are now in the third part of that which is called scoping. Kind of a strange word, but scoping does -- is the opportunity where they go out to gather information about how people feel about any particular project and look for opportunities for them to come and make comments about particular projects. When you are in scoping -- tonight is one of our meetings called scoping -- going on the record. That's exactly what you do. You go on the record. The information is provided -- the information that will be provided

tonight actually goes into the legal record.

So I wanted to point out one particular thing for you, if you haven't already seen it. We actually have a public scoping specific area in the back which has three different ways -- actually four different ways -- to gather scoping. You can write on the comment cards, and you should have a comment card in your hand. You can fill those comment cards out. You can put them in the boxes all around the room, or you can go home tonight. If you thought of something, you can write it out, you can actually mail it in, and we'll give you that address online. But it's also on the comment card.

You can go, and we have someone here that can actually help you, and we will type in your comments and make sure that you got exactly what you would like to say and can enter it that way.

And then we have our whole virtual meeting which is very exciting. You can go online and register and put your comments online. This is the first time that Metro has done that. It's really good for people who can't get out of the house, and they can't get to meetings like this. So they actually can go online, register, and make sure that their comments are put on the record. So there is multiple ways to do that.

And then fourthly, I don't know if I've already

mentioned, but we have a court reporter here tonight, so we'll be talking about how your comments will be orally captured as well. So we're really, really going to many lengths to make sure that you have the right and the opportunity to have your comments heard.

So what we'll be doing, we have put together a presentation this evening. It's both in English and in Spanish, and I would like to introduce Garrett Damrath, who is with Caltrans District 7, and he will actually go through the process of scoping this evening and give you a general overview. And then there's a Spanish slide, and then there's an English slide, so we're just going to flip through this for you. But we wanted to ensure that if anyone was here and they needed it in Spanish, we wanted to accommodate that.

So at this time I would like to introduce Garrett Damrath.

MR. DAMRATH: Good evening, and thank you for taking time out of a busy schedule to participate in this scoping meeting. I'm here on behalf of Caltrans and the Federal Highway Administration.

A little brief history before I get into the slide show. The U.S. Council on Environmental Quality defines scoping as an early and open process for identifying important issues related to a proposed

action. When it first started, it was designed to make sure that agencies coordinated with each other to ensure collaboration and minimize conflicting activities, but over the years it's grown into a more public process that involves public input. And this scoping process is really state-of-the-art and so much so that we've actually expanded from six to eight public scoping meetings.

And so scoping is a very flexible process, and it's unique to each project. I wanted to let everyone know that no decisions have been made at this point, and we're here really just to collect your comments.

So why are we here? Previous studies indicate that the SR-710 gap contributes to growing congestion on nearby freeways and arterials. That was a basic -- the premise and the purpose of the 1998 Record of Decision. Later in 2003 that Record of Decision was rescinded, and continued project development was prohibited without further environmental work.

So in November of 2008 Measure R passed with a two-thirds majority of L.A. County voters a ballot initiative that supported a half cent sales tax increase for 30 years to improve transportation throughout the county, including the SR-710 gap. And then the Metro Board adopted motions to move forward with the

environmental phase.

So what we're doing -- scoping for solutions right now. We've convened a series of 20 public meetings and provided an engaging and instructional dialogue and maintained an open and transparent process. We've solicited broad participation and input and facilitated and continued the SR-710 conversations through social electronic platforms.

So the purpose of scoping is to identify issues to be addressed in the environmental documents. The lead agency for this project will be Caltrans for both NEPA and CEQA, and we would respectfully request that all written comments be submitted by April 14th, 2011.

So what is your role in scoping? Like we said, scoping is an early process, and we are looking for the public, federal, state, and local agencies' input. And what we're looking for are potential alternatives, issues, and impacts to be analyzed, and the level of detail in those analyses.

And how do you do that? Well, we would offer you an opportunity tonight to provide oral testimony and written comments, and you can also get on the mailing list for project updates so that you can stay involved in the public process.

This is our project study area. It's vast. It

goes from the 605 in the East to the 5 and the 2 in the West, and is bounded by the 10 in the South and the 210 in the North.

The preliminary project purpose and need is to improve regional mobility and accessibility for the movement of people, goods, and services; reduce circuitous out-of-direction travel on the network; reduce congestion on north-south arterials and local streets currently adversely affected by the diversion of freeway trips; improve regional time -- travel-time savings and thereby reduce loss of productivity associated with congestion; provide additional connectivity in the regional network for use by public transit; improve regional and local mobile source air quality characteristics; reduce greenhouse gas emissions from mobile sources; provide a project that constrains impacts in local communities to acceptable levels; develop a financially feasible project taking into consideration cost effectiveness and variable [sic] funding source strategies including public/private partnerships.

Right now the range of alternatives includes route neutral surface and subsurface highway or freeway; heavy passenger and freight rail improvements; buses and light rail system improvements including the first and

last mile; local street upgrades including signal synchronization and pedestrian and bike access improvements; a traffic management systems alternative; and the no-build alternative.

Some of the new factors that we're considering are multimodal transportation landscape, emerging environmental issues and advances in technologies, potential funding and revenue sources, and project delivery and procurement methods.

Some of the project milestones we're looking at -- public outreach has begun already; the NOI and NOP have been issued; and we are currently in our scoping meetings. Next steps are to complete a Draft Environmental Impact Report/Environmental Impact Statement; hold public hearings; and then prepare a final Environmental Impact Report or Environmental Impact Statement. After that, we would make decisions and have a Record of Decision and a Notice of Determination.

So under CEQA the Environmental Impact Report will be prepared, and under NEPA, an Environmental Impact Statement will be prepared. They're very similar in structure, so they are actually one document.

For project contact for comments and for inclusion in our mailing list, please contact Ron

Kosinski, deputy district director for the division of environmental planning at Caltrans. His address is here on the board, and we have his address in all of the literature that you've received this evening.

I'd like to thank you for your interest in this transportation project and thank you for taking the time out of your day today.

MS. McCORMICK: Thank you, Garrett.

So I wanted to make a note that -- I don't know if you have these, but these are speaker cards. And these speaker cards allow you to come up and to make your comments known and go on the record. And then if you would like, we'd love to have you fill these out.

I have five speaker cards, and this is how we're going to do it. I will call up a speaker, and then I'll mention the name of the second speaker so that person can be prepared to come up. We'd like you to come up to the microphone right by the recorder here so she can actually get it on the record. And you're free to do that even as we're speaking if you'd like to go up and get one or staff can bring you one. If you raise your hand, you can get a copy as well.

So the first person who signed up to do that -- yes, thank you. We'd like to have your name and address. Your address is really important. It's really

important to have your address so that you can make sure that you will go on the record because they need the address to make sure it's legal.

So the first speaker this evening is Mr. Peter Orona. I'd like Peter to come up. And then the second person is Travis Crain. And then we have a -- Chris has a timer. He's put it right here. We'll put the timer -- time to give everybody an opportunity, so we have a two-minute timer here for everybody, and that allows the yellow light will go on when it's about 20 seconds and then 10 seconds around the red light.

Go right ahead.

MR. ORONA: Food for thought. One story suggests city and environment -- 2006 --

THE REPORTER: Your name and address.

MR. ORONA: My name is Peter A. Orona, 5472 Allan Street, Los Angeles, California 90032. One story suggests that the automobile and bus manufacturers in the United States, in concert with tire and oil companies, conspired to remove light rail from the nation's city streets in order to boost automobile and bus sales. Indeed, the case was brought to court in 1949. General Motors and its partner companies were convicted of conspiracy and fined $5,000. Many have argued that this was a grand conspiracy perpetrated by

private business to dismantle public transit. (unintelligible) in 1993 and now 1974.

The proposed 710 tunnel raises serious moral questions about public/private transportation issues. We did not choose to live near a freeway connector road or tunnel. Currently productive residents living within the meridian corridor do so without any conflict technologies adding to our health risk. For children it brings an increased risk of asthma according to researchers at the Kent School of Medicine of the University of -- University of Southern California. It's one of the -- of a host of breathing problems that can plague teens living and learning here in our vast network of freeways. And these problems can follow them throughout life.

With traffic crisscrossing into every corner of Southern Cal, few families in any part of this town are immune to this risk -- L.A. Parent, March 5th, 2011, issue. Freeway pollution and noise increase the risk of developing asthma, cancer, hearing loss, and stress-related diseases. Those of us who live in this neighborhood can only look forward to future filled with illness.

Today there is no 710 surface freeway route -- Valley Boulevard or have a connector road continuing or

710 tunnel. Consequently, the risks emanating from such concepts are zero. To all federal, state, county, and local governments who profess accountability when maintaining modern commercial productivity, it is your duty to find a balance between an individual's right to exist and urbanization. Anything short of this is a travesty to the democratic process and an abatement of our humanity.

As an elected official, it is your responsibility to make sure that our communities are not abused. Our communities are holding you accountable as honorable civil servants -- our communities. We respectfully request the following items be addressed vigorously, competently, and judiciously. Thank you.

MS. McCORMICK: Thank you, Peter.

Travis Crain, and then Mr. Robert Garin.

MR. CRAIN: My name is Travis Crain. I live at 3227 Lowell Avenue, Los Angeles, California. My biggest concern about this corridor is not just the tunnel or the freeway because it goes through our neighborhood. And Los Angeles is littered with the boneyards of neighborhoods where freeways have cut them in two.

And El Sereno -- if you live in El Sereno, we've struggled as a neighborhood, and we are experiencing somewhat of a renaissance now where our

neighborhoods are coming back; our schools are getting better. The Huntington Avenue -- the businesses there are succeeding at a greater rate, I feel. And I think the danger of this cutting our neighborhood in two is much greater than anything that we could possibly do because I think it will be the end of El Sereno as a viable neighborhood. Thank you.

MS. McCORMICK: Thank you, Travis.

Next is Mr. Robert Garin, and then after that, Mr. Paul Talbot.

MR. GARIN: Good evening. My name is Robert Garin. I live at 186 North Crescent Drive, Los Angeles. And I went to the first meeting there in South Pasadena about a month ago -- or maybe it was six weeks ago -- and I heard a lot of concerns about the air quality effects of having a tunnel built in this area.

And I was wondering whether it would be possible to actually capture the exhausts in the tunnel and if Caltrans could study the possibility to treat the exhausts before they are ejected into the atmosphere. That's an opportunity for once to improve the air quality. And I have researched on the Internet and found that in Australia they did that in urban tunnels in neighborhoods. So that's a suggestion for Caltrans to study. Thank you.

MS. McCORMICK: Thank you very much.

Mr. Paul Talbot, and then Mr. Lee Dolley, please.

MR. TALBOT: Paul Talbot, 320 West Newmark, Monterey Park. I'm a former mayor from the City of Alhambra and current city manager for the City of Monterey Park. So for over 20 years I've represented about a hundred and fifty thousand residents in those two communities.

And we strongly support the completion of the 710 freeway and the tunnel solution. And the negative impacts on the communities of Alhambra and Monterey Park have been many, and we've been the brunt of this gap that has dumped the traffic into our community for many, many years.

Both schools -- the schools, the children in schools, have suffered respiratory due to the vehicles getting off the freeway and getting into gridlock. It was earlier mentioned about the arterials -- Fremont, Atlantic, and Garfield -- that are just congested beyond belief due to the traffic that is dumped into our community.

We would recommend that the portals start just north of the 10 freeway interchange and south of Valley Boulevard so that it enters in that phase. And this

project has been over 40 years past due, and our community, which are predominantly minority like this community here, strongly recommends that Caltrans and the Federal Highway do the right thing and fix the gap. Thank you.

MS. McCORMICK: Thank you.

Mr. Lee Dolley, and then Moctesuma Espanza, please.

MR. DOLLEY: Thank you, Mary. You may all know that there have been many studies about tunnels.

THE REPORTER: Your name and address, please.

MR. DOLLEY: Oh, I'm sorry. Lee Dolley, former city attorney of Alhambra, 111 South First Street.

THE REPORTER: Thank you.

MR. DOLLEY: Okay. I'm sorry.

You all may know that there has been studies done about the tunnels, and you may know that there are five different tunnels -- and they're all feasible -- that can be built. I don't know that you all know where the tunnels are that could be built.

So we want you to know that we would like to see option number one which is really here eliminated as one of the tunnels. And we'd like to see four and five which goes eastward towards the 605 also be eliminated. The determinates of the 710 at the 210 is an issue that

we would like to make clear here. If the 210 is going to be reached from the south here, we support 100 percent -- and will fight for along with you folks -- any portal for that tunnel to be south of Valley Boulevard, as far south as it can be. This should be helpful to this community as well.

I just want to say one thing possibly for you all. This environmental study is so darned important, and it's good that you folks are here. And I encourage you to say everything that you can and put it in the record, so it can be studied. We are putting things in the record -- we have already had some things put in the record here. We just really want you to do that. We want this to be the best EIR/EIS ever done. Thanks.

MS. McCORMICK: Thank you.

Moctesuma Espanza and then Tracy Bueno, please.

MR. ESPANZA: My name is Moctesuma Espanza, 5618 Berkshire Drive, El Sereno. I was -- first got involved in the community about 20 years ago when I submitted myself to election as the honorary mayor of El Sereno over the 710 issue at that time, and I'm here again to put on the record that the El Sereno community was ignored, and there was no fairness in the treatment of El Sereno relative to its ability to defend itself as compared to the other communities.

And that's still true. Our community doesn't have the same voice -- doesn't have the same voice as Pasadena or South Pasadena, Monterey Park, or Alhambra. And whatever the process is, that's not going to change. And so whatever is done, this community is likely going to end up in court because we will find the attorney to challenge this.

Now the question that I have is, Why is this being done at all? There is no money for it, and there won't be for 20 or 30 years. The federal government doesn't have it; the state doesn't have it. Why is it still in the budget? Why are engineers still being paid to do this planning when it's not going to happen? This is a continued employment act for Caltrans, and it isn't necessary, and it should be stopped. Thank you very much.

MS. McCORMICK: Thank you.

Tracy Bueno.

MS. BUENO: Hi, it's Tracy Bueno, and I live at 4344 Winchester Avenue, Apartment 18, Los Angeles, California 90032. And in terms of the 710 freeway, I oppose the extension. I think it's a waste of time, a waste of money.

I live in El Sereno pretty much my entire life with my family. My mom is here with me. And we just

oppose the whole entire thing. I think it's a waste of money. I don't know why they keep on bringing this up. It's terrible for the environment. People are going to get sick. It's just a waste of time.

Instead of -- you should take the money and just use it to create jobs. Improve the streets that we have in El Sereno because they look terrible. They look like the ones in Mexico. Trust me; it looks really bad.

When -- for instance, like the Gold Line my father passes through it to go to work, and he says there's hardly anyone who rides that train. There's hardly anything; it's empty. So it's kind of like, why invest so much money? And yet it's not going to be beneficial to anyone. Yeah, it's just -- it's really bad.

Yeah, you should just take it out of the budget. And yeah, it's ridiculous. Like, use it for something good for the community instead of doing something bad. Unless you want -- unless you want for us to stay homeless. Because of when I heard about this, you're going to eliminate my neighborhood, and there was no way it's going to happen at all. We will fight until justice is served, and yeah, just keep up the fight. Thank you.

MS. McCORMICK: Thank you.

Before we continue, I'd like to acknowledge some additional elected officials that have joined us this evening. I'd like to introduce Ronald Palacios with the Los Angeles Unified School District. He's the director of community partnerships. And Mr. Paul Habib, who is with District 14, and he's the public and private transportation director for the district. And then Mr. Patrick Horton who is the planning commissioner for Temple City. Thank you for joining us.

I have three speaker cards left. The first one would be Mr. -- Dr. Clyde Williams, and then behind him is Miss Teresa Lucky.

DR. WILLIAMS: Good evening. Dr. Clyde Williams, 4115 Barrett Road, El Sereno, Northeast L.A. also known as Tom Woods, and L.A. 32 Neighborhood Council.

I've been here for 30 years. Twenty years ago, somewhat like others, we saw 710. We actually, as part of the Chamber of Commerce, held meetings much like this one. However, it was the wrong project, wrong place, wrong time.

Alhambra says, "We have congestion." Okay. Put it in Alhambra. Why put it in Los Angeles? If it's going to benefit Alhambra, hey, put it in Alhambra. We will have alternatives which will take it from south of

Valley Boulevard which is in Alhambra, across to Mission Road which is in Alhambra, not Alhambra Avenue and up Meridian to connect to Main and Huntington Drive, so they can have an interchange there. Surface or viaduct.

Hey, how about the viaduct? Then it will continue on to connect with 110 and 710 stuff. And that will solve all of Alhambra's problems. They won't have any congestion anymore, and the commuters will be able to use Main, Huntington Drive, maybe even Mission, in order to get home.

Oh, but how about the trucks? We forget the trucks. The only way the project will work is with trucks. So the first recommendation is no trucks. Have it all for commuters because we have a commuter congestion problem. Most of us in El Sereno -- we take the 78/79. It works very well. Thank you.

MS. McCORMICK: Thank you.

I would like to ask Teresa Lucky to come on, and then after Teresa would be Alfred Valrie Junior.

MS. LUCKY: My name is Terry Lucky, and I'm a resident of Alhambra. I would just like to see what Mr. Folson (phonetic) said there are some residents in Alhambra that are against the 710 freeway.

MS. McCORMICK: Mr. Valrie. Then after Mr. Valrie is Mr. Hugo Garcia.

MR. VALRIE: Hi, y'all. I'm Alfred Valrie. I live on Ganbier Street behind the middle school.

MS. McCORMICK: Could we have your address, please.

MR. VALRIE: Yes. 4727 Ganbier Street, Apartment 8.

MS. McCORMICK: Thank you.

MR. VALRIE: I live behind the middle school. I've lived here three years. I'm obviously a minority in more ways than one in El Sereno, but I really like living here. I'm gonna -- I'm working on my Spanish, and you all have been very nice to me, so . . . I'm from Detroit originally, so I know a lot about people, just growing up and counting on family and, you know, kind of being around other folks who might have more. And I just appreciate El Sereno.

That being said, I do think that the tunnel is a great idea. I think that what the guy from Alhambra said that the portal starting south of the 10 freeway is -- I think it's a wonderful idea. I think that the connect -- the 710 needs to be connected to the 210. I think that if it ran north by northwest up to where the 2 and the 134 come together, I think that was one of the ideas. I think that would be great. But again, I'm in the minority, but I just wanted get my feelings out

there. Thank you.

MS. McCORMICK: Good. Thank you very much.

Mr. Hugo Garcia, and then following him is Mr. Al Diaz.

MR. GARCIA: My name is Hugo Garcia, and I'm the president of the El Sereno Organizing Committee.

MS. McCORMICK: Could we have your address, please, sir.

MR. GARCIA: 4432 Maycrest Avenue, in El Sereno, L.A., 90032. And I just wanted to say a couple of things.

Moctesuma made some good comments about, you know, the fact that there's been discrimination against our community for decades. We filed a lawsuit over ten years ago because of environmental discrimination in the freeway design, and we continue to have issues with Caltrans and Metro.

I want you guys to know that this week -- and it is really good to see all of you here today -- but in the other meetings that were held, there was about 10 to 15 residents in the community, and we complained, and they finally went and walked the corridor. But we also walked the corridor. We went to every house on the corridor and sent out that yellow flyer that, you know, we brought it and knocked on the doors, whereas Metro

wouldn't do that. They sent out, I think, walking man. You might have seen a white flyer that was with a rubber band. So they still didn't do and engage the community the way they should have. So we took it upon ourselves -- volunteers and members of the El Sereno Organizing Committee -- to engage the community, so that we can get people out here.

And I want you to know that those efforts were made. We also stuffed 4,000 newspapers of The Voice and put an insert. We went to Rose Hill's Church -- Guadalupe Church and put them in the bulletin so people would get them because we continue and it continues to be that way, that the institutions that are supposed to reach out to the community in our community continue to not do that. And the only way that it gets addressed is that we go out there and do it.

So getting back to -- I just wanted for people to know that this has happened. I need to finish. I don't know if my time is up, but I'm not finished.

As far as the tunnel, okay, how can we support a tunnel when the environmental concerns have not been addressed? There needs to be health studies. We need -- there have been studies by USC, but there needs to be El Sereno-specific studies so that we can make intelligent decisions on whether we support a tunnel.

Okay?

What about the toll road? People are talking about a toll road. It sounds kind of like a second class system where some people can afford to use the toll, and other people won't. There are issues of equity involved with that. Also, the El Sereno Organizing Committee, just one last point --

MS. McCORMICK: Okay. Just wrap it up, please.

MR. GARCIA: -- supports the multimodal low-build which is traffic diffusion, creates jobs, synchronization of signals, and a lot of other traffic-calming measures that could be instituted so that, you know, we could do that instead of building a freeway or a tunnel. Thank you.

MS. McCORMICK: Thank you.

Mr. Al Diaz, and then Mr. David Luevano. Please remember your address. Thank you.

MR. DIAZ: Hello, my name is Al Diaz, and I live at 240 Hampton Avenue in Alhambra. I've been hearing about these meetings for years and years and years. I live in Alhambra, and I know the traffic that goes through there. A lot of you people that are from El Sereno don't get the traffic that we get, so that's why you don't want the freeway. But yet you don't want the freeways, but yet you use other freeways to get

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wherever you're going. Now, if everybody would think like this -- we don't want this freeway here, and we did not want all these other freeways -- we would be polluting more out here because there would be more traffic -- stop-and-go traffic, you know.

We're already sending people to the moon and stuff like that, and yet we can't even build a darn four-and-a-half freeway -- -mile freeway when we already have freeways all over the place. I think what has got to be, let's -- I don't know, people might get mad and then about this. Stop being greedy.

Because yet, you don't want the freeway, but we use other freeways. You know, those people had houses. In Pasadena they have houses. The 10, San Gabriel -- like somebody says, they're going to be right there. El Sereno. Hey, City Terrace, Monterey Park, Alhambra, San Gabriel, all those communities up there were divided, and they are still there. Nothing is happening, and people are using these freeways. That's all I got to the say. Just build it.

MS. McCORMICK: Okay. Thank you.

And then David Luevano. Thank you. Is there anyone else -- that's our last speaker card -- so if anyone else would like to speak, please send it up.

MR. LUEVANO: Good evening. My name is Dave

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Luevano. I'm a union representative with Operating Engineers Local 12, and I work out of Pasadena. We are in support of the 710 extension. Also as you all are aware, we are in a recession right now. The one young lady said what they need to do is create more jobs. This is going to create quite a few jobs, hundreds of thousands and thousands of jobs for the community. Not only does it create jobs, but it will also allow a 30 percent hiring rate within each community where the jobs are going to occur. So we are -- we're in favor of this 710. Thank you.

MS. McCORMICK: Thank you very much.

Okay. So I'd like to open it up. We'd just like to see if there are any more speaker cards. Okay. You have one. You have your speaker card. You've spoken.

UNIDENTIFIED SPEAKER: Are you opening up to questions?

MS. McCORMICK: No. I'm just asking if anyone -- if there are any more speaker cards. If anyone else in the room would like to fill out a speaker card, we'd love to have you fill out a speaker card and come up. Okay. Oh, would you like -- did you get one? Martha, can you bring a speaker card up, please? Thank you, Martha. Just a moment. We're going to be taking oral

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comments.

Just to let you know how we're going to be handling questions, we actually have several representatives this evening from Caltrans and Metro environmental, a variety of different folks who are here who will be answering all of the questions at the different scoping stations, and there are six stations. So we want to make sure that we have that open for you. Thank you.

Yes, come on up.

MS. LARSON: Hello, my name is Sadra Larson.

MS. McCORMICK: I'm sorry. Speak in there really loud. Pull the microphone up, please.

MS. LARSON: 5302 Bordland Road, Los Angeles, 90032. And I just want to say this is the first time I heard about these meetings, and this is the first time I have ever received outreach. I live in the University Hills part of El Sereno, so I'm glad I have received this because I didn't have any knowledge of these meetings prior.

I am against the freeway coming into my neighborhood, and I do live in El Sereno, and I hear there's traffic in Alhambra, but there's also traffic in El Sereno. Because I live right off the Valley, so I have the train tracks. I can't get up the freeway; I

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can't get up to Fremont. I have the college traffic, so the same problem exists everywhere, and I understand it, but I just don't want a freeway coming through my neighborhood. Thank you.

MS. McCORMICK: Thank you.

Okay. So I have no more speaker cards, so if there is -- oh, great. Sorry. Thank you. Go ahead.

MR. DEL TORO: I'm Rafael DelToro, 5430 Templeton Street, Los Angeles, California 90032. You know, I hadn't actually planned on speaking at all, but I moved and bought a house on Templeton just recently, not knowing about all this that's going on. So it's kind of a shock.

Yeah, that yellow flyer was the first time that I got any information on it as well. And I have a three-year-old and a four-month-year-old [sic]. And the idea of adding pollution -- or even like I used to live in New York, even the vibration of the trucks going underneath and all that kind of stuff -- it's not really a fun way to live.

And in general, I really enjoy El Sereno the way that it is. It is getting better from just, like, two years ago that I moved here. And you know, I would love for that to progress instead of regress, so I'm against it.

And I -- you know, I know that Alhambra has problems, but this -- this really won't take care of all of those problems. It really won't because the major problem is the trucks and things like that that need to go through. And as far as, you know, start building something, I feel it would be bad. Because to build it -- Alhambra and all the places that have the congestion -- why build it through El Sereno? Thank you.

MS. McCORMICK: Thank you.

Alina Guerra. Alina.

MS. GUERRA: Hi, my name is Alina Guerra, and I live at 3533 Sheffield Avenue, and first of all, I just want to say I am against this 710 freeway. And um, there is, just like, this is ridiculous. You guys should put the money against schools. You guys are cutting out budget cuts from schools and everything. And it should go against school decisions. This is just a waste of money, and you guys are going to destroy everybody's houses that they live in. And this is a good community. So I am against the 710 freeway.

MS. McCORMICK: Any more speaker cards? Okay. Thank you.

So I'd like to give you some pieces of information. Tomorrow night at 6 o'clock at the Lake

Avenue Church in Pasadena, we're going to be having another meeting. And next Tuesday on April 5th from 6:00 to 8:00 we'll be at the La Canada High School. We're going to be in the cafeteria in La Canada. And then on Wednesday we're going to have a meeting at Ramona Hall Community Center at Highland Park. And all of those meetings are from 6:00 p.m. to 8:00 p.m. They are scoping meetings so that you can go on the record.

And you have multiple ways this evening as well. Be sure to remember you have the comment cards in your packet. You can mail them in; you can put them in the boxes. There's a variety of ways to do that.

So what we'd like to do, we'd like to make sure that you have an opportunity if you have any questions. We're going to have the different stations staffed, and we'll have people be there to answer your questions.

I will keep this official meeting open for the next 15 minutes to see if we have anyone who comes in who would like to speak, they may do so. At that time I will officially announce that this meeting and the recording is closed. I wanted to keep it open in case somebody else came in.

So thank you so much for coming this evening. Please take a look at your packet. There are a lot more meetings to go to if you're interested, and then we'll

keep the recording open for the next 15 minutes. So thanks for coming. Good night.

(Pause in the proceeding.)

Thank you all for coming. We're closing our scoping. Thank you.

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 29, 2011

NAME: Lee Dolley

ADDRESS: 100 S Fusto CITY: Alhambra ZIP:

REPRESENTING: 310 977 7704

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

TESTIMONY for the RECORD
SR 710N Gap Closure Project
Scoping Session #5
March 29, 2011

The recently completed SR710 Tunnel Technical Study, October, 2009, used a "route neutral" approach to study the geotechnical feasibility of 5 "zones"; or potential route areas for a tunnel. . We support the deletion of Zones 1, 4 and 5 from further consideration in the Gap Closure EIR/EIS.

Should Zone 3 be selected to build a tunnel the shortest distance from the current terminus of the 710N Freeway to the I-210, we would like to go on record as not only supporting, but insisting that the portal for any tunnel be south of Valley Boulevard.

The EIR/EIS issue identification and analysis must include documentation of the environmental impacts and social and economic hardships that have been suffered by the people of Alhambra and all other local communities, such as El Sereno, due to the710 freeway not having been completed all these years.

These impacts to be analyzed include but are not limited to adverse health and safety impacts due to congestion,noise, abnormal wear and tear on arterials and surface streets due to the 710 through traffic, inequities of bearing the burden of this freeway traffic in local communities while communities along the I 210 enjoy the benefits of a fully constructed freeway east-west system not carrying its intended traffic flow.

Thank you

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 29, 2011

NAME: Carleen Ward

ADDRESS: 3523 Sheffield Ave CITY: Los Angeles ZIP: 90032

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

have all other options other then the freway have been taken into consideration? why does El Sereno have to take the hit if the people in Alhambra want the freeway? If the people in Alhambra are so concerned about congestion why did they build the medium and remove one of the lanes that could have helped with traffic. Also, as a brest cancer survivor, we do not need any polution that would harm the health of Children & community.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 29, 2011

NAME: Peter A. Orona

ADDRESS: 5472 Allan St CITY: LA ZIP: 90032

REPRESENTING: Citizen

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Please see attached 24 Items.
Thank you!

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

Peter A. Orona

5472 Allan St.

Los Angeles, CA 90031

March 27, 2011

SR 710 Conversations/OFFICIAL SCOPING/EIR QUESTIONS/COMMENTS/CONCERNS

ONE GATEWAY PLAZA

LOS ANGELES, CA 90012

The proposed 710 Tunnel raises serious moral questions about public/private transportation issues. We did not choose to live near a freeway, connector road, or tunnel. Currently, productive residents living within the Meridian Corridor do so without any complex technologies adding to our health risks. For children, it brings an increased risk of asthma, according to researchers at the Keck School of Medicine of the University of Southern California. "It's one of a host of breathing problems that can plague teens living and learning near L.A.'s vast network of freeways – and these problems can follow them throughout life. With traffic cris-crossing into every corner of SoCal, few families in any part of town are immune to the risk (LA Parent March 15, 2011 Issue) http://www.reportingonhealth.org/fellowships/projects/air-teenage-lungs-1 ." Freeway pollution and noise increase the risk of developing asthma, cancer, hearing loss, and stress related diseases. Those of us who live in this neighborhood can only look forward to a future filled with illness.

Today there is no 710 Surface Freeway Route, Valley Blvd.-Alhambra Connector Road, or 710 Tunnel; consequently, the risk emanating from such concepts are zero. To all Federal, State, County, and Local governments who profess accountability when maintaining modern commercial productivity, it is your duty to find a balance between an individual's right to

exist, and urbanization. Anything short of this is a travesty to the democratic process, and an abatement of our humanity. As elected officials, it is your responsibility in making sure that our communities are not abused. Our communities are holding you accountable. As honorable civil servants of our communities, we respectfully request the following items be addressed rigorously, competently, and judiciously.

1. What would it take to construct the southern portal between the 60 Frwy (Pomona), and the 10 Frwy (San Bernardino)? Can Freeway Interchanges be reconfigured? If yes, then would it be possible for the southern portal to begin just before the 10 Frwy. Can a tunnel be constructed to go underneath the San Bernardino Frwy?

2. In regards to Electrostatic precipitators (ESP), or Electrostatic air cleaners: What data is there on the effectiveness of ESP/Scrubbers on ambient outside air? Are there a list of contaminants that scrubbers will remove and a list that the scrubbers will not remove? Which companies will be contracted to build the ESP's? Japan uses removal technologies in high-density areas, what is going to be done in El Sereno? What kind of containment tunnel management will be used; "dispersion containment", or removal containment"? How many tons of waste will a "scrubber tower" hold prior to maintenance? Can a "scrubber tower" implode? If a "scrubber tower" fails or is destroyed, is there a back-up system, or replacement procedure in place? Where is the waste from the scrubber pollution going? Can the same, or better "scrubber" technology utilized in nuclear submarines and spacecraft be applied to 710 Tunnel Scrubber Towers? How will 710 Tunnel Environmental Authorities continuously regulate/monitor the atmospheric conditions inside and outside the tunnel region? As scrubber technology improves, can scrubber towers be upgraded?

3. Provide information on studies done to measure simultaneously Particulate Matter contamination emanating at both portals (i.e., same weather/seasons/day/hour). How will the Air Quality Descriptor for PM 2.5 and PM10 be articulated in relation to the 710 Tunnel? Will PM 2.5 and PM 10 particles be eliminated in the process of being scrubbed? What contaminants will be left over and breathed by citizens? Where will the tunnel portals begin? Allen? Concord? Valley Blvd.? Del Mar? How will mitigation measures be addressed at the portal entrances, and tower sites when the technology to control pollution is not proven, or does not exist? How much toxins/noxious gases/CO2/PM2.5/PM10 particles will cars and

trucks release inside the 710 Tunnel per hour? Please provide low and high estimates. Will authorities shut down the tunnel when too many hazardous PM2.5 and PM10 particles are detected on any given day? How much smog will the 710 Tunnel's portals, and scrubber towers contribute to the local existing pollution? For example, how will this new source of smog affect the smog inversions that the communities of La Canada/Flintridge/Tujunga experience? How many tons of air pollution will the proposed scrubbers capture? How often will the proposed scrubbers need to be cleaned? Provide low and high estimates.

4. How would authorities mitigate the noise pollution during the construction of the 710 Tunnel? How will you recapture, and recycle water from any tunnel excavation encounters? Will authorities monitor noise levels, and pollution levels during construction? If levels exceed allowed limits, or the community's concern will they halt work for the day?

5. How will the Valley Blvd.-Alhambra Ave. Connector Road (part of the Low-Multi-Build Alternatives) benefit El Sereno? Compare and contrast the efficiency and effectiveness between the Valley Blvd.-Alhambra Ave. Connector Road, a 710 Surface Freeway Route, and the 710 Tunnel. Provide all information on any and all environmental studies, or reports that have been done and completed near, and around the proposed 710 Tunnel. Indicate what efforts have been made to provide this information to the community of El Sereno. Provide any tangent plans that are being considered in conjunction to the 710 Tunnel in order to mitigate LA County traffic problems. For example, will a commuter train station be constructed in El Sereno between Alhambra Ave., and Valley Blvd.?

6. What formulas/strategies are being used to measure risk acceptability in relation to the 710 Tunnel? Provide all information on how safety, and risk assessments of the proposed 710 Tunnel figure into human and environmental degradation within the affected local communities? How many additional lives will be lost prematurely due to the 710 Tunnel pollution and traffic accidents? What are all the cost-benefit ratios? Is the risk of implementing the 710 Tunnel not greater than the level of pollution output currently used in modes of transportation?

7. Provide a number estimate of traffic that will move from the beginning southern part of the proposed 710 Tunnel to the exit in Pasadena. The number should include projected number of cars, commercial trucks, and other vehicles. Will truck traffic in the tunnel be limited? What will be the

vehicle capacity for the 710 Tunnel? How many cars would be able to fit within the 710 Tunnel during bumper-to-bumper traffic? Approximately, how many trucks will fit inside the 710 Tunnel? What kind of hazardous materials will be allowed to travel through the 710 Tunnel? For example, will commercial trucks be allowed to carry tankers with acids and flammable liquids through the 710 Tunnel?

8. Describe the potential biohazards that both tunnel construction, and usage bring. How is the construction company going to prevent Valley Fever from affecting people when digging, and clearing soil debris? Will there be limited hours of construction? What are the current local industry's hazardous emissions around the proposed 710 Tunnel? How can these materials interact with the new air pollution that the 710 Tunnel will bring? How will they mitigate truck pollution during construction? For example, will pavements be used during tunnel construction to prevent excess dust? Where will all the trucks for hauling out debris be parked? How many trucks will be used to haul away dirt? Where will the excavated dirt be dumped? Again, can the dirt contain Valley Fever materials? Will the train system be used to haul out construction debris? How do authorities intend to mitigate, or address the noise problem caused by the train during the day, and night?

9. How will the 710 Tunnel benefit the community of El Sereno? How many scrubber towers will be located in El Sereno, and what will be their locations? How many Construction staging areas will be located in El Sereno, and what are the locations of the staging areas?

10. How will a fire inside the 710 Tunnel be mitigated? Where there is fire there is smoke. How will untested scrubber towers filter all the hazardous smoke from inside a 710 Tunnel fire? Will the toxic smoke be allowed to escape through the scrubber towers, vents, emergency exits, and portals? Should fire-fighting foam be used to combat fire inside the tunnel? Can powerful fans be used to redirect the smoke above ground? Will there be double jeopardy during a fire? What kind of endangerment will inhabitants above ground face during a catastrophic fire within the 710 Tunnel? Will there be a sprinkler system installed inside the 710 Tunnel in order to mitigate fires?

11. Will homeowners who live directly over/adjacent to the 710 Tunnel have to relinquish their mineral rights?

21. Logistically, would it be possible to evenly spread the amount of freight tonnage along the Pacific Rim harbors (San Diego, Long Beach, San Pedro, San Francisco, and Seattle). What would it take to ensure that a more efficient and effective On Time Delivery System be implemented? Would an upgraded of our national railway system help prevent unnecessary truck traffic through the counties of LA/Riverside/Ventura/ San Bernardino/San Luis Obispo, etc.? For example, can the coordination of freight goods that make their way towards the Midwest, or Northwest be dropped off at any of the northern bays rather than being distributed from the ports of Los Angeles or Long Beach?

22. Are the 710 Tunnel scrubber towers, and emergency exits going to be equidistant from each other? Indicate tower and exit locations. Can tower and exit locations be situated where there are no existing domiciles? If a scrubber tower is warranted in a residential neighborhood, can a four-block radius of green space circumscribe the scrubber tower?

23. How many people concerned about the 710 Tunnel have read ADVICE & PLANNING by Martin H. Krieger?

24. What are the cost benefit ratios for constructing the 710 Tunnel. Include the medical expenses and mortality rates associated with building and usage of a 710 Tunnel.

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 29, 2011

NAME: Maria L. Baez

ADDRESS: 4005 Lowell CITY: L.A ZIP: 90032

REPRESENTING: Resident

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

I don't want the freeway to be expanded.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 29, 2011

NAME: Robert Chaidez

ADDRESS: 3701 Lowell Ave CITY: Los Angeles ZIP: 90032

REPRESENTING: myself and residents.

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

My concerns are to address property valves affecting the area effected by the 710 extention. I would like to know the impact to my property and where/when would the impact occur. My main concern is my properly value will diminish when this happens and this should not be the case.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 29, 2011

NAME: MOCTESUMA ESPARZA

ADDRESS: 5618 BERKSHIRE DR. CITY: LA ZIP: 90032

REPRESENTING: SELF

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

THE INFORMATION PROVIDED DID NOT PRESENT ROUTES FOR THE TUNNELS, NO INFORMATION ON ISSUES RELATING TO EARTHQUAKE RISK. NO INFORMATION PRESENTED ON AIR QUALITY IMPACT ON EL SERENO at EXHAUST POINTS. THE "SCOPING" CONCEPT IS INSUFICENT to get a REAL REACTION to a SPECIFIC ROUTE. EL SERENO SHOULD BE OFF THE ROUTE.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 29, 2011

NAME: Benjamin Edinger (Bean Man)

ADDRESS: 3334 Stockbridge Avenue CITY: Los Angeles ZIP: 90032

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Caltrans should not make a 710 free way. Why? It will release exhaust that may be dangerous. Global warming could increase also. It may als distract people who are going to sleep.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 29, 2011

NAME: Steven Edinger

ADDRESS: 3334 Stockbridge Avenue CITY: Los Angeles ZIP: CA 90032

REPRESENTING: El Sereno

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

I believe that this city, this state, and this country already have enough freeways. The exhaust from a freeway tunnel is not what our neighborhood needs. It would also hurt the local Community Garden.

If you want to build new transportation for the future, build places for trains! I think a lot of people would like a subway tunnel that would link up Alhambra and El Sereno with the Metro Gold Line.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings
“710公路對話”—公眾資訊系列會議

NAME姓名: _____

ADDRESS地址: _____ CITY城市: _____ ZIP郵編: _____

REPRESENTING代表機構: _____

Please drop comments in the Comment Box or:
請將您的意見留在現場留言箱內，或者郵寄至以下地址

Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2 and Series 3 meetings (please print):
請對第一、二期會議中提到的話題留下您的意見（請用正楷書寫）

ask schools for models of -- green design

請注意：對環境評估收集意見將從2011年2月28日起至2011年4月14日結束。在此期間，您的任何意見都將被作為正式文件記錄在案。您在此之前提交的意見將不會被歸入正式文件備案。

Metro

Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY MARCH 29, 2011

NAME: Steve Negrete

ADDRESS: 2737 Budau CITY: L.A ZIP: 90032

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

I have been waiting for the completion of the 710 for years, its about time

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

E-6 – Pasadena

SR-710 Conversations
Public Information and Education Meeting

ELECTED OFFICIALS/REPRESENTATIVES SIGN-IN

Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
Brad Land	LA, C, 5th District	Commissioner				blind@aol.com
Jillianne Hines	Assemblymember Portantino	District Director	215 N. Marengo Ave Suite 115 Pasadena 91101		626 5779944	jillianne.hines@asm.ca.gov
Diego Martin	SGVCOG	Staff	1000 S. Fremont Ave Unit 42 Alhambra 91803		626 457-1800	dmartin@sgvcog.org

Lake Avenue Church, March 30, 2011

SR-710 Conversations
Public Information and Education Meeting

ELECTED OFFICIALS/REPRESENTATIVES SIGN-IN

Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
Betty Tom Chu	City of Monterey Park	Mayor	320 W. Newmark Monterey Park	91754	626-307-1260	

Lake Avenue Church, March 30, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
John Secrest	Lake Avenue Church	393 N. Lake Ave.	Pasadena 91101	626-817-4880	Johnsecrest@lakeave.org	no		
Dali Billy	IUOE Local 12	150 E Corson St	Pas. 91103	626 792-8900		No		
Elena Phleger	Sequoyah School	535 S Pasadena Ave	Pas 91105	626 795-4351	ephleger@sequoyahschool.org	Yes		
ARMANDO RAMOS	RAMOS/CS	2275 HUNTINGTON DR. #444 SAN MARINO, 91108	91108		aramos@ramoscs.com	Y		
JUDITH O'KEEFE		403 WINTHROP RD.	SAN MARINO 91108	626.799.4349	judyo403@msn.com	Yes		
Garrett Damrath	CT							
John Muggridge		201 Santa Monica Boulevard. Santa Monica, CA 91403	91403.					
Kathleen Sanchez	MTA				Sanchezk@metro.net	no		
Dr. Sophie C. Wong	M.P. EDEC							

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
Lydia Compean		636 N. Mentor	Pasadena					
Henry Gonzalez					gonzalzh@mcdfo.net			
NABIL SEJAAN		1820 LOS ROBLES	MARINO SAN		nabil[illegible]@hotmail.com			
Kelly Ewing Toledo	Caltrans	100 S. Main St.	Los Ang.					
Marie Bogacard					cwbogacard@earthlink.net	✓		
LUZ Reyes-Martin	Residen	161 S. Madison Ave Pasadena	91101		luz.reyesmartin@gmail.com	yes		
Lisa Padilla		16 N. Marengo Ave. #412	Pasadena 91101					
NAT READ	710 FWY COALITION	100 E. CORSON ST #200 PASADENA CA 91103			Nat@Nat Read.com	Yes		
RON CARTER	ONE COMMUNITY				TCA@SBCGLOBAL.GM			

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SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
Tsai Yi Chan		160 Arlington Dr.	Pasadena, CA 91105	213-880-0857	tsaiyichan@gmail.com	yes		
Tom Williams	LA32NC	4115 Barrett Rd	LA 90032		ctwilliams@yahoo.com	Y	Y	Y
Barry Gordon	CSULA	1912 Kaweah Dr.	PASADENA 91105	(323) 344-5008	ACTORWG@EARTHLINK.NET	Y		
Bahman Janka	City of Pasadena		91101					
Juan Carlos Velasquez	CH2MHILL	1000 Wilshire Blvd LA CA	90071	213 228 8224	jvelasque@ch2m.com			
Frances Banerjee	Banger Assoc.	2275 Huntington Dr. San Marino	91108	626 308-7500	frances.banerjee@gmail.com	✓		
Lee Dolley	ALL	112 S First Ave	90801	310 4777704	ldolleyJC@verizon.net	✓		
John Lane		11063 Eldora Place	91040		Lanejp@gmail.com	✓		
GARY PETERSON	PARSONS							

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
DAN FARKAS	CONSULTANT	PASADENA	91106	626-793-8473	danfarkas@charter.net	Y		
SAM BURGESS	NO 710 ACTION COMM.	SO. PASADENA			SAMBURGESS@SBCGLOBAL.NET	✓		
Dora BLANCO		634 N. Mentor Pasadena	91106		—			
STUART WARREN	HMM		91006	626 695 7170	Stuart.warren@hatchmott.com	✓		
Lisa Maurath	PB		91001	2138965634	lmaurath@pbworld.com	✓		
ARIEF NAFTALI	ADVANTEC	21700 E. COPLEY Dr. Ste 350, DIAMOND BAR, CA 91765		909860-6222	Ariefnaftali@Advantec-usa.com	✓		
ROBERT W. CHU	NONE	MONTEREY PARK	91754			✓		
Lisa Alvizo	HMM	S Pasadena						
Steve Mar	—	S. Pasadena				✓		

Lake Avenue Church, March 30, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
Aaron Mauricio					amauriciomail@yahoo	✓ yes		
CARLOS CORDON					CARLOSRCORDON@YAHOO.COM			

Lake Avenue Church, March 30, 2011

CALTRANS / METRO

SR-710 CONVERSATIONS

PUBLIC SCOPING MEETING

WEDNESDAY, MARCH 30, 2011

LAKE AVENUE CHURCH,

PASADENA, CALIFORNIA

Pasadena, California, March 30, 2011

-0-

MS. McCORMICK: Good evening, everyone. If you wouldn't mind taking your seats, that would be great. We actually can get started.

Good evening. My name is Mary McCormick. I'm with MBI, and we're going to be facilitating the meeting this evening. I hope you all had a chance to get to the seven stations that we have here. And there's a lot of information for you, so please avail yourself. Even during this time of comments, if you would like to, in fact, go back to the stations, you're more than welcome to do that.

Before we get started this evening, I'd like to say thank you and welcome to some of the elected officials that we have. We have Mr. Brad Land here this evening with the Los Angeles Council 5th District. Brad, thank you for coming. We have Julianne Hines with Assembly member Portantino's office. Thank you. And Diego Martin with the San Gabriel Valley Council of Governments. Thank you. Oh, and then also Betty Tom Chu with the City of Monterey Park. She's just joining us right now. Thank you. Ms. Chu, she is the mayor of Monterey Park. So thank you so much for coming.

We're just getting started, and as I mentioned before, there are several stations in the back. As you came in, for those of you who may or may not have been with us in the past -- we've had several meetings -- you should have received two pieces of information, two packets of information.

One of them was the SR-710 conversations information packet, and I'd like to direct you, if you don't mind, to take a look at the calendar with the "save the dates" in there, and the calendar -- because you have actually two additional meetings. And they are in April.

Next week is our last week. It will culminate 20 meetings in 8 weeks. Next week we have a meeting in La Canada at the high school there at the cafeteria. It will be from 6:00 p.m. to 8:00 p.m., and then we're going to be in Highland Park on Wednesday night, which will be at the Ramona Hall Community Center, and that also is from 6:00 p.m. to 8:00 p.m. Those are also scoping meetings.

I wanted to describe just very briefly to those of you who have not been able to attend in the past, we had a series of meetings that were focused into three specific areas. The first area was for us to go out to the community and gather a lot of information from

people personally about their particular feelings about transportation, transportation issues as a citizen, as working within the community, and then regionally. We had six meetings where we went to six different cities, and we gathered that from a variety of people who attended several of those meetings.

The second series of meetings was a series for CEQA and NEPA. And CEQA and NEPA is the California Environmental Quality Act and the National Environmental Policy Act, and that is a state and federal side-by-side in -- thank you. Speak louder? Sorry. Thank you. Just yell at me. We actually have the second series -- so we had three series. We had series one, series two, and series three, and I'll just repeat series one really quickly again.

The series one was for us to make sure that we actually gathered information from the community, and we wanted to make sure that we heard from people to talk about issues that they have with the commonalities of their communities, the concerns they had for transportation issues, and consideration for the future. Those all were gathered and put into large Post-it notes. We had them all over this particular room.

And what's really important for you to know is that we've actually documented an archive of that. By

being able to go back, you actually can see the actual original Post-it notes. We took pictures of them. We printed them. We three-hole-punched them, and we put them into these three-hole binders by date. So if you have any question about what we gathered, please make sure you get a chance to look at that.

The second series was an environmental education series because a lot of people don't understand that scoping, which we're doing tonight, is a critical part of the environmental process when people are considering a project. So the California Environmental Quality Act and the National Environmental Policy Act is a state and a federal process by law where people are allowed to go on the record and give their comments regarding an environmental process for a project that's being studied.

So that was six meetings, and then we started scoping. And we had six scoping meetings originally scheduled, but we added two additional meetings. And just for your information, typically on an environmental process, typically, you have one scoping meeting. We're going to be having eight scoping meetings. That's why it's important for you to know that we have two additional meetings next week, both in La Canada and in Highland Park, as I mentioned earlier.

So the CEQA and NEPA package that you got should give you a NEPA flow -- process flow chart and a CEQA process flow chart so -- and then frequently asked questions, again it's really critical that people understand what the process is because a lot of folks don't realize that this is an opportunity for you to go on the record. In fact, that's what we're calling the last six meetings -- going on the record. And actually we're in scoping now, and everything that you say tonight actually is recorded.

I don't know if you received this, but I'd really like you to take a look at this (indicating). It is called how to participate. And we're going to talk a little bit more about this later, but I wanted you to see that because we have for you in the packet -- you would have received a comment card. The comment cards are very important because you can actually fill them out today, tonight, and put them in the comment card boxes, or you can take it home. If you think about something tonight that you wanted to say, you can always take it home, and you can write it out, and you can fill out your comments, and you can send it to Mr. Kosinski at Caltrans.

And then we have also provided a computer for those people who may or may not have trouble writing, or

if they would like someone to type up their comments, we actually have a computer here for us to type that up for you.

And then in addition to that, we have the social media station which is back there. And for that -- please tell your friends and family also that if you cannot get to the meetings -- if you're housebound, if you don't drive at night, if there are a variety of things you can't do -- you can go online. If you need assistance to get on online, and you can actually register, and your comments, your spoken comments, through the virtual meeting will be -- you can actually do that and make that a legal record. The really interesting thing about that is that we started the virtual meeting on March 21st. It is a three-week meeting, if you can imagine that, and it actually will go until scoping is completed. And scoping completes on April 14th, so you can actually comment there up until April 14th.

So then tonight we have speaker cards, so if you would like to speak and put your oral comments into the record, please fill out the speaker card. I will process that. As you can see, we have a court reporter here tonight. The court reporter takes down verbatim exactly what your oral comments are. Those oral

comments are entered into the legal record to the environmental document.

So at this time, what I'd like to do is I'd like to introduce Mr. Garrett Damrath. He's with Caltrans District 7, and he's going to present to you -- providing you an overview of scoping this evening. Garrett.

MR. DAMRATH: Thank you, Mary. Welcome. My name is Garrett Damrath, and I do work at Caltrans, and on behalf of Caltrans and the Federal Highway Administration, I'd like to thank you for coming and taking time out of your important day to participate in this important process.

A little bit of history before I get into my slide show about scoping itself -- in 1978 the U.S. Council on Environmental Quality defined scoping as an early process to ensure environmental -- ensure identification of environmental issues on proposed actions. In its inception, it was -- the application of scoping was between agencies to ensure that agencies didn't have conflicting interests, and they were coordinated properly through the environmental process. But since then it has evolved into a more public process with more public interest and input rather than agency input. It's gotten to the point where we've got one

agency meeting, and we have eight public meetings. So you can see how it's evolved into a very dynamic process.

And I wanted to share one of the things that no decisions have been made at this point, and we are here to solicit input from the public tonight.

So why are we here? Previous studies have indicated that SR-710 gap contributed to growing congestion on nearby freeways and arterials. There was a 1998 ROD, Record of Decision, that proposed a surface freeway which was then later rescinded in 2003, and continued project development was prohibited without new environmental work.

In November 2008, Measure R passed, by two-thirds majority of L.A. County voters, a ballot initiative supporting a half-cent sales tax increase for 30 years to improve transportation throughout the county including the SR-710 gap. And then the Metro Board adopted motions to move forward with the environmental phase.

What we're doing now is we are scoping for solutions to address the congestion problem. So we convened a series of 20 public meetings. We have provided an engaging and instructional dialogue and maintained an open and transparent process. We solicit

broad participation and input and facilitate and continue the SR-710 conversations through the social electronic media platforms.

The purpose of scoping is to identify issues to be addressed in the environmental documents. The lead agency for CEQA and NEPA is Caltrans for both the federal and the state laws, and we would like to see written comments submitted by April 14th.

So your role in scoping -- when do we want this? As the Council on Environmental Quality said, it's early in the environmental process. And who are we asking this input from? It is the public, federal, state, and local agencies. And what are we looking for in the scoping process? We want to identify potential alternatives, issues, and impacts to be analyzed and the level of detail in those analyses. And how do you do that? We're asking you to provide oral testimony this evening or by providing written comments, getting on the mailing list for project updates, and getting involved throughout the project development process.

This is a wide view of our present project area. It encompasses about all over the San Gabriel Valley from the 605 in the East, to the 5 and 2 in the West, and then down by the 10 in the South, and the 210 in the North.

The preliminary project purpose and need is to improve regional mobility and accessibility for the movement of people, goods, and services. We'd like to reduce circuitous out-of-direction travel on the network; reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips; improve regional travel-time savings and thereby reduce productivity -- or reduce loss of productivity associated with congestion; provide additional connectivity in the regional network for use by public transit; improve regional and local mobile source air quality characteristics; reduce greenhouse gas emissions from mobile sources; provide a project that constrains impacts in local communities to acceptable levels; develop a financially feasible project taking into consideration cost effectiveness and viable funding strategies including private/public partnerships.

Currently we have a range of alternatives that includes route neutral surface and subsurface highway or freeway; heavy passenger and freight rail improvements; bus and light rail system improvements including the first and last mile; local street upgrades including signal synchronization and pedestrian and bike access improvements; and a traffic management systems

alternative; and the no-build alternative.

Some of the new factors that we're considering in the process are multimodal transportation landscape that exists today; emerging environmental issues and advances in technologies; potential funding and revenue sources; project delivery and procurement methods.

Our project milestones are, first, the initiation of public outreach; our issuance of the Notice of Intent and Notice of Preparation and public scoping meetings. And right now we're at the public scoping meeting. After this we will then draft a -- prepare a Draft Environmental Impact Report/Environmental Impact Statement; hold public hearings and accept comments on that draft; and revise and finalize the Environmental Impact Report and Environmental Impact Statement. And then issue a Record of Decision under NEPA and a Notice of Determination under CEQA.

And as I already mentioned, under CEQA we are preparing an Environmental Impact Report, and under NEPA we are preparing an Environmental Impact Statement.

As Mary had already said, also for inclusion in the mailing list or providing written comments, please mail them to Ron Kosinski, deputy director of the division of environmental planning, Caltrans District 7.

The address is here and also on the information packs and on your comment card.

I would like to thank you again for coming and your interest in this important transportation project. Thank you.

MS. McCORMICK: Thank you, Garrett.

So at this time we're actually going to ask our speakers to come up. Patsy, would you see if you can turn the lights on back up here. Thank you. Just turn some lights on. Thank you.

We're going to -- we want -- everyone is going to get an opportunity to have their equal time, and what we'll have is we have a timer here. I'm going to call up a name, and then I'm actually going to call the second person to come up and speak -- prepare to make comments and I'll make sure that everyone knows who is in line. So I'll -- and our timer will be here. And what we'd like to have you do is just come up here. You'll be right close to the reporter. She's asked to put you there so she can hear you.

And the most important thing tonight is that we need your name and your full address, please. Your address is really key and very important because that's what helps us go on the record. We want to make sure that your records are put into the document. So please

don't forget to put your address down.

So the first person I'd like to call up is Tsai Yi Chan from Pasadena, and Mr. Bradley Land who is second.

MS. CHAN: Hi. First of all, thank you for the opportunity to offer this public statement. My husband and I own a home on Arlington Drive. I'm a design and marketing consultant, and my husband is an engineer. Our home is between Pasadena Avenue and Fair Oaks.

I consider my community to be between Fair Oaks and Orange Grove and also between Columbia and California. We have schools, and we have parks. And Sequoyah Elementary is just a few blocks north of our house, and Mayfield School is about a block west. We also have two parks -- Singer Park and Arlington Garden, which is a beautiful water wide garden maintained by dedicated volunteers.

Cutting through the heart of my community is Pasadena Avenue. It has no sidewalk. It has maybe two trees, and it's also a death trap. Cars streak through at 75 miles per hour, and other cars use my street as a shortcut to or from Fair Oaks. I fear for my neighbors' children when they're playing in their own front yards. Arlington Garden is just three houses away from my house, but I can't safely cross Pasadena Avenue without

looking left and right before I sprint in the split second when no cars are coming.

My husband and I are homeowners. We're taxpayers making a very reasonable request. We want to live in peace, dignity, and safety. We need immediate safe access now in our neighborhood. Give people like me a safe way to cross Pasadena Avenue. Give us sidewalks. Give us trees. Restore and then sell or rent the houses on Pasadena Avenue that makes the street look like a haunted street even in broad daylight.

Thank you again for the opportunity. Oh, and very important. We don't want to forget, for the record, I'm against any form of the 710 gap closure whether it's underground or subsurface or any option. I am for no-build. Thank you.

MS. McCORMICK: Thank you. Oh, yes. Yes, your name, please.

MS. CHAN: Hoi Yee Chan. The address is 160 Arlington Drive, Pasadena, 91105.

MS. McCORMICK: Thank you.

MR. LAND: My name is Brad Land. My address is 100 Hurlbut Street, Number 12, Pasadena, 91105. My address and my neighborhood is very similar to Tsai Yi's, and we're neighbors. And I would describe it from California Boulevard to Columbia, from Fair Oaks to

Orange Grove.

Pasadena Avenue splits my neighborhood east and west, and it is a very challenging and dangerous runway at the current moment with potholes that are breaking some of my neighbor's axles and harming their vehicles because Caltrans doesn't come out and fill the potholes immediately all the time. Sometimes they do.

My hope this evening and through this process are no-build on the 710. As well, I am hoping that we can have crosswalks -- a -- sidewalks with cement instead of asphalt, and then our neighborhood could somehow be made safer by rerouting the traffic off of the south bend of the 710 from the 210 currently, and maybe steering it right out of the city, not shutting down the whole section. So that would be my testimony, and I offer that as a practice.

MS. McCORMICK: Thank you very much.

Our next speaker will be Dr. Clyde Williams, and after him is Mr. Dan Billy.

DR. WILLIAMS: Good evening. Dr. Clyde Williams, 4115 Barrett Road, El Sereno, Northeast L.A., 90032. Also a member of the L.A. 32 Neighborhood Council.

Hey, what are we getting into? Nobody knows. We've got a hundred-square-mile area, and no project.

Transportation -- here are some of the alternatives. One, a freeway, surface freeway, from south of Valley to the 210. Surface freeway. How many houses? Oh, a couple thousand maybe. How long? A long time, but it will be a lot cheaper. Yeah, tunnels. There is actually about 20 different tunnel alignments that we would be proposing, so get ready.

There is also a matter of will they have trucks? And today there was a Webinar online that said, okay, this project will have about a hundred thousand vehicles or passenger car equivalents going each way -- 200,000 each day. The Oakland Bay Bridge has 250,000, so consider what you will be getting into if you go surface route and/or underground.

And why? Trucks. Trucks should be banned because they are going to be a real problem. They will affect us and our community, so we are looking at several different alternatives above ground, on ground, below ground, and connector roads. How about a connector road for the oldest gap in the L.A. area? That is the gap from Arroyo Seco Pasadena Freeway to the 210. Thank you.

MS. McCORMICK: Thank you.

Mr. Dan Billy, and then after Mr. Billy would be Judith O'Keefe.

MR. BILLY: Good evening. My name is Dan Billy. I'm here representing Operating Engineers Local 12 who are located at 150 E. Corson, here in Pasadena right down the street.

I wanted to talk a little bit about things going full circle. You know, a little bit of history. Maybe I'm preaching to the choir. In the '30s we had gridlock here in Los Angeles, we built the 110 Pasadena freeway, and at that time people decided that freeways was a good thing. It opened up -- it got transportation moving, and we developed -- in the '40s they developed a transportation freeway system here, and through the '50s to the '70s, we built it. Since then all these projects that were developed back in the '50s, we've only built about half of them, and the population here has grown since, but our transportation has not. In the process of that we've gone back to gridlock again, which is kind of going full circle back into the '30s.

So I have been fortunate enough to see a few things go full circle in my lifetime. This is just one thing that in our opinion we believe that the tunnel project for the 710 freeway is an answer to a local problem. We've been on -- we've seen the traffic that's been on streets like Valley Boulevard, Fremont Street, Huntington Drive, Fair Oaks, in the morning, in the

evening, and we believe that the tunnel is the way to fix this local problem, and we support the project. Thank you.

MS. McCORMICK: Thank you.

Miss Judith O'Keefe, and then Miss Betty Tom Chu.

MS. O'KEEFE: Yes. Thank you. My name is Judith O'Keefe at 403 Winthrop Road, San Marino, and I live on the corner of Los Robles Avenue, and I speak for quite a few of my neighbors.

I've been a resident of the San Gabriel Valley for 65 years. I know I don't look that old, but I've lived in San Marino since 1969. Just kidding. I wasn't going to tell how old I was. Okay.

Number one, the completion of the 710 freeway will relieve all residents, I believe, and business owners of transient traffic. Therefore, I urge that you close the gap, present existing gap, and allow the 710 to come up and meet the 210.

Secondly, Los Robles Avenue has become inundated with transient traffic. Traffic counts from San Marino Road have grown from 13,000 cars per day to as many as 20,000, and this is a residential street, so we in the Los Robles Neighborhood Association -- we do have an association of residents on Los Robles and San

Marino, and we meet regularly, and we attend the council meetings to ask for help -- so we're now asking you for help because this is where I think we'll find it.

So I can speak for approximately 110 homeowners on Los Robles. We suffer from noise pollution and too many accidents and too many heavy trucks. Although we do have an ordinance that bans trucks over three tons, but they sneak -- they keep coming back. And we would greatly appreciate an EIR study of the streets. And I thank you very much for letting me share.

MS. McCORMICK: Thank you.

Betty, and then after Betty is Mr. Nat Read.

MS. CHU: My name is Betty Tom Chu, mayor of the City of Monterey Park representing over 63,000 residents of the city of Monterey Park.

For more than half a century of Monterey Park, we have had an unenviable front seat to the chaos caused by a 4.5 mile gap in the county safety freeway grid. We suffer a sig alert every day, and when other cities -- and particularly those that oppose the completion of the 710 freeway -- when they talk about not wanting vehicle pollution or traffic by their homes and schools, they are saying loud and clear, leave the congestion next to Monterey Park. After all, Monterey Park is only a city full of immigrant seniors, many immigrant seniors having

come to this country with preexisting respiratory issues.

And children -- many of the children that live there -- when we first -- when my husband worked on the last leg of the 710 freeway, I was just pregnant. Now I am a grandmother of six with none of my children living in Monterey Park nor any of my grandchildren because of that pollution caused by that traffic congestion right there in Monterey Park. And many of the ones that oppose the 710 freeway contribute to that pollution and contribute to the decline of the health of our residents.

The 710 gap closure project is not a transportation exercise or community discussion subject. It is the health and our quality of life. We are just as equal, valuable residents in the county of Los Angeles as those that oppose this project. So the pollution generated by the gap can only exasperate the condition, so we ask that you pay special attention to the pleas of our city and that the health of our community needs to be included and the pollution right there in that Monterey Park needs to be included in those environmental studies. Thank you.

MS. McCORMICK: Thank you.

Mr. Nat Read, and then after Nat is Mr. Lee

Dolley.

MR. READ: Thank you. I'm Nat Read, 100 East Corson Street, Pasadena. I'm chair of the 710 Freeway Coalition. I'm paid to do that, just so there's no confusion about that.

I want to make -- we have held meetings in many different communities. I want to make three points that are unique to Pasadena. One is that of all the communities -- of all the communities there are -- this is the only community in which the citizens voted on their position, their official position. In a special election, it was the citizens who asked that the 710 freeway be continued.

Secondly, this is the most surveyed city of all. Maybe 65 communities have been surveyed by public survey; there is no community or political district that is against the 710, but Pasadena has the uniqueness of having all seven districts surveyed, and among those is the highest support of any community anywhere: Eight to one. In the predominantly minority -- predominantly black Northwest Pasadena where years ago a freeway came through and took out a stable, middle class, minority community on the promise that it connect with the network and make regional transportation easier. When those bulldozers got to another community, they stopped.

And this community in that eight-to-one support is asking for justice. Thank you.

MS. McCORMICK: Thank you.

Mr. John Laue. Excuse me. Oh, I'm sorry. Lee and then John. Thank you. Sorry, Lee.

MR. DOLLEY: Lee Dolley, former city attorney of the City of Alhambra, 111 South First Street in Alhambra. Nat is dead right, absolutely, totally right.

I want to introduce for the record the ordinance voted on by the people of the city of Pasadena a number of years ago -- pledged which is not qualified but which is part of the law. The city -- the citizens here said, about 58 to 41, that they commanded their city to support the completion of the 710. That hasn't changed. May I put this in now or . . .

MS. McCORMICK: Yes, you can do that.

MR. DOLLEY: Second matter, we support a very good, thorough, fair Environmental Impact Report. Everyone here that has a say in this process, get it in. That's how we study it, and that's how we come to fair conclusions. So we're asking everybody to get your comments in, and to be sure that Metro and Caltrans come out with an Environmental Impact Report/Statement that is everything you want and the result of everything you want studied.

Last thing tonight, I put it here -- some of you may not know about. A couple years ago the cities of South Pasadena and La Canada had some lawsuits to stop the freeway from going forward -- to stop this environmental process from going forward. They lost. And I will put it in the record a letter from counsel for Metro which states clearly their points were wrong. I think we've had enough lawsuits. I've seen in my career of this -- lawsuits going back over 20 years. So now let's get it done. Let's go forward.

MS. McCORMICK: Thank you. Also he's going to put together with his comment card.

I have one left. If anyone would like to please fill out a speaker card, happy to take it. So I wanted to invite Mr. John Laue to come up, and if anyone else would like to speak, please fill out a card so you have an opportunity to put your comments on the record. Thank you.

MR. LAUE: My name is John Laue, and I live at 11063 Eldora Place in Sunland in California, and I moved out here to Southern California 20 years ago and had a job with the City of Pasadena as the transit coordinator.

When I first saw this project, I thought, whoa, this is interesting, and here we are again. And it's

obvious after hearing all the speakers, it all depends on your perspective of where you live, what -- how it affects you. I hear the people that live along Pasadena Avenue, I hear the people that live in Monterey Park, and I hear the people that live in Pasadena.

And it really -- it all has to do with where -- how it affects you. And my own vibe is living in Sunland, it doesn't affect me that much, but you can hear when you go to La Canada you're going to hear a lot of people wanting the 710/210 corridor that don't like this project because of increased truck traffic.

I think the problem is that the alternatives we're studying are not -- we are talking about 20th Century solutions, and you know, there -- maybe it's pie in the sky, but I've seen proposals for the San Gabriel River corridor of freight movement. I don't think there is nearly enough emphasis on public transit, light rail that connect -- that can connect different communities along this corridor. I don't think we'll ever see this project built, frankly, because there's too much opposition to it, and it costs too much money.

And I really think that especially with one of the things that has amazed me, after 20 years, is I haven't seen any incremental improvements along Pasadena Avenue or anywhere along there, very simple things could

be done far cheaper, and it seems like there is a conscious effort to make it as bad as possible so that people will get so fed up with it that something will be done. Let's build it.

Well, what are we going do build? And how much is it going to cost? And I really think that we need to look at freight and passenger rail as a major component, whatever you decide to do. This idea of doing more highways is outmoded thinking, and it's never going to happen. Thank you.

MS. McCORMICK: Thank you very much.

So is there anyone else who would like to fill out a speaker card so they can speak tonight? Okay. So this what is we would like to let you know. We're going to keep all of the stations open, and I am not going to close down the comment period. We'll keep it open in case somebody comes in and would like to put comments on the record. So we'll keep it open for another 15 minutes. I will officially at that time -- if we don't hear from anyone, I will officially close the comments for this evening.

But we will have Caltrans and Metro staff at our different stations that if you have any questions, please engage them and ask them, and I'm sure they'll be very happy to help you with any kind of questions that

you might have.

UNIDENTIFIED SPEAKER: Can I fill out a comment or speaker card?

MS. McCORMICK: Pardon?

UNIDENTIFIED SPEAKER: Can I fill out a comment or speaker card?

MS. McCORMICK: Absolutely. We have plenty of cards here, if you'd like to -- we can have them -- if you raise your hand, if you'd like to have a card, and we'll make sure you get one.

This is Mr. Chris Norton. Go ahead, Chris. Give us your name and address, please.

MR. NORTON: Okay. It's Chris Norton. It's 150 East Corson, Pasadena, California 91103.

I'm a union rep, okay, and what I want to say is I don't know how many people here have family members that have been affected by the unemployment rate and the way that people are unemployed. Construction right now is about 30 to 40 percent unemployment rate. We're 1500 people on that out of work at any given day, okay, out of approximately about 15,000 members. Okay?

Right now to stimulate the economy and everything, it would be a very wise idea to invest in this freeway. All the building materials, concrete, any kind of material is the cheapest it's ever going to be,

and everything else. When it comes to construction with big projects like this, speaking as a union rep, one thing that the cities -- you do get -- is people from your community gets to go to work. So the money stays in that community and everything else, okay, because they have local hire policies and everything else.

So also it will help this lady here with the children. I -- you can't believe it or not, I have four grandchildren myself, and I tell you what. I agree with you. It is terrible because I work in this area. It's terrible, and we do take that side street. And we don't go -- when it says 30 miles an hour, we're not going 30 miles an hour. I tell you it's more like we're going 45. And the thing is, I really think this is a plus to build a tunnel for that 710 and finish it.

There was -- I was talking to a couple of gentlemen back there. There was a documentary on, and I want to say it was from -- from France or Paris where they did tunnel. Let me tell you. Oh, time is up.

MS. McCORMICK: You can finish.

MR. NORTON: One thing I want to say, is when they built this tunnel, they built this tunnel, and all the cars and everything and their emissions going in and being sucked up were cleaner than the emissions on the outside before the cars went in. So there's a lot of

pluses for this tunnel for everybody. From all of us, thank you.

MS. McCORMICK: Thank you. Thank you.

And we have one last speaker, Mr. Robert Chu.

MR. CHU: My name is Robert Chu. You heard my wife speak a little while ago. I'm from Monterey Park.

In 1964 I left the project of the 710 at Valley Boulevard. That was the end of the project. And since that time, nothing has happened. I think it's a shame that Caltrans hasn't completed it. It's been a long, long, drawn-out time.

South Pasadena has been one of the most vocal people or community that has been against the project. I think shame on them because they don't care about the rest of the community in the San Gabriel Valley.

I think that it's time that the project is completed one way or the other. Tunneling like this last gentleman has talked about, I have known to be very expensive and probably more expensive than the on-surface project. In 1970 or so I think that all the right-of-ways were already obtained by Caltrans. And nothing has happened. It's time that this project is completed.

The first three speakers that came up here talked about potholes on Pasadena Avenue. That has

nothing to do with the freeway. If the freeway had gone through there, that portion of the street would have been improved, and the city would have had a better view and a better traffic flow to the South Pasadena.

I have nothing more to say. Thank you. I don't believe the project will be finished in my lifetime. I'm 77 years old right now.

MS. McCORMICK: Thank you.

So that completes our speaker cards. One more time, if anyone would like to have a speaker card . . . Okay. Thank you.

I'm going to keep all of the comments and opportunities open for the next 15 minutes. Please make yourself welcome at the other stations. And thank you for coming, and have a nice evening.

(Pause in the proceeding.)

MS. McCORMICK: Thank you so much. We're going to close our comment period right now. Thank you so much for coming.

SR-710 Conversations – A Series of Information Meetings

WEDNESDAY MARCH 30, 2011

NAME: Dr Clyde Williams

ADDRESS: 4115 Barrett Rd CITY: LA CA ZIP: 90037

REPRESENTING: Sierra Club – Transp. Coalte Mbr

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in ~~Series 1, Series 2, and~~ Series 3 meetings (please print):

See Attached – Add to Comments
Provide Webpage for all received
comments immediately

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SCOPING COMMENTS

Project Needs/Purposes/Objectives required for proposal of realistic Alternatives and Mitigation

Lack of project description – no physical project in a 100 sq mi area - created confusion as to what comments involved. Alternatives assessments and analyses must be open to all proposed alternatives and every alternative must include a Truck Ban and Truck Allowed Option and the physical conditions to provide such restriction – e.g., clearances of 12ft vs 16ft.

All needs, purposes, and objectives for the "project" must be formally approved by both Caltrans and MTA and must be quantified and objective. NPOs must be accessible via webpages and must allow for full public commenting. All alternative must be judged numerically against quantified NPOs.

All alternatives must be assessed in public and in writing, recommend webpage for each and must allow for full public commenting on the alternatives and the assessment process.

Ban 4-6-axled trucks from arterials/highways between I-5 (west) and I-605 (east e.g., SR-110)

All alternatives must include separate sets of alternatives which ban large trucks, heavy duty trucks, and trucks with 4-6 axles and such alternatives must include physical conditions which would restrict or prohibit such heavy duty vehicles from use of such roadways (e.g., clearances, grades, lane widths, etc.).

Lead Agencies have provided Conflicting Project Needs/Purposes promoting Public Distrust.

The Agency Scoping session and some Public Scoping sessions (Series 3) included in Purposes and Needs: "**Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including public private partnerships**". During MTA considerations of moving forward with the Scoping, Dir. Katz also included a motion amendment to include financials in the EIR process and was approved by the Board. All EIRs/EISs include elements under SocioEconomic elements in which such can be considered and assessed. The EIR/EIS and Alternatives assessments and analyses must include financial and economic aspects for each alternatives, including: local LACo jobs creation, labor vs equipment ratios, LACo equipment rentals and uses, small/medium contractor uses vs state/national/international financial ratios, etc.

More affluent communities benefit while less prosperous communities are impacted

Some past alternatives which may be considered in the current process have used physical construction in lower income, less affluent communities in order to reduce impacts of congestion, etc. in richer more affluent communities (e.g., surface freeway through Los Angeles in order benefit Alhambra, San Marino, South Pasadena and western Pasadena).

The EIR/EIS must include under SocioEconomic elements the economic and social status of areas which are adversely impacted and those which benefit from congestion reduction and mobility/accessibility enhancements. The EIR/EIS must demonstrate balances of impacts/benefits for each of the benefited/impacted communities (e.g., each neighborhood council within the City of Los Angeles).

Those who benefit should suffer commensurate adverse impacts – "Polluters Pay"

Alhambra Connectors - As the often repeated statements from Alhambra representatives and residents is that they suffer greatly from congestion on Fremont, Valley, and Main, Alhambra should assume the adverse impacts of the improvements required to reduce their congested streets. The project must include the following alternatives:

- Valley to Mission Road Connector – on surface or elevated/viaduct
- Valley to Mission Road to Main Connector – on surface or elevated/viaduct (Via Meridian)
- Valley to Mission Road to Huntington Connector – on surface or elevated/viaduct (Via Meridian, south of Alhambra Road)
- Valley to Main/Huntington to SR110 Connector – on surface or elevated/viaduct

ADD Public Inputs of ALL Meetings to Scoping Record/Report

C.T.Williams 4115 Barrett Rd.
Los Angeles, CA 90032 ctwilliams@yahoo.com

Zone 3-Alhambra – Pasadena I710 Stub Westmont-Meridian-Pasadena Route – Straight line from Hellman/I710 to California/StJohns-Pasadena Ave.

The EIR/EIS must include, as part of mitigation for contained facilities, electrostatic precipitators and associated particulate filtration down to PM0.1 with removal/treatment efficiency sufficient to reduce any tunnel alternatives' emissions to equivalent to surrounding existing air quality without project.

The EIR/EIS must include, as part of mitigation for contained facilities, continuous collection and emissions monitoring systems for intake and discharge "air" with direct communications to SCAQMD and Project webpage.

The EIR/EIS must include, as part of mitigation for contained facilities, electrostatic precipitators and associated particulate filtration down to PM0.1 with removal/treatment efficiency sufficient to reduce any tunnel alternatives' emissions to equivalent to surrounding existing air quality without project.

The EIR/EIS must include a thorough and comprehensive monitoring of existing noise levels at more than 20 different locations for daily, hourly, and instantaneous/peak (10 sec.) noise levels within the project area and similar monitoring wherever modeled traffic would increase by 10% or more.

The EIR/EIS must include, as part of mitigation for contained and open road facilities, noise absorption and reflective measures with treatment efficiency sufficient to reduce any alternatives' generation to equivalent to surrounding existing noise quality without project.

The EIR/EIS must include as separate low-build/multimode-build surface or elevated connector roadway improvements from the existing 710 South Stub to:

a. Mission Road between Westmont Extension and Westminister,
b. "a" and extending up Westminister-Meridian to Concordia-Commonwealth/Fremont
c. Valley to Palm and north across UPRR to Palm thence to Marengo and Huntington Drive

The EIR/EIS must include as separate low-build/multimode-build surface or elevated connector roadway improvements from the existing 710 North Stub to:

a. W.State Str./SR110 via StJohn\Pasadena to Alarcon/Glenarm and over Gold Line ROW,
b. Glenarm/SR110 via Colorado, Green, Delmar, and California (as One-Way Couplets) to Arroyo and Marengo (N-S One-Way Couplet) and extending south to Glenarm.

The EIR/EIS must include thorough, comprehensive traffic modeling for the current and projected transportation facilities with and without the alternatives and with and without trucks

An overall "Goods" Project has been segmented/piecemealed into various roads projects within the Ports of LA and Long Beach, between the Ports and the I-710 South, between I-5 and I-10, along the SR60, along the I-210 North to I-5, along I-5 and extending along SR14, to the High Desert Corridor. In addition, these roads projects are also closely dependent on the railroad projects for the Alameda Corridor (central and East), LOSSAN, SCIG, and ICTF; whatever goes on rail won't go on road. All of these sub-projects are part of the overall Project for Port freight to/from the Los Angeles County inland High Desert Corridor (Logistics Hub) and some improvements for the Inland Empire Logistics Hub.

The Alternatives Analyses must include:

Categorical declarations:

SR710 project shall include trucks or shall ban trucks and
I-5 shall or shall not include truck restrictions/bans once the SR710 project may have been completed for trucks;

A comprehensive listing of all freight projects in the SCAG's area from Port Docks to Logistics centers or interstate rail shipments along with the anticipated flow capacities and volumes;

A thorough assessment of the needs and purposes of the SR710 North Extension project in relationship to the overall freight system throughout the SCAG area and specifically any changes proposed for I-710South, I-210 north of SR134, and SR14 from I-5 to SR138 and beyond;

A thorough assessment of the dependency of the SR710 project upon the I-710South project and the dependency of the High Desert Corridor Project on the SR710 project; and

A comprehensive listing of project and land use development dependencies (including Altadena, LaCrescenta, and Palmdale-Victorville) and assessment of growth inducements and secondary impacts both on the up- and down-stream projects.

Tunnel ventilation concentrates particulate matter. What is their solution to handle pollutants?
The Project Area has relatively clean air in the LA Air Basin although near the worst in the nation. Any proposed increase of air pollutant generation and any concentration of vehicular emission and highway related air pollutant generation must be controlled and reduced to equal or less than the best air quality in the project area, least pollutant levels in the project area, and California AQ requirements whichever the more stringent.

The City of LA passed a resolution against portal construction in Zones 1 & 2. and Zone 3 unless south of Valley Blvd.
The City of Los Angeles has approved a resolution to ban any construction above, under, or on ground surface in Zones 1 and 2 and for any surface construction within the City of Los Angeles north of the south edge of Valley Blvd.
The EIR/EIS must assure compliance with the City's resolution and any alternatives involving a Multi-Lane road system must be routed through the City of Alhambra, reportedly the major beneficiary of the Gap Closure and thereby the primary responsible party for the project.

What is the Need and Purpose of the Extension? To move more trucks?
Trucks must be banned from the SR710 in perpetuity and north of I-10 to the I-210/SR134

SR-710 Conversations – A Series of Information Meetings

WEDNESDAY MARCH 30, 2011

NAME: ROBERT W. CHU

ADDRESS: 645 BARNUM CITY: MONTEREY PK ZIP: 91754

REPRESENTING: SELF

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

WORTHLESS MEETINGS. NOTHING WILL BE DONE!

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

WEDNESDAY MARCH 30, 2011

NAME: Lee Dolley

ADDRESS: 111 S 15 CITY: Alh ZIP: 90802

REPRESENTING: Alhambra

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

1) Pasadena ORD Re in favor of

2) Co of LA Letter Re Suits S Pas/ La Canada 3/25/11

3) Written Comments

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

ORDINANCE NO. 6851

AN UNCODIFIED ORDINANCE OF THE CITY OF PASADENA IN FAVOR OF COMPLETING THE 710 FREEWAY

WHEREAS: It is important that the voters of the City of Pasadena set City policy favoring completion of the 710 Freeway between the I-210 Freeway and the I-10 Freeway. Such a policy is important to the future of the City. With such a policy the City can commit energies and resources to the completion of the 710 Freeway. Such a policy will also communicate to elected officials and staff at the County, State and Federal levels the will of the people of Pasadena to complete the 710 Freeway.

The People of the City of Pasadena ordain as follows:

SECTION 1. The policy of the City of Pasadena favors completion of the 710 Freeway between the I-210 Freeway and the I-10 Freeway.

SECTION 2. This ordinance shall not be repealed or amended except by a vote of the people.

SECTION 3. If passed, this ordinance shall be considered as adopted upon the date that the vote is declared by the legislative body, and shall go into effect 10 days after that date.

I HEREBY CERTIFY that the foregoing ordinance was approved and has become effective as of the following dates:

Date of Election: March 6, 2001
Date of Adoption: March 19, 2001 (date canvass results were presented and accepted by City Council)
Yes Votes: 9,654 (58.3%)
No Votes: 6,908 (41.7%)
Effective Date of Ordinance: March 29, 2001
Published: April 10, 2001

Jane L. Rodriguez
Jane L. Rodriguez, City Clerk

APPROVED AS TO FORM:

Nicholas G. Rodriguez
Assistant City Attorney

COUNTY OF LOS ANGELES

OFFICE OF THE COUNTY COUNSEL

TRANSPORTATION DIVISION

ONE GATEWAY PLAZA

LOS ANGELES, CALIFORNIA 90012-2952

TELEPHONE
(213) 922-2511
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(213) 922-7432
TDD
(213) 633-0901

ANDREA SHERIDAN ORDIN
County Counsel

March 25, 2011

CONFIDENTIAL

THIS MATERIAL IS SUBJECT TO THE ATTORNEY-CLIENT AND/OR THE ATTORNEY WORK PRODUCT PRIVILEGES

TO: BOARD OF DIRECTORS

FROM: CHARLES M. SAFER
Assistant County Counsel
Transportation Division

RE: **City of South Pasadena, et al. v. MTA**

Following the passage of the Measure R Sales Tax Ordinance in 2008, the Cities of South Pasadena and La Canada Flintridge filed a lawsuit seeking to delete funding for the I-710 North Gap Closure Project ("Project") from the Expenditure Plan included in the Measure R Ordinance. The Cities alleged that MTA violated the California Environmental Quality Act (CEQA) by failing to conduct an environmental review for the Project before approving the Measure R Ordinance. This memorandum is to inform your Board that the California Court of Appeal has affirmed a prior trial court ruling that MTA was not required to prepare an environmental impact report (EIR) before including the Project in the Measure R Ordinance.

The Court found that the Project was not sufficiently well defined to constitute a "project" under CEQA. Moreover, the Court concluded that MTA could amend the Expenditure Plan for any purpose, including elimination of the Project. Thus, the Court concluded that inclusion of the Project in the Measure R Ordinance did not render the Ordinance a commitment to a project which under CEQA would have required prior CEQA review. Rather, the Court found the Measure R Ordinance to be a government funding mechanism, statutorily exempt under CEQA from prior environmental review.

Environmental analysis of this Project, and all other Measure R projects, will be conducted as required by CEQA before they are approved by the Board for construction.

CMS:sg

TESTIMONY for the RECORD
SR 710N Gap Closure Project
Scoping Session #6
March 30, 2011

Tonight we bring two very important official documents we request be entered in the record for the EIR/EIS and be used in the analysis:

1. The first is ORDINANCE NO 6851 entitled "AN UNCODIFIED ORDINANCE OF THE CITY OF PASADENA IN FAVOR OF COMPLETING THE 710 FREEWAY", effective March 29, 2001.

   This ordinance states the policy of the City of Pasadena favors completion of the 710 Freeway between the I-210 Freeway and the I-10 Freeway and that it shall not be repealed or amended except by a vote of the people.

   The ordinance further details that there were 9,654 YES votes (58.3%). We request these votes be listed in the final scoping report when numbers are listed about the count for and against a gap closure project and that this ordinance be used when analyzing specific route selection for the final project.

2. The second official document we are entering into the record today is a letter from Charles M. Safer, Office of County Counsel, and County of Los Angeles, dated March 25, 2011. This letter details the final court decision regarding a lawsuit filed by the cities of South Pasadena and LaCanada-Flintridge to remove the 710 Gap Closure Project from the list of voter approved Measure R projects. The lawsuit was denied. The Gap Closure Project may proceed.

We join the people of Pasadena in calling for the environmental clearance and final construction of the Gap Closure with all due speed.

Thank you

E-7 – La Canada

SR-710 Conversations
Public Information and Education Meeting
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ELECTED / APPOINTED OFFICIALS SIGN-IN

Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
Cindy Wilcox	La Cañada Unified School District	Governing Board Member	4490 Cornishon Ave ~~La Cañada, CA 91011~~	La Cañada, CA 91011	(818)952-0345	cwilcox@lcusd.net
Ann Wilson	CITY OF LA CANADA FLINTRIDGE	SENIOR MANAGEMENT ANALYST		LA CANADA FLINTRIDGE		
MICHAEL DAVITT	City of La Canada	Council-Member	5034 Ocean View Blvd. LCF	91011	818-236-3626	Davitt@charter.net.
DAVID A. SPENCE	"	MAYOR	1040 Vista del Valle LCF	91011	818-410-4599	dspence@lcf.ca.gov
Manuel Gouveia	Senator Carol Liu	District Representative	710 S. Central Ave #310	Glendale 91204	(818)409-0400	manuel.gouveia@sen.ca.gov

La Cañada High School, April 5, 2011

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Julianne Hines	Assemblymember Portantino	District Director	215 N. Marengo Ave #115	Pasadena	626 577-9944	julianne.hines@asm.ca.gov
Diego Martin	SGVCOG	Staff	1000 S. Fremont Ave #42	Alhambra	626 457-1800	dmartin@sgvcog.org

La Cañada High School, April 5, 2011

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MEDIA SIGN-IN						
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Carol Cormaci	La Cañada Valley Sun	Managing Editor	727 Foothill Blvd LaCañada	91011	818495-4161	ccormaci@valleysun.net
Ted Ayala	Crescenta Valley Weekly	Writer	3800 La Crescenta ave, La Crescenta		(818) 601-2432	testebanayala@gmail.com
Cheryl aguenos	VALLEY SUN	photog	221 N Brand Blvd. glendale, CA		818) 28 822 400	
Joe Piasecki	Valley Sun	Reporter	727 Foothill Blvd La Canada	91011	818 780 7119	joe.piasecki@latimes.com
Donna Evans	La Canada Patch	editor			818-207-9084	donna.evans@patch.com

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DAVID MAXWELL		PO.BOX 81643 ~~BAKERSFIELD~~	93380 BAKERSFIELD	661-823-1723	TRANSPORTATIONARCHIVES@AS.NET	✓		
* ✓ Zlato Pizzullo		805 Rollin St	91030	3106010603		No		
Tom Williams	LA32 NC	4117 Brownell Rd	LA 90032	323-528-9682	ctywilliams@yahoo.com	Y	Y	Y
Charlie Kaman	LA CANADA	1540 Foothill Blvd	LA CANADA 91011	8187900724	LACANADAUNION@AOL.COM	Y		
Sharon Raghavachary		2209 Maurice Ave	La Crescenta 91214		satysharon@earthlink.net	Y		
* SAM BURGESS	NO 710 ACTION CMT.		SOUTH PASADENA		SAMBURGESS@SBCGLOBAL.NET			
NEAL PETERSON		400 GLENEAGLES	LCF	818-790-3744	petersonnng email.com	NO		
MARTIN, JERRY		4100 DOVER ROAD	91011	818-790-2728	jgjemartin @earthlink.net	Y		
BOB CRIPPEN		4602 DALERIDGE	91011	818-952-6150	BOBCRIPPEN@SBCGLOBAL.NET	Y		
John Marshall		4218 Beresford Way	91011		JWM@INBOX.COM	Y		
✓ BRIAN		1372 PALOMA	91011					

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Randy Strapazon	LCF Trails Council	444 Georgian Rd	91011		Straparzon@yahoo.com	yes		
Sally Balonick	mom	10203 Mt Gleason Ave	91040		TyBalonick@yahoo.com	Yes		
Yaya Chacha	–	Los Angeles.						
Eric Zandvliet	LCF	1327 Foothill Blvd LCF, CA 91011	91011		ezandvliet@lcf.ca.gov	Yes		
Christy Schober		4393 Cornishon Ave. LaCenada	91011		cjschober@yahoo.com	yes		
Gale Caswell	LCF citizen	4604 EL CAMINO CORTO LA CAÑAD	91011		gale.caswell@gmail.com	yes		
Juan Carlos Velasquez	–	1000 wilshire Los Angeles	90017					

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Brad Torgan		927 Kings Rd #220	West Hollywood CA		btorgan@x.netcom.com	Y		
Cindy Wilcox		4408 Union St	La Cañada	818 952-0345	thewilcoxfamily@earthlink.net	Y		
Ann Wilson	City of LCF	1327 Foothill St.	LCF	818-790-8880	awilson@lcf.ca.gov	Y		
~~Mike Davitt~~	~~City of LCF~~	5034 Ocean View Blvd.	CCC	818 236-3626	DAVITT@CHARTER.net	Y		
Cleavon Gouvan	Metro	1 Gateway Plaza	LA, CA 90012 ~~91204~~	213-922-3034	cleavegouvan@yahoo.com	yes		
LAURA VASQUEZ	CITY OF ALH	500 E. PINE ST	91801	626.289.6962	lvasquez@utla.net	YES		
TODD ANDREUS		1939 TULIPTREE LANE	LCF 91011	(818)249-7424	TODDANDREUS@AOL.com	YES		
GARY PETERSON	PARSONS							
CA Moody	PB							
Lyn Messner		4556 Vineta Ave	LCF 91011	818 790 9191	mbomessner@aol.com	yes		
Ernie Messner	LCF resident	" " "	"	"	"	"		

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Harriet Hammons	LCU Methodist Church LCF Chamber resident 40yrs	5404 Rock Castle Dr	LCF 91011	818-399-5738	hhammons@lausd.net	Yes		

La Cañada High School, April 5, 2011

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ANNE HILLS		440 MEADOWVIEW	LCF, 91011		annehills@gmail.com	yes		
Harry LEON		2409 Janet LEE Dr	91214 Lacrescenta		Harry LEONFORCV@earthlink.net	Yes.		
Pat Anderson		2008 Manistee Dr. LCF 91011	91011	818-790 4289	exec@lacanadaflintridge.com	yes		
Laura Olhasid								
Donald Voss		4276 Mesa Vista	91011		dvoss@LCF.ca.gov	Yes (already)		
JAMES STOKER		4555 ENCINAS DR	LCF 91011	818-790-2852	jstoker@ucla.edu	Yes		
Cheryl Davis		4816 Rosemont Avenue	La Crescenta 91214	(818)9700976	cheryle thecvcouncil.com	yes		
KURT FRIEDMANN		5130 HAYMAN Ave	LA CAÑADA 91011	818 952 3458	KFDesign@CHARTER.net	yes		
~~MANUEL GOUVEIA~~								
STUART WARREN	HMM	1409 OAKLAWN RD ARCADIA	CA 91006	626 695 7170	Stuart.warren@hatchmott.com	✓		
TIM ARBENZ		2113 SUNNYBANK DR LA CAÑADA	CA 91011	818 957 8753	arbenz@earthlink.net	✓		

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Tim Myers		resident	91011					
Nat Read	Read Communications							
Odalis Suarez		P.O. Box 477	91046 Verdugo City	8187743208	dyatlew@aol.com	yes		
Floyd Walters	citizen	2103 Boistow Dr. La Cañada 91011		818-209-6211	Floyd@bwamortgage.com	yes		

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Dave Sotero	METRO	Gateway	LA	922-3007	SoteroDe metro.net	NO		
SHERRY STUBBS	CVCA	3200 FAIRESTA ST, #11	91214 LA CRESCENTA	818-957-8563	dansherr@pacbell.net	YES		
Garrett Dancroth	CT							
Harvey Zirler	—	4832 Grand Ave	LCF	626-543-8710		NO		
Mike Horner	—	4818 Fairlawn	LCF	818-790-0238	mhorner4@earthlink	No		
~~Sally~~								

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Barbara Marshall		5309 La Forest DR	La Canada	818 790-1034	barbara@barbaramarshall.com	Yes		
David Gilstrap		1305 Olive Ln	—					
Jerome Berkman		2003 Manistee D	La Canada	818 249 1700	berkmanj@ssc global.net	YES		
Jill Blaisdell		5152 Earl DR.	La Cañada	818 952-5315	ablaisdell@earthlink.net	Yes		

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Lisa Novick	Citizen of La Cañada	1111 Uintah St. La Cañada, CA 91011	La Cañada 91011	(818) 952-4163	lisa.novick@att.net	Yes		
LEW HASTINGS	RESIDENT LA CANADA	4855 GRANADA AVE LA CANADA, CA 91011	LA CANADA 91011	(818) 790-0701	Curlew46@gmail.com	YES		
Waynna Kato		1 2 & 3 See Conversation						
Sally Horner	Residen LCF	4818 Fairlawn Dr	La Canada	790-0258				
Sharon Weisman	Crescenta Valley Community Association	5001 Carolyn Way Glendale, CA	91214		Sharon@Jetcafe.org	yes		
DAN FARKAS	CONSULTANT	PAS	91106	626-793-8457	danfarkas@charter.net	Y		
Trish Kertes	Resident	La Canada	91011	818-621-7775	tkertes@earthlink.net	Y		
Edith Young	resident	La Crescenta	91214					
JERRY REYNOLDS	Self	LA CRESCENTA	91214					
Nora Oliver		La Canada	91011		njo-4e@sbcglobal.net	✓		
RICK FRAZIER	SELF	LCF	91011	818-652-7709				

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SUSAN BOLAN	CRESCENTA VALLEY COMM ASSN	3528 PROSPECT AVE LA CRESCENTA 91214		818-249-6672	sbolan1@aol.com	✓		
JULIA HASTINGS		4855 GRANDVIEW LCF 91011				NO		
JANET ERVIN		801 MERIDIAN	S. PAS.	626/441-7264				
Irena Finkelstein	PB	Sherbrook Dr	Pas					
CLARICE KNAPP		417 EL CENTRO ST	SO PAS	—	HCKNAPP@earthlink.net hcknapp@earthlink.net	—		
ANNE TRYBA		348 Santa Inez Wy	91011		annetryba@sbcglobal.net	✓		
Bill Weisman	City of Glendale	5001 Carolyn Way	91214		bill@weisman.net			
Elise Kalfayan		1555 N. Pacific Ave	Glendale 91202	818 244 5326	ekalfayan@sbcglobal.net	yes		
Joe Kerter	RESIDENT	1101 UINTAH ST	91011	818 790-0354	JKERTES@EARTHLINK.NET	YES		
Wendy Alane Smith		2555 piedmont Ave Montrose, CA 91020		818 2036080	wendyalane1@yahoo.com			
Allen Blaisdell		5152 Earl Dr. La Canada, CA	9011	818 952-2061	ablaisdell@earthlink.net	Yes		

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La Cañada High School, April 5, 2011

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Sab Kim	citizen of LCF	4518 El Camino	91011	818 790 0641				
Leon Mayer		5288 Kirkham Dr	91206	818-790-8418		Yes		
JACK BIERMAN	Citizen/Parent	145 Inverness	91011	818 952-6477				
Kathleen Kulper	citizen	320 Georgian	91011	818 790 2880				

CALTRANS / METRO
SR-710 CONVERSATIONS

PUBLIC SCOPING MEETING

TUESDAY, APRIL 5, 2011
LA CANADA HIGH SCHOOL,
LA CANADA FLINTRIDGE, CALIFORNIA

La Canada Flintridge, California, April 5, 2011

-0-

MS. McCORMICK: Good evening, everyone. Take your seat, if you could. Please take your seats so we could get started, and we will start very shortly. Thank you.

So thanks for joining us this evening. My name is Mary McCormick. I'm the president and CEO of MBI. I will be your facilitator for the meeting this evening. We appreciate your coming out on a busy night and taking your time for joining us this evening. Thank you so much.

We will get started shortly, but before we do, I wanted to remind you that all of the stations that have information at all of the stations will be open for the whole extent of the evening. We'll be open this evening from 6:00 p.m. to 8:00 p.m. So we're hoping that if you have any questions after the presentation this evening, please feel free to go out to the stations, and we will have representatives there who can assist you and answer any questions that you might have.

Before we get started this evening, I'd like to officially recognize several of our elected officials and their staff this evening and several others

associated with the project this evening.

I'd like to introduce Julianne Hines. She's the district director for Assembly member Portantino's office of the 31st District. Julianne, welcome. And Manuel Gouveia with Carol Liu's -- he is the district representative for Senator Carol Liu of the 21st District. So thank you for coming. I'd like to thank David Spence, Mayor of the City of La Canada Flintridge for joining us. And Ann Wilson, who is with the City of La Canada Flintridge, a senior management analyst. And a special thank you to Ann. She was very helpful in helping us get this meeting set up. So we want to say a special thank-you for that this evening. And Laura Olhasso, who is a council member with the City of La Canada, and also Michael Davitt, who is here for the City of La Canada as well -- council member. We have Cindy Wilcox, who is one of the governing board members of the La Canada Unified School District. Thank you for coming. We have Diego Martin with the San Gabriel Valley Council of Governments. Thank you for joining us this evening. And let's see. I think that's it for this evening.

MR. VOSS: Don Voss, City of La Canada Flintridge.

MS. McCORMICK: Oh, you didn't sign in.

MR. VOSS: Actually I did sign in.

MS. McCORMICK: Thank you for joining us.

So this evening we have several pieces of information for you. As I mentioned, the stations are open for you this evening. You should have received two packets of information this evening. One of them is the SR-710 information packet. It's important for you to see that we've been through a lot of meetings, and we wanted to make sure that you understood about the meetings this evening.

And we have -- this is the 19th of our 20 meetings that we have held on this program for the SR-710. And there is another meeting tomorrow evening. If you would like to come to that, you're more than welcome to. And that is in Highland Park in the Ramona Hall Community Center. The information is here: "Save the dates." You'll also find the calendar available for you as well so if you have any questions on that.

You will have received also a comment card. I wanted to make sure that you understand a lot about the multiple ways of receiving your comments. We're in scoping right now. We had 20 meetings, and we had -- the first 12 were prescoping meetings that we actually had a lot of information regarding community input and regarding phases also in CEQA and NEPA as well.

Page 5

You'll find in your packet an exit survey. We would really appreciate it if you would please fill that out for us this evening, and that should give us some information about how we do anything so that we can do better for our upcoming meeting.

And then you should also have received a CEQA and NEPA packet. In the CEQA and NEPA packet, there's two pieces of information. It's a side-by-side environmental process. There are a couple of boards that explain that. So in your information packet you will also receive information on the California Environmental Quality Act and the proper flow charts with that, as well as the National Environmental Policy Act which is the federal environmental policy as well. So there were two sides. There is a lot of information on there and information on the back.

So with that, what I'd like to do this evening is I'd like to introduce Garrett Damrath from Caltrans District 7. He's going to be providing you with an overview and outreach this evening. We're actually in scoping. This is the third part of our series is called scoping, going on the record. And the information actually goes in the environmental document this evening. It actually goes on the record; it becomes part of the legal record. We have a court reporter here

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to actually take down every word that is spoken.

And if you would like to speak this evening, we have speaker cards at the back table. Please fill out your name and your address because your address is very important. If you come up to the microphone and you would like to speak, please give us your name and your address. Your address is very important to make sure that everything is entered into the record, so we really need your address as well.

There will be speaker cards, and after Garrett makes his presentation, we'll actually have an opportunity for anybody here in the audience with the opportunity to speak. You're very welcome to speak. We want to make sure that everyone knows that their voices can be heard this evening.

So with no further ado, I'd like to introduce Garrett Damrath. Thank you.

MR. DAMRATH: Good evening. I'd like to -- on behalf of Caltrans and the Federal Highway Administration, I'd like to thank you for taking time out of your day to participate in this very important scoping meeting.

In 1978 the Council on Environmental Quality defined scoping as an early and open process for identifying important issues related to the proposed

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action. Over time -- in the beginning it was basically an agency-oriented process to ensure collaboration and minimize conflicting activities. But over time it has changed to a much more public process where the public has a lot more to say than the agencies do, and as a demonstration of that, we're having 20 meetings for the public and only one for the agencies.

Scoping is also a very flexible and dynamic process. We had initially started out with 18 meetings, scoping meetings, and we've moved it up to having 20. And I would also like to have everyone know to this point, no decision has been made at this point, and we're here purely as an information gathering for the scoping project.

So why are we here? Previously studies indicated that the SR-710 gap contributes to growing congestion on nearby freeways and arterials. In 1998 there was a Record of Decision that was put out that added surface route freeways to close the gap, and in 2003 that Record of Decision was rescinded, and continued development on the project was prohibited without new environmental work.

In November 2008 Measure R passed, by a two-thirds majority of L.A. County voters, in effect, a ballot initiative supporting a half cent sales tax

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increase for 30 years to improve transportation throughout the county, including the SR-710 gap. And then the Metro Board adopted motions to move forward with the environmental phase.

While scoping for solutions on this project, we've convened a series of 20 public meetings, provided engaging and instructional dialogue, and maintained an open and transparent process. We've solicited broad participation, and we have facilitated continuing SR-710 conversations through social electronic media platforms.

The purpose of scoping is to identify issues to be addressed in the environmental documents. The lead agency for these documents is Caltrans for CEQA, and by being delegated as the federal authority, we are also the lead agency under NEPA. And we would request that all written comments be provided to us by April 14th, 2011.

Your role in scoping -- as I said earlier, the when is now, early in the EIR/EIS process. And the who is, obviously, the public. We are soliciting comments from you and also federal, state, and local agencies. And what we're looking for, we're looking for potential alternatives, issues, impacts -- issues and impacts to be analyzed in the environmental document, and the level of detail in which those analyses should be performed.

And how do you get us these comments? You will be able to provide oral testimony this evening that will go on the record, or you can use one of social media platforms that we have provided, and also you can send us a letter. I will give you the address.

This is the project study area right now. We're looking at the entire San Gabriel Valley bound in the East by the 605, in the West by the 5 and the 2, and the 210 in the North, and the 10 in the South.

Our preliminary project purpose and need is to improve regional mobility and accessibility for the movement of people, goods, and services; reduce circuitous out-of-direction travel on the network; reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips; improve regional travel-time savings and thereby reduce loss of productivity associated with congestion; provide additional connectivity in the regional network for use by public transit; improve regional and local mobile source air quality characteristics; reduce greenhouse gas emissions from mobile sources; provide a project that constrains impacts in local communities to acceptable levels; and develop a financially feasible project taking into consideration cost effectiveness and viable funding

strategies, including public-private partnerships.

Currently our project alternatives consist of a route neutral surface and/or subsurface highway or freeway; heavy passenger and freight rail improvements; bus and light rail system improvements including the first and last mile; local street upgrades including signal synchronization and pedestrian and bike access improvements; a traffic management systems alternative; as well as the no-build alternative.

The new factors to consider are multimodal transportation landscape; emerging environmental issues and advances in technologies; potential funding and revenue sources; and project delivery and procurement methods.

Our project milestones -- so far we have gotten public outreach, and that was the first 12 meetings. We issued a Notice of Intent and Notice of Preparation, and we are holding public scoping meetings right now. Next we would draft an EIR/EIS, and we will hold public hearings on that draft. And then we would finalize the EIR/EIS as a result of the comments we received during the draft circulation. And then issue a Record of Decision and Notice of Determination.

The environmental document type, as I already stated, under the California Environmental Quality Act

would be prepare an Environmental Impact Report. And under the National Environmental Policy Act, we would be preparing an Environmental Impact Statement. The two documents are very similar, so they would actually be in one document, the EIR/EIS.

And for project contact for comments and for inclusion on our mailing list, please send comments to Ron Kosinski, deputy district director, division of environmental planning at Caltrans District 7. And this information is in your information packets.

And once again, I would like to thank you very much for your interest in this transportation project, and we look forward to hearing your comments. Thank you.

MS. McCORMICK: Thank you, Garrett.

I'm going to leave this information up for you because for a couple of reasons provides you with an opportunity to get your comments in in a variety of ways to make sure that your comments are entered into the record called Environmental Impact Report and Environmental Impact statement. And we have the comment cards for you. You can actually write your comments down, and we have boxes around the room for your comments, and we'd like to have you submit those this evening if you can.

And in addition to that, you can actually review it, and you can take it home tonight, and if you think of something that you haven't thought of this evening, you can actually fill it out. And the address is on there, and you can send that to Mr. Kosinski at Caltrans. We also have a computer and if you don't want to write it down, and if you would like someone to type your comments for you, we'd be happy to do that as well. And then with our social media, and with that, you actually can register and go online, and you can go on the record here, and you will have your comments put online, and they go in the record of law as well.

One of the things that you should share with your friends and family is that they can actually, if they have trouble getting out at night, if they have trouble driving in the evening, one of the great things about this particular approach to social media is they can actually go online. They don't have to leave the comfort of their home. They can go online and register and put their comments in and submit them completely through the Internet, so they don't actually have to come to the meeting if they have trouble. So that's important for people to know. And that's going to be open until April 14th, so we opened it on March 21st. It's been kind of a virtual meeting, and everyone can

get online for that too.

So now, what I'd like to do, I'd like to invite people to come up and make comments. Our court reporter will be taking comments, and I just wanted to give you a little information about the crowd rules. We also have a timer. We will be timing. Everybody gets two minutes, and make sure that's available for you here. Please come up to the microphone. The court reporter would like to have that there so she can hear you and make sure she knows what you said and gets your comments down correctly. As I mentioned earlier, please give us your name and your address. It's very important.

So our first speaker this evening is Cindy Wilcox, and the second person behind her is Lisa Novick. So if you wouldn't mind coming up, and then I'll mention the next person. Thank you.

MS. WILCOX: My name is Cindy Wilcox, and I live at 4408 Union Street in La Canada.

I want to thank you all for coming to La Canada to hear our concerns. I'm an elected member of the school board for the La Canada Unified School District. We educate 4,000 children in our schools, and there are also numerous private schools near the 210 freeway. The La Canada School Board has taken a position against this extension of the 710 freeway. We noted that we have

schools and playing fields including this high school and La Canada Elementary School immediately adjacent to the 210 freeway. We are deeply concerned about the health impact on our children.

I urge the environmental study team to document the projected increase of particulate matter on the north side and the outside, and all the hazardous air pollution that affects the children living and going to school near the 210 freeway. In addition, the study needs to acknowledge that freight coming to the port is already in containers, containers that can be loaded and double-stacked on trains. The study must include alternatives, especially railroads, to move freight efficiently and at lowest possible solution cost through the L.A. Basin.

Cities in the Los Angeles Basin spent decades working to improve air quality. Our children and families are depending on you to find alternatives that protect this air quality and our long-term health. Thank you.

MS. McCORMICK: Thank you.

Lisa, and then after her, Mr. Robert Rosenblat.

MS. NOVICK: My name is Lisa Novick. My address is 1111 Uintah Street. That's spelled U-i-n-t-a-h Street in La Canada, California 91011.

Thank you for letting me speak this evening.

I think the proposed tunnel is an outdated, antiquated, inadequate, environmentally harmful, so-called solution for the 710 extension. The freight from the port should be moved by rail completely separate -- completely separate from passenger car roads out to the hub. For example, in Palmdale the tunnel will not relieve congestion on the 710 and will have horrible environmental impacts from adverse health effects from increased particulate matter, adverse health effects that will increase instances of asthma and emphysema, and this will range -- will also extend increased numbers of accidents on the 210 freeway due to the increase in truck traffic if the extension is built.

I demand to know how this increase in gases and particulates will affect the respiratory existences for the old and the young, especially given the fact in La Canada all of the playing fields of schools -- playing fields such as soccer fields -- are within one-quarter mile of the freeway. I also insist on knowing how the noise levels will change, affecting people's sleep patterns and mental health. I want all of these concerns measured against the environmental impacts of the solution that involves the use of rail freight -- railway freight. Thank you.

MS. McCORMICK: Thank you.

MS. NOVICK: Can I add something?

MS. McCORMICK: Yes. Okay.

MS. NOVICK: Don't build the tunnel. Build a rail freight line instead. Do not increase truck traffic on the freeway. Do not build an extension of the 710 freeway. Just because you know how to build a tunnel doesn't mean it's the right solution.

MS. McCORMICK: All right. Mr. Robert Rosenblat, and then Miss Sherry Stubbs.

MR. ROSENBLAT: Hi, Robert Rosenblat. I live on 805 Rollin Street, South Pasadena.

I am also against the tunnel for many reasons. It is the -- environmental is the biggest one. I wanted -- my question here is I wanted to stay away from the corridors of South Pasadena. It's surrounded by L.A. public park and Caltrans empty lot.

I have a hypothetical question: If a tunnel is built and I can't live there because there is either intermittent vibrations of this hundred foot under tunnel or increased background noise or there is a clean air vent next to my house, will the City of L.A. buy my estate's real value? I talked to a land attorney, and he let me know that the City of L.A. is currently broke and there's no chance that it will ever pay for your

appraised estate's value if there is a disagreement on the validity of any of the owners' claims. I want to know what the Caltrans position on this is. That's it.

MS. McCORMICK: Thank you.

Sherry Stubbs, and then after Sherry is Susan Bolan.

MS. STUBBS: Sherry Stubbs, 3200 Fairesta Street, Unit 11, La Crescenta, 91214.

At the March 22nd meeting at Glendale College, I relayed my views on the invalidity of the process for closing the 710 gap. Rather than restating those views again tonight, I incorporate them in this statement by reference.

I believe proceeding with the environmental process is invalid. Metro and Caltrans, however, have allocated $60 million for this purpose. We have repeatedly been told by Doug Failing, executive officer, highways and Metro, that to determine a final cost, various studies and their associated costs need to be done which will all come together at the end. Studies, cost, and $60 million. Therefore, the cost of this series of 20 meetings should be included, and on the record I am requesting that cost including, but not limited to, consultants and public relation contracts and all other contracts, meeting room rent, staff time

and overtime, printing, and supplies.

Also to my knowledge there has been no media or printed news announcements of any of these meetings to the general public. We all got the nightly mails for those that were registered to get them, but nothing that I saw in the paper to the general public, which has not allowed for sufficient participation at many of them where the staff has outnumbered the attendees. That and the fact that I do not believe jamming 20 meetings into two months and one week, with the meetings timed for the dinner hour, satisfies any public outreach requirement and further belies the validity of the process. Thank you.

MS. McCORMICK: Thank you.

Susan Bolan, and then Sharon Raghavachary.

MS. BOLAN: Susan Bolan, 3528 Prospect Avenue, La Crescenta, also known as North Glendale.

Why should we here in the Foothills care about a tunnel that's going to be over in El Sereno, South Pasadena, Pasadena? Why should we care about that? Well, probably the same reason we should care about widening the expansion of the lower 710. Probably the same reason we should worry about the fact that Wilming -- Wilmington Schools are installing air filters on their classrooms, and the same reason that we should

really be is the expected port growth is going to triple by 2030. It's a regional thing. We must look at regional solutions for our regional problems. Right?

The study area -- we haven't been in the study area, but we are totally going to feel the effects of this project. What's going to happen is as things are going to be expanded and extended and the ports are going to continue to take their container traffic and bring it by truck into our neighborhoods, we're going to see increases in pollution and truck traffic of 850 trucks additionally per hour on the 210, and that's definitely going to change the quality of our life and the school children who live and play nearby.

So I tell Metro, please find an alternate solution instead of building this humongous tunnel, four miles, the longest one ever built in the U.S. road tunnel. Thank you.

MS. McCORMICK: Thank you.

Sharon, and then Kurt Friedmann.

MS. RAGHAVACHARY: Hi, my name is Sharon Raghavachary. Tonight I am speaking as a citizen of La Crescenta -- my address is 2209 Maurice Avenue in La Crescenta -- and as a steering committee member for the La Crescenta Community Valley Association.

As the board member for the La Canada School

District stated, they have elementary and high schools that are right on the freeway. We in La Crescenta have two. We have La Crescenta Elementary and Lincoln Elementary right at the 210, and we have La Crescenta High School. My son has asthma as I do, and I'm sure there are many, many other children who go to those schools, and we are also going to see that they also have asthma.

If anyone who's lived in this area since the 210 extension went through, they have noted that we have extremely high increases of truck traffic after this. This is not going to help that situation, and we need to really look at the health detriment to our kids. If you take and move the pollution from one area to another, are you really solving the problem? Thank you.

MS. McCORMICK: Thank you.

Kurt Friedmann, and then Clarice Knapp.

MR. FRIEDMANN: Hello, everybody. Kurt Friedmann. I live at 5130 Hayman Avenue in La Canada.

And my concern is mostly for my three daughters who travel to Pasadena quite often and would be affected by this and other traffic. One of the main things that scared me about the tunnel idea was only a few years ago we had a huge fire on the I-5 in a very short tunnel,

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550 feet. This tunnel as proposed would be 29,000 feet. The firefighters complained that when they got there within minutes, the inferno was so intense that they couldn't go in. They couldn't help anybody. The only people who helped people get out of that tunnel were people who were in there. Ones that were injured were carried out by other people that weren't injured. That's 550 foot, two football lengths, tunnel. This is a 29,000-foot tunnel. I don't think anybody gets out.

Obviously, there's a concern with what kind of inferno would happen if there was an accident in this tunnel, and of course, there's going to be an accident in this tunnel. That was a two-lane tunnel. This is a four-lane tunnel both ways based on the proposal. I would suggest that in the environmental impact report we talk about what kind of elements come out of both ends of that tunnel if there's a huge fire, and what kind of exhaust goes over the neighborhoods on both ends of the tunnel because it's going to happen.

My alternative idea that I'd like them to think about is the Port of Los Angeles and the Port of Long Beach are currently taking in 40 percent of everything that comes from the Eastern Rim, Pacific nations. That's 40 percent of all the stuff that we get for this country from that area. I think we should have the Port

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of Los Angeles and those countries put together a few billion dollars and dig all the way up to Palmdale where we can have a beautiful truck facility that could take just freight off of the conveyor belt basically -- no exhaust, take all the trucks off of Los Angeles highways -- and take them off into the rest of the country. And I think you could get people in Los Angeles to go for that. Thank you.

MS. McCORMICK: Thank you.

Clarice, and then Sally Balonick next.

MS. BALONICK: Hi. My name is Sally Balonick, 10203 Mt. Gleason Avenue, Sunland, 91040.

I was at your March 22nd meeting. When I went home, I Googled the super fund site between Alhambra and South Pasadena. There are six super fund sites. In one of the super fund sites the list of chemicals was just unbelievable. The one I definitely remember was the DDT, which I do believe was outlawed in the early '80s. DDT is directly linked to brain tumors and cancer. It is also an airborne-type chemical. When you inhale it, it absorbs through your body. In San Gabriel there is parts of San Gabriel right now where they cannot use the water to water the plants. They are so contaminated from DDT.

My concern if you build this tunnel -- oh, by

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the way, there is also two landfills that I found between Alhambra and South Pasadena. If you build this tunnel and you disrupt all of the super fund and these landfills and it's out in the air, what is that going to do to us when it is already a known causer -- cancer-causing chemical?

I don't know if anybody has ever gone out to the City of Hope and donated their time and seen all of the little people out there that have cancer. My daughter has for many, many years, and there's nothing more heart-wrenching that when you go out there one year to donate your time and they throw a huge Christmas party for all these beautiful little people, and then you go out the next year expecting to see these children, and they're not there, and they didn't go home, not to their houses.

My daughter is a soccer player. She's played on this field many times. When my daughter plays soccer on this field, I have to hold a handkerchief to my face because of the pollution coming off of the 210 freeway. Thank you.

MS. McCORMICK: Thank you.

Mr. Bill Weisman, and then Jerome Berkman.

MR. BERKMAN: Jerome Berkman, 2003 Manistee Drive, La Canada.

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My concern is that they are going to build a three- to seven-mile tunnel which would be a possible terrorist dream come true. It would require truck inspections the same as the Holland Tunnel in New York and New Jersey and the Lincoln tunnel and all those tunnels like that. There would be significant congestion in order to pull off these inspections. You would have to restrict cell phones. You would have to restrict trucks that carry flammable materials or chemicals.

Additionally, I'd like to bring your attention to the Mont Blanc Tunnel fire where 39 people lost their lives when the truck carrying flour and margarine caught fire in the tunnel. These tunnels are nowhere near as long as what is planned here. I think that with the geniuses we have involved in this process, they can figure out a better way, such as was mentioned here, carrying freight on a rail line and one-way streets that can be done in other cities to supplement the problem. Thank you.

MS. McCORMICK: Thank you.

Mr. Bill Weisman, and then Clarice Knapp, please.

MR. WEISMAN: Thanks. Good evening. My name is Bill Weisman. My address is 5001 Carolyn Way,

Glendale, California.

I'm here tonight representing the City of Glendale. I'm chair of the City of Glendale Transportation and Parking Commission. And I'm here tonight to provide the following input which is, we no longer can afford as a society to be looking at transportation solutions that are automobile-centric. That day has passed.

I grew up in Southern California. I'm familiar with the car culture here and the freedom that that gives to people, and I understand the resistance to giving that up. But back when I first started driving, you could still get gasoline at 19 cents a gallon. And these days we may not see gas come back to town under $4 a gallon.

And so it behooves us as a society to be able to institute a transportation infrastructure that is less dependent on the inefficient automobile and truck and more efficient methods, especially of goods movement which is a big concern with the 710 corridor because it's much more efficient to move the freight on the rail, whether it be fixed rail as we currently have in the Alameda Corridor, or an above-grade elevated system such as the megarail system. It is much, much more efficient to have steel on steel than rubber on asphalt.

It works out better for everyone in terms of the impact of pollution on the communities that live next to this corridor, and it works out better in terms of the traffic that clogs the existing infrastructure.

I want to mention one thing briefly in terms of the EIR and the scoping process. One of the things that rarely gets mentioned is that any proposed tunnel will be a toll tunnel. Any traffic study has to take that into account. $5 toll -- you get one traffic figure. $10 toll -- you get another one. If the EIR does not address the entire possible range of tolls and give traffic figures for each one, it will not be useful information that will help decision makers to decide properly on this. Thank you.

MS. McCORMICK: Thank you.

Clarice, and then Dr. Clyde Williams.

MS. KNAPP: My name is Clarice Knapp. I live at 417 El Centro Street, South Pasadena.

First of all, I believe the City of La Canada needs to demand to include La Canada and Glendale as extensions of this study area. Basically Caltrans and Metro are dividing the project into the lower 710, this gap closure -- they call it gap; we call it home -- and the 210 cities which are not even within the area. There are 33 sensitive receptors in La Canada alone.

And then you also have an open freeway, and the impacts of that pollution on the open freeway are devastating. Check the Coalition for Clean Air fact sheet.

The city and school districts as alone in this fight, and they need to demand a health risk assessment and a health impact assessment, both of those studies, for all the interested receptors. That would include parks, hospitals, athletic fields, convalescent hospitals, senior centers, schools -- public and private -- and day-care centers.

The motor vehicles of other air pollution sources that move account for 90 percent of the cancer residents in the Greater L.A. area. And if you ever were to go to those schools, the schools near freeways, the risk is greater -- the risk of cancer and decreased lung function, your kids are particularly susceptible to childhood air pollution because kids breathe much more quickly than adults. And asthma is the leading cause of school absenteeism, and air pollution has an impact on cardiovascular disease. So aging populations, which we all are, represent a series of public health issues -- the health impacts from diesel pollution that are premature deaths, heart disease, asthma, and bronchitis. They cost $22 billion -- they did -- statewide in 2004, but there is a cost for these breaches of not complying

with the Clean Air Act. Thank you.

MS. McCORMICK: Thank you.

Dr. Clyde Williams, and then Ann Tryba.

DR. WILLIAMS: Dr. Clyde Williams, 4117 Barrett Road, El Sereno, Northeast L.A.

A lot of things. The EIR must include a thorough assessment of all growth-induced effects for the origin and destination areas. That is Port of Long Beach, the Port of Los Angeles, the High Desert corridor, the 210 corridor because if you look at the SCAGS, it includes growth in your area here.

Now, once you have that study -- and that goes out to at least 2035 or beyond -- the EIR must decide the cost of all contract facilities to those who benefit by the origin and the destination areas, that is you become a beneficiary area up here. Your property tax goes up. Welcome to the real world. Around every L.A., Metro, rail, Red Line station, there is a beneficiary assessment district, so beware.

But that's just the beginning. It all treats one common concern and considerations to the official scoping record. Oh, secondary impacts, indirect impacts, growth inducement. What will be the growth inducement in this area -- Altadena, La Crescenta, La Canada? Because with that tunnel for those roads, there

will be growth inducement.
Oh, by the way, $5 a gallon. Hey, take European that is $8 a gallon. The European union right now has forecasted that by the year 2035, they will have all electric vehicles in the cities. By the year 2050 there will be no individual passenger cars. We all have to get together and write the same possibilities. Thank you.
MS. McCORMICK: Thank you.
Anne, and then Sharon Weisman, please.
MS. TRYBA: Hi, Anne Tryba, T-r-y-b-a. I live at 348 Santa Inez Way, La Canada. Excuse me.
I have a very simple request that the scoping document includes a detailed explanation of how the public/private partnership is supposed to function, and I feel that it is a very mentalist and hazy suggestion that has been put out there, and I would like to know what the details, how it could possibly work. Are there any models that are currently in place in California that would explain how this public/private partnership would benefit the taxpayers and not just the private party? I'd also like to know the incoming money from tolls -- how that would offset the taxes that are being used to pay for the tunnel. So that's my comment. Thank you.

MS. McCORMICK: Thank you, Anne.
Sharon, and then Randy Strapazon.
MS. WEISMAN: Hello. My name is Sharon Weisman.
MS. McCORMICK: Okay.
MS. WEISMAN: Okay. I live at 5001 Carolyn Way, 91214. That's Glendale.
I want to thank Caltrans first for modifying the style of these meetings. At least we get a chance to give our input instead of just listening to what you want us to hear.
And I concur with the previous speakers about all the issues they're concerned with. I also wanted to add that the environmental document should consider all of the possible Native American burial sites. And due diligence should be taken to locate any sites and make a good-faith effort to find any descendants to determine how they would wish to proceed with the digging or whatever occurs in this.
And I just -- I want to add that our far north Glendale homeowners group that is the position above Honolulu Avenue in our little eight-block-wide piece of Glendale that's up there in this valley are against the 210 -- the 710 extension in any form -- tunnel or surface. Thank you so much for your time.

MS. McCORMICK: Thank you.
Randy, and then Nat Read.
MS. STRAPAZON: Randy Strapazon, 444 Georgian Road, La Canada.
Taxpayers become frustrated when government agencies don't communicate or cooperate. For example, in the April 3rd article in the L.A. Times discussing the opening of the new Metro link expo line, Rick Thorpe, head of the Authority and in charge of building the expo line, states, and I quote, "Freeways can't take any more. You can't add any more freeways. Freeways have become cost-prohibitive. Rail is the only alternative that we have left," end of quote. And he wrote this for Metro.
Rail is an alternative. We're not alone in saying that. We have a lot of people with a lot of authority, and we have Rick Thorpe who agree that people can't be moved by rail; freight can be moved by rail. We already have the Alameda Corridor, so we're asking you to please cooperate with other government agencies, be creative, and find a solution that fits the 21st Century, not the 19th Century.
And on a personal note, I was in Switzerland when the Mont Blanc fire occurred, and we don't want that to happen in the San Gabriel Valley. It was

horrible. One of the safety features that -- well, in previous meetings they have pointed to that tunnel as a possible viable tunnel. So one of the safety features in that tunnel is a series of blue lights along on the wall. You have to stay a full car length away from the car in front of you, and you use the blue lights as a guideline. Whenever the traffic slows down, you still have to be a car length away from it. That's a safety feature. I can't think of one driver in La Canada, in Southern California, in the United States that would drive home -- or a truck driver that would go to work one car length away. Every single person has to be one car length away. And as a safety feature, unfortunately, it didn't work very well.
But I think what we need to do is work with other entities and realize that building a tunnel which I will never ride in -- I can tell you that, or put my children in -- it's not believable. Thank you.
MS. McCORMICK: Thank you.
Nat Read. Harvey Zirler, next after Nat. Thank you.
MR. READ: My name is Nat Read, 100 East Corson Street in Pasadena. I'm chair of the 710 Freeway Coalition, which is a paid position.
And I'm here to urge a very thorough study on

trucks. Trucks is the major concern in this area. We've heard that again and again. And this study needs to take the trucks from the port and engage and record how many of those -- what percentage of those are going to the freight yard in Commerce? Of those that remain, what percentage are going east along the 60 and the 10? Of those that remain, how many are going to out of the area? And how many are coming to Foothill Boulevard to Vons and Ralphs?

When this project was a surface freeway, that environmental study was done after mass meetings. Trucks were banned when it was a -- when it was a surface freeway, and the trucking industry did not seriously object to that because they said it's a lousy truck route to go up the sides of a triangle rather than take the hypotenuse of the 5. It's six miles farther, and it's a 6 and a half percent grade, the same grade as the Gravevine, but longer.

Is the tunnel different? I would suggest talking to trucking companies so that we're not speculating about what trucks would be here, what we know with the data and with input and also that the impact of those. The pollution should be measured here along -- it should be pollutant type by pollutant type, and it should be based on the technology that is

mandated for the time that the tunnel will be finished. Thank you.

MS. McCORMICK: Thank you.

Harvey, and then Pat Anderson, please.

MR. ZIRLER: My name is Harvey Zirler. I am a resident of La Canada, 4832 Grand Avenue.

I'm going to speak with the eloquence of the people who are participating but are not part of the administration. I thought this was supposed to be a government run for the people, by the people, but I see here Caltrans has already decided what they want to do. They just want to get us as a rubber stamp.

You claim here that you are looking for alternatives which you call this already the SR-710, which means that you already know that what you're going to go do, and you're already going to do it anyway. Because instead of looking for solutions, you're really going to -- looking only -- you're looking for solutions about how to go ahead and doing this project. That's what you're looking for. And you're not looking for solutions to our cause, and I have yet to see one person here -- one person here that stands up for, that advocates, that really wants to see this project going.

And also one more thing, I would like full disclosure of who is that invisible hand that's pushing

this project because we don't understand it. We don't want it. And yet you're going ahead with it and starting already on it. Thank you very much.

MS. McCORMICK: Thank you. Thank you.

Pat. After Pat Anderson is Laura Olhasso.

MS. ANDERSON: Pat Anderson, 2008 Manistee Drive, La Canada Flintridge.

Couple of things I would like to add for the record, and that is in the city of La Canada Flintridge, we have over ten schools that are within 500 feet of the 210 freeway. This is a very dangerous zone for the breathing capacity of our children as well as the adults.

And in addition to that, if you look at the standards today by which a freeway can be built, the 210 freeway would not be allowed to be built because it's traversing through too many schools, and so it's not allowed to be built. Then why would it be okay to put additional traffic on the freeway that couldn't be built today? That's one point.

The other thing is that whatever design you come up with, I would like to see a line item on the budget to include sound walls. Thank you.

MS. McCORMICK: Thank you.

Laura, and then after Laura is Donald Voss.

MS. OLHASSO: I'm Laura Olhasso. I'm the city council member of La Canada Flintridge. You can find me at city hall at 1327 Foothill Boulevard.

I was trained to be Apollo -- Apollo that the city of La Canada Flintridge, the city of Glendale, northern area of La Crescenta, Sunland -- all of those cities that are along the 210 corridor are not included in your study area. And on behalf of our city and all of the cities that are along that corridor, we urge that -- no, we don't urge -- we demand that that study area be expanded to include our communities. It is very emotional.

The traffic study that it appears -- disappeared was done by SCAG, a reputable association, shows that we would have an increase -- an increase of an additional 30,000 vehicles per day on the 210. We would have during peak hours an increase of 850 trucks per hour coming through here. If there is not an environmental impact of that traffic on our cities, I don't know what it is.

And so take it back; take it back to Caltrans; take it back to Metro until they do expand that study area to include those communities as well. Thank you.

MS. McCORMICK: Thank you.

Don, and after Don, Sab Kim. And we have two

more speakers, and then if there's anyone actually that needs a speaker card, let us know.

Begin.

MR. VOSS: Thank you. Donald Voss, also a city council member of La Canada Flintridge, 1327 Foothill Boulevard. Thanks again, Metro, for coming to La Canada Flintridge for this. We appreciate it very much.

In May of last year the Metro Board approved a robust new round of scoping and investigations into, as Metro put it, closing the 710 gap. That's not how we term it in La Canada Flintridge, as you have heard. The key word that was used over and over again was "robust," and that's the word I want to use today as well. Robust in the sense of, number one, how much is the darn thing supposed to cost? What is the cost benefit analysis? There is no identified cost benefit analysis. I know of no industry in the world that would pursue a project of this nature without a cost benefit analysis having been done first.

Robust scoping -- we have a pretty good outline of the alternatives, but I would expect the same intensity on each of those alternatives as will be spent on examining the possibility of a tunnel.

My colleague, Miss Olhasso, has already talked about the study area, but without including La Canada

Flintridge, La Crescenta, up the 210 freeway north of Glendale into the study, this scoping project is dead on arrival.

Gases -- greenhouse gases being reduced is part of the project or one of the goals of the project, and we certainly support that. But this tunnel idea will not reduce diesel particulates, the most lethal component of traffic pollution today. Bringing diesel particulates to La Canada Flintridge to pollute the lungs of children, who are our children who attend schools within 500 feet of the freeway -- that's not a trade-off in any way, shape, or form.

We have to question this process without a reliable cost, and we have to question this process without a reliable cost benefit analysis. Thank you.

MS. McCORMICK: Thank you.

Our next speaker is Sab Kim, and then Gale Caswell.

MR. KIM: My name is Sab Kim. I'm at 4518 El Camino Corto Street, La Canada.

So my speech is about Metro's environmental study, especially on the noise levels by trucks. So I live about a third of a mile from the freeway to the north on the hillside, and it's -- the noise is loud, at times very loud. The concern of mine is a good distance

from the freeway, but just because I'm on a hillside, I receive a lot of noise. And sometimes I can count individual trucks. But our Councilwoman told us that after the completion of this tunnel, there will be 850 trucks per minute -- per hour. I'm not sure whether I can count 850.

I tried to emphasize that this is not only my problem. Even if I go a half a mile from the freeway, I still hear the same level of noise just because it's on the hillside. So from my subjective counting, more than 500 houses -- homes will be affected by the noise.

And let me -- I do not want my small kids playing in the backyard full of noise, so my demand is that comprehensive study of the noise level. I emphasize comprehensive. For example, take the noise measurements every three hours throughout the year -- throughout the year because I experience that the noise level changes depending on the thickness of the air and the stability of the air. And if you would like good locations, I can even offer my roof. Thank you.

MS. McCORMICK: Thank you.

Gale, and then (unintelligible).

MS. CASWELL: My name is Gale Caswell, at 4604 El Camino Corto, La Canada, 91011.

First I want to object to the use of the term

"gap." I don't know when that was inserted into this process. It's been a while since I came to a meeting, but that's semantically weighted in a way that, I think, is unfortunate. The gap needs to be filled, and I personally don't think that this is a gap at all.

Second, I wanted to say that we've experienced, because we live near Foothill, the aftermath of any accident that occurs on the 210. I have had people try to get to my house, which is just above Foothill, and be delayed a half hour coming from Angelus Crest to El Camino Corto because everyone is pouring off the 210 onto our one conduit which is Foothill, and it becomes hideously impassive.

My final point is building a freeway is not the answer. People have talked about greener ways of living, and we only look at that; we only get serious about it. But in my opinion we could crisscross every inch of Southern California with freeways, leaving no room for homes, and we have gridlock on those freeways eventually. Because if you build freeways, people will want to drive cars on them. We have to find new solutions, and we have to stop this project where it is. I am so sorry that $60 million has to be spent just to make this decision. Thank you.

MS. McCORMICK: Thank you.

And Mr. Mayer is our last speaker. If anyone else would like to fill out a card, please do so. Let me know if you need one.

MR. MAYER: Thank you. My name is Leon Mayer. I'm from Glendale.

I was at the city council meeting tonight at Glendale. I go there every Tuesday because I have a friends of the library project that I have done for ten years. But that's not why I'm here. We've heard that airing the chariot from the beginning has been against this project, and I'm curious as to how many people here are in favor of the project?

UNIDENTIFIED SPEAKER: Nat Read.

MR. MAYER: Nat -- I know Nat. Everybody is entitled to their opinion and their feeling and their convictions, but is their any representative of Mr. Kosinski's office here tonight to listen to us?

MS. McCORMICK: Yes.

MR. MAYER: Are you?

MS. McCORMICK: No. Mr. Garrett Damrath who made the remarks is over here at the table.

MR. MAYER: Well, the question I have is the comment made by Miss Raghavachary about the fact that the legislative analysts of the State of California, the Assembly or the Congress -- not the Congress, the

Senate -- the legislative assent -- the analyst has raised a serious question about the legality and the viability of the funding for this project. Has anybody heard about that yet? Somebody did.

Well, I suggest that somebody on behalf of Kosinski's office should address that question -- ready to address that because that's very important.

And I'm against this project for a lot of reasons that I'm not -- but they've all been spoken about already tonight. But I think it's important that the PPP legislative analyst who has made a serious claim as to the legality and feasibility of this program, that that should be discussed, not just by us but by those who are proposing to have this project go through. Thank you.

MS. McCORMICK: Thank you very much.

Thank you. Your name.

MR. ANDREWS: Hi, I'm Todd Andrews, and I am a resident here in La Canada at 1939 Tulip Tree Lane.

I really hadn't planned on speaking on tonight, so I apologize. I haven't prepared my comments, but some of my fellow citizens here have triggered a few thoughts. One of which I really find this hard to believe that Caltrans and the other agencies would be able to conduct a full study without really

understanding how the infrastructure would be used once it's constructed.

I'm a fairly informed guy. But sitting here tonight I was surprised exactly how long that tunnel is going to be. I think if people sat down in focus groups and fully understood what a five-mile tunnel would do and then they study what would the actual usage of the tunnel be, I think you'd find out that there would be very few people that would actually use their own personal automobile on that conduit. I personally would not drive five miles in a tunnel. I hate the Holland Tunnel. I hate every tunnel in New York. I wouldn't drive in one here.

So if the cars aren't going to use it to really make it really a vehicle for trucks which is largely the impact we talked about tonight. So if it's for the trucks, why aren't we building something for the trucks instead of wasting money on something that will not get used?

I'd also like to pick up on a -- there's a lot of comments on the corridor through the Crescenta Valley not being included in the impact study. I think that -- I'm usually not a conspiracy theorist, but I think it's been excluded for two reasons. One is because the actual environmental impacts would be greater through

this corridor because we are in a very concentrated valley. And by the way, every environmental impact also has an economic impact. And by the way, this is a pretty huge economic community as we go through this beautiful valley.

I see my time is up. Thank you.

MS. McCORMICK: Thank you. Thank you.

We want to make sure everyone has an opportunity to speak this evening. So we've gone through several speaker cards. Is there anyone else that would like to speak tonight? If you do, so please fill out a speaker card, and we'll be happy to -- okay.

Finally, have the staff bring up speaker cards, please. Okay. So we have one more lady who would like to join us. Anyone else? Oh, this gentleman right here, yes. So there are two more.

MS. KERTES: Trish Kertes, hello. I live at 1101 Uintah Street, U-i-n-t-a-h Street, La Canada.

I'm looking at the people who are here. And this is a very, very small percentage of people who live here in La Canada and the La Crescenta Valley in general. I think we need to organize. We are up against a very large organization with a lot of money behind them, and we have resources.

I've been on a few committees throughout the

1 years where we stopped a big-box kind of development,
2 Angelus Crest, and we won. So I'm not sure we got
3 exactly what we wanted, but I think we can organize, and
4 I think we need to each talk to people, talk to our
5 neighbors, have petitions. We have to get out there and
6 let people know what's going on here. Otherwise we're
7 going to be thrown through the tunnel. And I think that
8 would really be unfortunate.
9 We have so much at stake here. So talk to your
10 neighbors. Maybe we can form committees, and get this
11 thing going. Thank you.
12 MS. McCORMICK: Thank you.
13 And Carlos -- Carlos Cordon.
14 MR. CORDON: Thanks. I'm really looking
15 forward to speaking here tonight, and I think I attended
16 the last meeting which took place in Pasadena. I think
17 I got there just a bit late, and I really didn't get a
18 chance to speak on one of the things that's been
19 concerning me with regards to the possibility of the
20 tunnel being constructed. I think that one of the
21 things that needs to be taken into account are where are
22 the ventilation shafts going to be put if, in fact, the
23 tunnel is built?
24 I think it's very fitting that we're in a high
25 school tonight. I think that -- I live in the city of

1 South Pasadena. I live directly across the street from
2 a high school there. And my family -- everyone in my
3 community uses that high school for a number of
4 purposes. We all come together. It's a community
5 center; it's a park. It's a wonderful place. I think
6 we can all agree to that. Anytime we want to come
7 together as a community, we usually seek out places like
8 this high school tonight.
9 I'm concerned that according to these studies,
10 as I understand it, ventilation shafts have to be put at
11 the entrance and at the exit and somewhere in the
12 middle. In looking to minimize the environmental
13 impacts and something like that to ask or looking to
14 mitigate the environmental impacts like something like
15 that would have, I would hope that, you know, the study
16 takes into account eliminating the environmental impacts
17 that smokestack -- or as the studies refer to them,
18 ventilation shafts -- would have. It would be a
19 disastrous thing for them to be constructed next to a
20 high school, next to a junior high school, next to a
21 park, and I would hope that there is some consideration
22 and some thought put into where, if anywhere,
23 smokestacks in our community would be put. I would hate
24 to think that unproven technology, such as the
25 technology that is referred to in the study, EPS

1 electrostatic technology -- that's in the air -- would
2 do anything to mitigate the impact. It's almost like
3 putting a -- well, it's just not going to happen. It's
4 like putting lipstick on a pig, little pig. Excuse me.
5 Thank you.
6 MS. McCORMICK: Okay. Thank you. Did we get
7 your address?
8 MR. CORDON: I will provide that in the sign-in
9 sheet.
10 MS. McCORMICK: Okay. Thank you.
11 And our next speaker, give us your name and
12 address, please. Thank you.
13 MS. SUAREZ: Good evening. My name is Odalis
14 Suarez, and I don't know how to work the mic. I am at
15 5120 La Crescenta Avenue.
16 I just wanted to add to the environmental
17 impact study. I'd also like the study reflecting what
18 the impacts will be during the construction period
19 because no one has addressed that. And it seems to be a
20 very, very lengthy project, and as far as traffic,
21 pollution, inconvenience, that should be added to the
22 environmental impacts, and I agree with all the other
23 comments.
24 MS. McCORMICK: Thank you.
25 Okay. I have Leslie and Harry. And next?

1 MR. LEON: Harry Leon.
2 MS. McCORMICK: Thank you, Harry.
3 MR. LEON: Good evening. My name is Harry
4 Leon, and I'm a council member of CV Town Council and
5 also my colleagues, also, the president is over here.
6 My president Cheryl Davis and Odalis.
7 You guys already start -- already made your
8 decision. I think you guys are making fun of us by
9 coming, telling us about the scope, that this is full of
10 baloney. If you guys explain -- you guys already made
11 your decision; you already have the funds; you already
12 advocated all the money that is coming from overseas or
13 from China or from Dubai or whatever.
14 For the last two years you guys installed a
15 traffic light on the transition from two freeways to the
16 210 freeway. You guys need to decide about the tunnel.
17 Oh, so you said, you're thinking about it and all that.
18 Why did you just spend our tax dollars installing those
19 traffic lights, all right, for not use? You guys,
20 again, making fun of us, stating that we're still
21 thinking about making the tunnel.
22 Be honest to us, guys. We're not fools. I am
23 an immigrant -- came to this country for one reason, to
24 follow my dream. And you guys are stepping over us.
25 Come on. Who you guys fooling?

Environmental impact reports -- where is the towers going to be? What kind of gases we got? You guys don't even say anything about percent of value to home value of all that. The guy who was ahead of us, he's right. All he's asked is where they're going to go.

Who are you all fooling, guys? Come on. Thank you.

MS. McCORMICK: Thank you.

Nora Oliver. And Nora . . .

MS. OLIVER: I wasn't going to speak here. I came on a whim.

THE REPORTER: Name and address, please.

MS. OLIVER: Nora Oliver, 2258 Daisy Lane, La Canada.

I have lived in this valley since 1952. I lived here in the '50s when there was no air quality. There were times when you could not see the mountains, either side of them. And then you took care, and you cleaned up our air somewhat. But I can remember breathing, and it hurt. It hurt so bad. And if this tunnel and if this project is going to do that to my children and grandchildren, it's got to stop. Thank you.

MS. McCORMICK: Thank you.

Okay. Thank you. That's all the speaker cards that I have right now. You have one more?

Kathleen Kulper.

MS. KULPER: I feel like I'm at a little bit of a loss here, because --

THE REPORTER: Excuse me. Name and address, please.

MS. KULPER: Kathleen Kulper, 320 Georgian Road, La Canada Flintridge.

I feel like I'm at a little bit of a loss here because I had to come in late. I didn't get here until about 10 or 15 minutes ago. And I want to say that I've been following this freeway project for 30 years. I have lived on Baptiste Way, and we moved down to Georgian Road. And I would like to see the hands of all the Caltrans people that are here.

UNIDENTIFIED SPEAKER: And consultants.

MS. KULPER: And consultants.

UNIDENTIFIED SPEAKER: I retired.

MS. KULPER: I want to tell you, I got up and spoke at South Pasadena at one of your major meetings with Mr. Alatori (phonetic) that was there, and I made a reference to the fact that what you see with Caltrans is not what you get. And I truly believe that.

We have been on the waiting list in La Canada

Flintridge since over 1990 to get freeway walls here. It was promised to us. I live down on Georgian just below the fire station. The freeway is above us. They have monitored the noise in my backyard for 15 or 20 years. It is disgusting to me that they can come to these meetings and say they are going to do certain things for the communities, and they never, never do.

And I want to say that I think that they need to look at alternative routes before they ever consider coming through La Canada or South Pass. Our area here between these two valleys traps pollution. We have -- like the lady ahead of me said that we have cleaned up our air to a certain point -- this is not going to help us.

I would like to see where they're going to get their money. Why don't they plan on getting the state out of debt before they start a project like this?

And I think that everybody at Caltrans needs to refocus on what is best for the community, not what is just best for the automobile. We have a lifestyle up here that is unique to California. We don't need to lose it. And I feel that if all of us get behind what we stand for, that is a small community -- you know, when the freeway went through, they told us we were going to have no more traffic on Foothill. It's going

to take care of all the congestion on Foothill. Does anybody believe that happened? No, they didn't. And all it did was bring more traffic into our area.

When they opened the 210 east, what did they say? It wasn't going to bring more truck traffic. What has it brought us? More truck traffic. It's going to get worse and worse, especially if it comes straight up from the Port of L.A. I monitored this. I know what I'm talking about. And it's disgusting to me that our community who has supported the state with the major finances -- for tax finances and revenues -- to have this stuff in our backyards.

There needs to be something else done. And I think that they need to go back to their planning board, look at trains, transit, out through the valley, do something. Leave us alone up here. Take your money that you don't have, and put it where the state can use it most.

MS. McCORMICK: Thank you.

So I think I have all of the cards. And one more? Okay.

UNIDENTIFIED SPEAKER: In the meantime, why don't we discuss why they are destroying the CEQA laws before you shove this thing through? Why don't the Caltrans people speak up now while we're all here?

MS. McCORMICK: This is for scoping where people are going on the record. That's what this evening is about.

MR. BLAISDELL: My name is Allen Blaisdell. I live at 5152 Earl Drive in La Canada. I'm here representing myself and my wife. I didn't come prepared, but I thought I'd share some thoughts.

We lived in Burbank before we moved to La Canada. And Universal City wanted to do an expansion, and it was going to impact our neighborhood. So we went to a number of meetings, and I learned about how this process works. And there are legal hurdles which they need to meet. And that's about the only thing on our side. Otherwise big money would just put that right through.

This Environmental Impact Report has to identify problems, and then they have to address how to mitigate them. I can give you an example of how they handled this with Universal. Universal has a tour -- a tourist tour of their studio. And they have these large explosions going off per their shows that they had, so there might be one explosion every hour. The sound part of the Environmental Impact Report said it's so many decibels for this explosion, and if you average it over an hour, this is the sound you would have. So I don't

need to give any more examples.

This Environmental Impact Report -- you need to go over it and understand the methodologies, and you need to come back and say, you can't average things. You have to relate this -- what I learned was litigation is a huge, powerful tool on our side. If this impact report -- if they can't hide the fact that the air quality is bad and health is going down and the noise can't be mitigated, I believe that there's a legal course here that they are going to have to lead, and I encourage everybody to look at all of these issues and make them mitigate all the problems and make sure these problems are realistic estimations. Thank you.

MS. McCORMICK: Thank you.

I think I have all the speaker cards. We are open until 8 o'clock. If you have any questions, there will be Caltrans out in the back to help you, as well as Metro, there by those doors.

I will keep the mic open for the next -- until about 8 o'clock if anyone else would like to speak. At that time we'll close the comment period.

But in the meantime, thank you so much for coming. We appreciate you coming, and we appreciate the opportunity to hear you. Thank you. Have a good evening.

(Pause in the proceedings.)

MS. McCORMICK: We've no more speakers. I officially close this meeting. Thank you very much.

for Highland Park Meeting

SR-710 Conversations – A Series of Information Meetings

TUESDAY, APRIL 5, 2011

NAME: Lee Polley

ADDRESS: 100 S 1st St CITY: Alhambra ZIP: _____

REPRESENTING: _____

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

written comments regarding submittal of a packet of support letters for the record from a variety of national, state and local elected officials, area organizations and others.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

TESTIMONY for the RECORD
SR 710N Gap Closure Project
Scoping Session #8
April 6, 2011

Tonight we felt it appropriate to participate in the final meeting of Series 3 Scoping on an extremely positive note. Accordingly, we are entering a packet of recent letters from national, state and local elected officials as well as organizations in the gap closure area. Each of these letters calls for the completion of the 710 freeway, sooner rather than later. Some writers took the time to recount past attempts to close the Gap.

We thank CalTrans and Metro for a most comprehensive scoping process with what has been probably the most extensive opportunity for public comment ever before held.

We look forward to the Alternatives Analysis and Draft EIR/EIS publication.

Thankyou.

May 27, 2010

SR 710N Tunnel EIR/EIS (Item 17)

Board Item 55 continued from 4-22-10

Written Testimony Submitted in **Favor of Staff Recommendation and/or**

<u>Molina/Fasana Amendment</u>

U.S. Representative Judy Chu, 32nd District

California Senator Bob Huff, 29th District

California Senator Gil Cedillo, 22nd District

California Assemblymember Mike Eng, 49th District

Southern California Association of Govts

Independent Cities Association

SGV Council of Governments

Pasadena: Ordinance in Favor of Completing the 710 FWY

Business: SGV Economic Partnership

710 Freeway Coalition

Polling Data: 710 Completion

Supporters of the 710 Gap Closure

City of Alhambra

City of Monterey Park

City of San Marino

City of San Gabriel

The above are joined by the voters of Los Angeles County who passed Measure "R"

Of Note: The CTC's Public Infrastructure Advisory Committee designates the 710 North as a Level One Pipeline Project

JUDY CHU
32ND DISTRICT, CALIFORNIA

2421 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-0532
(202) 225-5464

Congress of the United States
House of Representatives
Washington, DC 20515-0532

April 21, 2010

LACMTA Board
One Gateway Plaza
Los Angeles, CA 90012

Dear Chairman Najarian and Board Members:

I write in strong support of moving forward on an Environmental Impact Report (EIR) to advance the 710 gap closure project.

Following the recently-concluded geotechnical tunnel study which determined that tunneling is both safe and feasible, the next natural step for the Metro Board is to instruct Metro staff to prepare a robust scoping document, Alternatives Analysis and the appropriate environmental documents that will advance the project forward.

I do not believe that we should delay this step any further. Communities affected by the gap have waited for over 40 years for progress and we are closer than ever before to finding consensus and a truly effective solution. However, some of my colleagues and other elected officials have urged consideration of a broad range of transportation options that may provide the same congestion relief and a lower cost than a tunnel.

I agree that we must include a serious analysis of the transportation alternatives that solve the problem of the 710 gap, although ultimately I do not believe there will be another viable option that can provide the same congestion benefits as the underground proposal. In fact, it is a normal part of the environmental process to look at all viable alternatives in an EIR and give them consideration. This EIR should be no different and this is why we should move forward. I urge the Metro staff to include a robust analysis of alternatives that will address these questions and concerns.

From my very first days as a Councilmember and Mayor of Monterey Park, to my current post as Congressmember for the 32nd Congressional District, I have been committed to closing the 710 gap between Interstate 10 and Interstate 210. It is because this gap has not only negatively effected my communities, but also the entire San Gabriel Valley. The impact of cars and trucks leaving the highway network and using local roads to bridge this gap has devastated my communities with traffic congestion, pollution, economic degradation and safety problems.

The impact of the 710 gap has wide-reaching consequences throughout Los Angeles County, causing traffic congestion, pollution and lost economic productivity in the San Gabriel Valley,

PRINTED ON RECYCLED PAPER

the Gateway Cities region and the City of Los Angeles. For these reasons the San Gabriel Valley cities, through their Council of Governments, has adopted the 710 gap closure as their top highway priority, and has approved a unanimous position of support for this motion that moves the project forward.

In November 2008 San Gabriel Valley residents came out in support of Measure R, a sales tax proposition that allocated the largest portion of San Gabriel Valley project funds to the 710 gap closure tunnel project. The funds available—$780 Million—were made available to advance this project, complete a full review of the tunnel and potentially attract a public-private partnership or other funding mechanism to complete this highway project so central to the Los Angeles County highway network.

The Environmental Impact Report will advance this project, and reflects the overwhelming position of the San Gabriel Valley cities that recognize, as I do, that completing the 710 gap is the highest highway priority for the two million residents of this region. We simply cannot delay progress on this project.

Sincerely,

Judy Chu

JUDY CHU, Ph.D.
Congressmember, 32nd District

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California State Senate

SENATOR
BOB HUFF
TWENTY-NINTH SENATE DISTRICT

COMMITTEES
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VICE-CHAIR
TRANSPORTATION AND HOUSING
VICE-CHAIR
BUDGET AND FISCAL REVIEW
NATURAL RESOURCES AND WATER
PUBLIC SAFETY

May 19, 2010

Ara Najarian, Chair
MTA Board of Directors
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chair Najarian,

I write to express my support for moving forward on an Environmental Impact Report/Environmental Impact Statement EIR/EIS to advance the 710 gap closure project following the recently concluded geotechnical tunnel study.

From my time on the Diamond Bar City Council and as a Past Vice President of the San Gabriel Valley Council of Governments continuing through my time in the Legislature, I have long advocated for the completion of the 710 gap closure project.

The impact of the 710 gap has wide-reaching consequences throughout Los Angeles County, causing traffic congestion, pollution and lost economic productivity in the San Gabriel Valley. The completion of the 710 gap has long been recognized as a priority by all of the major transportation agencies associated with our region including Metro, SCAG and Caltrans.

The voters of Los Angeles County approved Measure R and a tunnel to close the 710 N Freeway gap in November, 2008. The $780 million made available by Measure R moves the tunnel project forward and the next step is the authorization of an EIR/EIS.

The 710 freeway corridor connects with all east/west and north/south freeways in the southern part of our state. Additionally, the 710 Freeway corridor runs from the ports of Los Angeles and Long Beach to the 210 Foothill Freeway. The ports are vital economic engines for the state and the nation. The efficient movement of people and goods throughout the freeway

system translates into immediate benefits to all Southern California residents. These benefits are not only economic but integral to our quality of life.

I strongly encourage the Metro Board of Directors to take action to authorize initiation of the Environmental Impact Report/Environmental Impact Statement EIR/EIS for this important regional project.

Should you have any questions or wish to discuss this further, please contact me at (916) 651-4029. Thank you for your attention to this matter.

Sincerely,

BOB HUFF
Senator, 29th District

SENATE
CALIFORNIA LEGISLATURE

SACRAMENTO
State Capitol
Room 5100
Sacramento, CA 95814
(916) 651-4022

DISTRICT OFFICE
Oviatt Building
617 S. Olive Street, Suite 710
Los Angeles, CA 90014
(213) 612-9566

GILBERT A. CEDILLO
SENATOR, TWENTY SECOND DISTRICT

May 19, 2010

The Honorable Ara J. Najarian
Chair
Board of Directors
Los Angeles Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles CA 90012-2952

Re: Route 710 North Extension Project Next Steps

Dear Chairman Najarian and Board Members:

At an allocated cost of 2.4 million dollars, the recently released Final Geotechnical Summary Report for Route 710 Tunnel Technical study found that in a route-neutral study, a tunnel was indeed feasible. Board Member Fasana and Supervisor Molina previously introduced a motion at the Measure R Project Delivery Committee Meeting that directly addresses this very important and unique option that never existed, much less discussed throughout this 50 year old debate – a tunnel alternative.

For decades MTA and Cal Trans have sought transportation alternatives. There have been expanded bus and rail lines, installation of synchronized lights, street expansion and other transportation options that were introduced in an all out effort to alleviate the traffic that impacts the cities of Los Angeles, Alhambra, and South Pasadena. Still, congested streets and slow traffic continue to adversely impact the quality of life for many of the residents.

The tunnel is a fresh alternative that was never addressed in the previous studies and should be further explored.

I respectfully urge the Board to support the Directors Fasana Molina Motion Route 710 North Extension Project Next Steps.

Sincerely,

Gil Cedillo

Gilbert A. Cedillo
State Senator, 22nd District

Assembly
California Legislature

MIKE ENG

April 21, 2010

Ara Najarian, Chair
Metropolitan Transportation Authority (Metro) Board of Directors
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chair Najarian:

On behalf of the residents and cities that comprise the 49th Assembly District, Alhambra, El Monte, Monterey Park, Rosemead, San Gabriel, San Marino, South El Monte, I strongly urge the Metro Board of Directors to approve the Molina-Fasana motion which would move forward the EIR/EIS process for the 710 Tunnel gap closure project. As the representative for the cities most directly affected by this project, I request that the Metro Board of Directors act in accordance with the voice of the voters and provide funding for the next step in this process—the completion of an EIR/EIS. As an Assemblymember and immediate Past Chair of the Assembly Committee on Transportation, I have continually expressed my unwavering support for this important project and have authored and supported legislation that would facilitate completion of this project.

While other State and Federal legislators argue that more study is needed before undertaking an EIR/EIS, I disagree. This project is one of the most extensively studied transportation projects in Los Angeles County. As recently as last month, Caltrans and Metro completed a study which determined that it is geotechnically feasible to design, operate and construct a tunnel to close the 710 gap. Furthermore, the ballot language of Measure R specifically identifies that project as a tunnel.

It is critical that Metro maintain the good faith of the voters and allocate the needed funding to this project to begin the environmental review process. In the San Gabriel Valley, Measure R was supported by 63% of the voters, and the $780 million for the 710 tunnel is the largest Measure R allocation to a project in the San Gabriel Valley. This project also has widespread regional support, as evidenced by the unanimous vote of the San Gabriel Valley Council of Government's Governing Board to reaffirm that agency's long-standing support of the SR-710 Gap Closure project and request that Metro take action to move forward with the environmental review process for this important regional transportation project.

For the reasons identified above, I once again urge approval of the Molina-Fasana motion to be considered at the April Metro Board of Directors' meeting.

Sincerely,

Mike Eng

MIKE ENG
Assemblymember, 49th District

ME:dm

cc: Stephen Sham, Mayor, City of Alhambra
Andre Quintero, Mayor, City of El Monte
Anthony Wong, Mayor, City of Monterey Park
Gary Taylor, Mayor, City of Rosemead
Albert Huang, Mayor, City of San Gabriel
Dennis Kneier, Mayor, City of San Marino
Louie Aguinaga, City of South El Monte

SOUTHERN CALIFORNIA

ASSOCIATION of GOVERNMENTS

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April 21, 2010

Hon. Ara Najarian
Board Chair, Los Angeles County MTA
Mayor, City of Glendale
613 E. Broadway
Glendale, CA 91206-4391

Dear Chairman Najarian:

RE: METRO BOARD AGENDA ITEM #55

This letter is to support Agenda item #55 recommendation to receive and file the Final Geotechnical Summary Report for the Route 710 Tunnel Technical Study; direct the Chief Executive Officer to utilize the Transportation Planning Bench and/or advertise and procure consultant services to prepare a robust scoping document, Alternative Analysis and the appropriate environmental documents to determine the full range of new transportation options to (1) improve mobility, safety and congestion, (2) address community concerns and (3) augment planning efforts; and authorize the CEO to execute a Funding Agreement with Caltrans and others should additional funds become available.

The SCAG Regional Council has included the project in the adopted Regional Transportation Plan (RTP) to relieve regional and local congestion, improve mobility and improve air quality since 1989 and in the Regional Transportation Improvement Program (RTIP) since 1991.

Completion of the SR-710 freeway has long been supported by federal, state, regional, and local agencies including the FHWA, Caltrans, SCAG and Metro, as evidenced by a Record of Decision (ROD) that was issued by FHWA on a Final EIS in April of 1998. Moreover, corridor level analysis associated with 2004 RTP clearly showed positive mobility and air quality benefits with the project. Findings from recent analysis focused on localized traffic impacts of a connection using a deep vehicular tunnel are consistent with previous results indicating regional mobility and air quality benefits, even with projected increases in population.

SCAG supports the motion (Agenda item #55) by Hon. John Fasana, Councilmember, City of Duarte, and Hon. Gloria Molina, Supervisor, Los Angeles County, 1st District, to advance efforts for initiation of an Alternative Analysis and the appropriate environmental documents related to the SR-710. Thank you for consideration of this request. SCAG looks forward to partnering with Metro on completion of this critical transportation infrastructure project important to regional mobility and air quality conformity. Please contact me at (213) 236-1994 if I can be of further assistance.

Sincerely,

Hasan Ikhrata
Executive Director,
Southern California Association of Governments

HI:an

Cc:
Hon. Don Knabe, 1st Vice-Chair, Supervisor, Los Angeles County, 4th District
Hon. Antonio Villaraigosa, 2nd Vice-Chair, Mayor, City of Los Angeles
Hon. Michael D. Antonovich, Supervisor, Los Angeles County, 5th District
Hon. Diane DuBois, Councilmember, City of Lakewood
Hon. John Fasana, Councilmember, City of Duarte
Hon. José Huizar, Councilmember, City of Los Angeles
Hon. Richard Katz, Mayor Appointee, City of Los Angeles
Hon. Gloria Molina, Supervisor, Los Angeles County, 1st District
Hon. Pam O'Connor, Councilmember, City of Santa Monica
Hon. Rita Robinson, Mayor Appointee, City of Los Angeles
Hon. Mark Ridley-Thomas, Supervisor, Los Angeles County, 2nd District
Hon. Zev Yaroslavsky, Supervisor, Los Angeles County, 3rd District
Art Leahy, Chief Executive Officer

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E-mail: independentcities@earthlink.net
Website: icacities.org

"Cities Working for Cities"

April 21, 2010

Ara Najarian, Chair
Metropolitan Transportation Authority (Metro)
Board of Directors
One Gateway Plaza
Los Angeles, California 90012-2952

Re: Support Completion Of The EIR/EIS For The 710 Tunnel Gap Closure Project - Approval Of The Molina-Fasana Motion

Dear Chair Najarian:

The Independent Cities Association (ICA), which represents 48 cities in Los Angeles County and 7 million residents, urges your approval of the Molina-Fasana motion to move forward the EIR/EIS process for the 710 Tunnel gap closure project. In November 2008, the voters of Los Angeles County approved Measure R, a self-imposed half-cent sales tax which provides $780 million for this important regional transportation project. In addition, the ballot language of Measure R specifically identifies that project as a tunnel. It is critical that Metro maintain the good faith of the voters and allocate the needed funding to this project to begin the environmental review process.

The Independent Cities Association believes that more study is needed before undertaking an EIR/EIS. This project is one of the most extensively studied transportation projects in Los Angeles County. As recently as last month, Caltrans and Metro completed a study which determined that it is geo-technically feasible to design, operate and construct a tunnel to close the 710 gap.

For these reasons, the Independent Cities Association urges approval of the completion of the EIR/EIS for the 710 tunnel gap closure project (Molian-Fasana motion). Thank you for your consideration of this request.

Sincerely,

Frank Venti

Frank Venti, Chair
ICA Legislative Committee

MEMBER CITIES:

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Bell	Covina	Glendora	Long Beach	Monterey Park	San Marino	West Covina
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Beverly Hills	Downey	Hermosa Beach	Lynwood	Redondo Beach	Sierra Madre	

San Gabriel Valley Council of Governments

April 16, 2010

Ara Najarian, Chair
Metropolitan Transportation Authority (Metro) Board of Directors
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chair Najarian:

At the April 15, 2010 Governing Board meeting, San Gabriel Valley Council of Governments (SGVCOG) voted unanimously to reaffirm our agency's long-standing support of the SR-710 Gap Closure project and request that the Metropolitan Transportation Authority (Metro) take action to move forward with the environmental review process for this important regional transportation project.

On behalf of the SGVCOG, I would like to express our Agency's appreciation for the effort of Metro and Caltrans to complete the SR-710 Geotechnical Feasibility Study. The work of your staff, Caltrans' staff and the consultant on drafting this report clearly embraces and achieves its intended purpose.

The completion of the 710 Freeway has long been recognized as a priority project by all of the major transportation agencies associated with our region including Metro, SCAG, and Caltrans. This vital transportation project has also been a stated priority of the SGVCOG for fifteen years. It is estimated that this project would serve Los Angeles County's residents by eliminating over one ton of emissions per day and reducing the region's congestion waiting time by 6.2 million hours annually. This project is also critical to our region's ability to meet federal clean air requirements.

It is our hope that this study will bring closure to outstanding concerns related to this project and develop consensus for moving forward with completion of the 710 Freeway---a project that will service the residents of the San Gabriel Valley as well as greater Los Angeles County. We strongly encourage the Metro Board of Directors to review this study at its April meeting and request that the Board take action to authorize initiation of the Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for this important regional project.

Thank you again for the efforts of Metro and Caltrans on this study. Should you have any questions or wish to discuss this further, please contact me at (626) 564-9702.

Sincerely,

Thomas P. King

Thomas P. King
President

Cc: Metro Board of Directors
Art Leahy, CEO, Metro
Doug Failing, Director of Highway Programs, Metro
Hasan Ikhrata, Executive Director, Southern California Association of Governments (SCAG)
Mike Miles, Director, Caltrans District 7
Abdi Saghafi, Project Manager, Caltrans District 7
San Gabriel Valley Congressional Caucus
San Gabriel Valley Legislative Caucus
SGVCOG Member Agencies

CITY COUNCIL
CHRIS HOLDEN
COUNCILMEMBER
DISTRICT 5

May 24, 2010

Honorable Ara Najarian, Chair
and Board Members
L.A. County Metro Board of Directors
One Gateway Plaza
Los Angeles, CA 90012-2952

VIA FAX 213-922-4894

Dear Chair Najarian and Metro Board Members:

As you take up discussion of the 710 Freeway tunnel at your May 27 meeting, please make this fact absolutely clear: The City of Pasadena SUPPORTS completion of the 710 Freeway. On March 6, 2001, the voters of the City of Pasadena passed the following ballot measure by a margin of 58 percent to 42 percent:

The City Attorney's impartial analysis of Measure A is as follows: If this measure is approved by the voters, the official position of the City of Pasadena will favor completing the 710 Freeway extension between the I-210 and I-10 Freeways, and that position could be changed only by a vote of the people. Although this measure would not bind state officials to completing the 710 Freeway extension, it would constrain City officials from adopting a contrary policy or from exercising their authority contrary to this policy.

I urge you to consider the 710 Freeway support of the voters of Pasadena and vote to move the 710 project forward at your May 27 Board meeting.

Sincerely,

CHRIS HOLDEN
Councilmember

100 North Garfield Avenue • Pasadena, CA 91109

ORDINANCE NO. 6851

AN UNCODIFIED ORDINANCE OF THE CITY OF PASADENA IN FAVOR OF COMPLETING THE 710 FREEWAY

WHEREAS: It is important that the voters of the City of Pasadena set City policy favoring completion of the 710 Freeway between the I-210 Freeway and the I-10 Freeway. Such a policy is important to the future of the City. With such a policy the City can commit energies and resources to the completion of the 710 Freeway. Such a policy will also communicate to elected officials and staff at the County, State and Federal levels the will of the people of Pasadena to complete the 710 Freeway.

The People of the City of Pasadena ordain as follows:

SECTION 1. The policy of the City of Pasadena favors completion of the 710 Freeway between the I-210 Freeway and the I-10 Freeway.

SECTION 2. This ordinance shall not be repealed or amended except by a vote of the people.

SECTION 3. If passed, this ordinance shall be considered as adopted upon the date that the vote is declared by the legislative body, and shall go into effect 10 days after that date.

I HEREBY CERTIFY that the foregoing ordinance was approved and has become effective as of the following dates:

Date of Election: March 6, 2001
Date of Adoption: March 19, 2001 (date canvass results were presented and accepted by City Council)
Yes Votes: 9,654 (58.3%)
No Votes: 6,908 (41.7%)
Effective Date of Ordinance: March 29, 2001
Published: April 10, 2001

Jane L. Rodriguez
Jane L. Rodriguez, City Clerk

APPROVED AS TO FORM:

Nicholas G. Rodriguez
Assistant City Attorney

The Partnership
San Gabriel Valley Economic Partnership

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May 19, 2010

Metro Board of Directors
LA County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chairman Najarian and Members of the Metro Board of Directors:

The San Gabriel Valley Economic Partnership supports the completion of an EIR and EIS for the 710 Freeway Gap Closure Project. The tunnel option being considered may provide the transportation connection needed for moving goods and people with reduced environmental and community impacts. These are the questions that our environmental processes were developed to consider and we believe that is it important to complete this work so a full understanding of the project's impact is available for Metro and for the public to review.

While we continue to support investments in public transit, public transit does not provide for the movement of good and materials that is critical to a region that depends on international trade. Investments in our road and freeway systems are also important for our economy.

We ask that you move forward with these environmental reviews. Thanks you for your consideration.

Sincerely,

Cynthia Kurtz

Cynthia J. Kurtz
President & CEO

4900 Rivergrade Road, Suite A310, Irwindale, California 91706
Phone (626) 856-3400 Fax (626) 856-5115
www.valleyconnect.com www.VisitSanGabrielValley.com

710 Freeway Coalition

100 E. Corson St., Suite 200, Pasadena, CA 91103
(626) 578-0705 • FAX (626) 578-0706 natread@aol.com

Via Facsimile: 213-922-4594

May 21, 2010

Honorable Ara Najarian, Chair
And Board Members
L.A. County Metro Board of Directors
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chair Najarian and Metro Board Members:

The 710 Freeway Coalition is a grassroots collective representing over 50 cities and labor and business organizations.

The Coalition urges you to move forward the 710 project on May 27.

As you weigh this matter, consider this fact: Voter support is more heavily documented for the 710 than on any other MTA project, by far.

Over 50 cities, city council districts and districts of the State Assembly, State Senate and Congress have been surveyed. There is NO city or district surveyed in a public poll that is opposed to the 710 completion. NONE! (Including South Pasadena and La Cañada Flintridge, where the voters are tied for and against)

Your constituents demand action. Please move this project forward at your May 27 meeting.

Sincerely,

Nat B. Read, Chair

710 Freeway Coalition

100 E. Corson St., Suite 200, Pasadena, CA 91103
(626) 578-0705 • FAX (626) 578-0706

Poll Results – April 2004

Question: The 710 Gap Closure Project would complete the last four and a half miles of the 710 Freeway in the corridor that runs through El Sereno and South Pasadena into the City of Pasadena. Do you support or oppose the completion of the 710 Freeway?

Poll conducted by Godbe Research & Analysis
3,531 voters surveyed. Margin of error = less than 5%

	Ratio of Support to Oppose %	Combined Support %	Combined Oppose %	Strongly Support %	Somewhat Support %	Somewhat Oppose %	Strongly Oppose %	Don't Know %
City of Los Angeles	**5.25 to 1**	**45.7**	**8.7**	26.3	19.4	3.3	5.4	45.5
L.A. City Council Dist 14 Antonio Villaraigosa	**2.29 to 1**	**54.4**	**23.8**	36.1	18.3	7.5	16.3	21.9
Congress District 29 Adam Schiff	**2.30 to 1**	**51.3**	**22.3**	34.2	17.1	5.8	16.5	26.4
Congress District 34 Lucille Roybal-Allard	**5.44 to 1**	**58.8**	**10.8**	35.0	23.8	4.5	6.3	30.4
State Senate District 21 Jack Scott	**2.88 to 1**	**48.3**	**16.8**	29.9	18.4	4.7	12.1	35.0
State Senate District 22 Gilbert Cedillo	**2.97 to 1**	**52.5**	**17.7**	32.4	20.1	4.9	12.8	29.8
State Senate District 24 Gloria Romero	**4.47 to 1**	**55.9**	**12.5**	37.5	18.4	5.2	7.3	31.7
Assembly District 43 Dario Frommer	**3.25 to 1**	**41.6**	**12.8**	21.5	20.1	4.1	8.7	45.6
Assembly District 44 Carol Liu	**1.99 to 1**	**54.2**	**27.2**	37.6	16.6	7.1	20.1	18.7
Assembly District 45 Jackie Goldberg	**2.72 to 1**	**45.7**	**16.8**	28.0	17.7	4.8	12.0	37.6
Assembly District 46 Fabian Nuñez	**6.98 to 1**	**58.6**	**8.4**	33.2	25.4	2.7	5.7	32.9
Assembly District 49 Judy Chu	**3.21 to 1**	**57.8**	**18.0**	39.0	18.8	7.2	10.8	24.3
City of La Cañada Flintridge	**.97 to 1**	**40.6**	**42.0**	27.6	13.0	8.6	33.4	17.4

710 Freeway Coalition
140 S. Corona St., Suite 208, Pasadena, CA 91103
(626) 578-0785 • FAX (626) 578-0796

Summaries of public polls regarding support of opposition to completing the 710 Freeway

	Alhambra	El Sereno	Glendale	La Cañada	Los Angeles	Pasadena	S Gabriel Valley	South Pasadena	South Pasadena
Population	85,804	47,291	200,000	20,318	3.7 million	133,936	1.9 million	24,292	24,292
Poll Date	Sept,1999	Nov, 2000	May, 2009	May, 2004	May, 2004	Mar, 2000	July, 2000	Mar, 1998	Apr, 2006
Pollster	Guerra & Assoc./Godbe Research and Analysis	Guerra & Assoc./Godbe Research and Analysis	Godbe Research and Analysis	Godbe Research and Analysis	Godbe Research and Analysis	Godbe Research and Analysis	The Rose Institute	Godbe Research and Analysis	Godbe Research and Analysis
Question	"Do you support or oppose completing the 710 Freeway to the 210 Freeway?"	"First, do you support or oppose completing the 710 Freeway?"	"Do you support or oppose completion of the 710 Freeway?"	"Do you support or oppose the completion of the 710 Freeway Project?"	"The 710 Gap Closure Project would complete the last 4 ½ of the 710 Fwy in the corridor that runs thru El Sereno and So. Pas. into the City of Pasadena. Do you support or oppose the completion of the 710 Fwy?"	"First, do you support or oppose completing the 710 Freeway, also known as the Long Beach Freeway?"	"Do you support completion of the 710 Freeway?"	"In order to connect 2 sections of the 710 Fwy between the 10 and 210 Fwys, shall a new 6-mi. section of the 710 Fwy. be built through the center of South Pasadena?"	"Instead of the surface freeway long opposed, would you now support or oppose an alternative plan to construct a tunnel at least 100 feet underneath So. Pasadena to complete the 710 Freeway?
For 710	81%	60%	51%	41%	45%	59%	63%	17%	42%
Definitely yes	Definitely support 71%	Definitely support 45%	Strongly support 29%	Strongly yes 28%	Strongly yes 26%	Definitely support 51%	Yes,strongl y 29%	Definitely yes 12%	Strongly support 17%
Probably yes	Probably support 10%	Probably support 15%	Somewhat Support 22%	Somewhat yes 13%	Somewhat yes 19%	Probably support 8%	Yes 34%	Probably yes 5%	Somewhat support 25%
Against 710	11%	28%	21%	42%	8%	18%	11%	80%	41%
Probably no	Probably oppose 3%	Probably oppose 6%	Somewhat oppose 7%	Somewhat no 9%	Somewhat no 3%	Probably oppose 3%	No 7%	Probably no 7%	Somewhat oppose 9%
Definitely no	Definitely oppose 8%	Definitely oppose 22%	Strongly oppose 14%	Strongly no 33%	Strongly no 5%	Definitely oppose 15%	No strongly 4%	Definitely no 73%	Strongly oppose 31.5%
Ratio Yes/no	YES 7.4:1	YES 2.1:1	YES 2.4:1	EVEN	YES 5.6:1	YES 3.3:1	YES 5.7:1	NO 4.7:1	EVEN
Undecided; don't know; etc	8%	13%	28%	17%	46%	24%	26%	4%	17 5%

MEMORANDUM

TO: Honorable Chair Najarian and Members of the Metro Board of Directors

FROM: Leland C. Dolley and the Supporters of the 710 Gap Closure

DATE: April 20, 2010

SUBJECT: SR 710N Tunnel Project: Support of Board Action to Proceed with EIR/EIS

As many are aware, the 710 gap closure has been the subject of much debate and many false starts since the freeway plan first identified this important link in the California system, several decades ago. The proposal for a Tunnel to close the gap was first made over ten years ago. We know today, in 2010, with the recently completed CalTrans Tunnel Feasibility Study, and Metro's own 2006 Tunnel Study, that a tunnel is, indeed, a technically feasible approach to closing the gap.

There is much support for the gap closure locally, regionally and statewide. The passage of Measure "R" with the 710 Tunnel included as a major highway project, has elevated the responsibility of all agencies involved to complete the gap in a timely manner. Previous to Measure "R" the gap closure had been consistently included and identified as one of the most important highway infrastructure improvements in California needed for the region and the state to move people and goods efficiently. Examples include:

-identification of the Tunnel as a major link in the Interstate 710 Corridor; a corridor of national importance, by the California Transportation Commission and its PIAC Committee

-inclusion of the 710N Tunnel since 1980 in the Regional Transportation Plan (RTP) prepared by the Southern California Association of Governments and approved by the federal government every four years

-inclusion of the Tunnel since 1991 in the Regional Transportation Improvement Plan (RTIP) prepared by the Southern California Association of Governments and approved by the federal government every 5 years.

-inclusion of the Tunnel in Metro's Long Range Transportation Plan and Transportation Improvement Plan, both for Los Angeles County, and most recently adopted in November, 2009 and March, 2010, respectively

In the examples above, the gap closure environmental benefits have been identified and analyzed in both the short and long term. The completion of the gap has been proven over and over to demonstrate mobility benefits with a significant reduction of pollution. Closing the gap also redistributes area wide freeway traffic and reduces the burden of excess traffic on local arterials now being used to accommodate the traffic seeking the 210 freeway or points south from the 210 freeway.

There is concern about the construction and operational environmental impacts a Tunnel may have. All interested parties need a definitive, exhaustive environmental impact analysis with which to elevate the dialogue leading to a construction decision, sometime in the future. In order for this important dialogue to be meaningful, the Tunnel Project EIR/EIS should begin as soon as possible.

NOW is the time for this important highway project to move to the next step. We respectfully request your support to begin the EIR/EIS Scoping sessions and Environmental Document preparation immediately.

City of Alhambra

Office of the Mayor and City Council

Gateway to the San Gabriel Valley

111 South First Street
Alhambra
California
91801

April 20, 2010

Ara Najarian, Chair
Metropolitan Transportation Authority (Metro) Board of Directors
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chair Najarian:

On behalf of the City of Alhambra, I urge approval of the Molina-Fasana motion to move forward the EIR/EIS process for the 710 Tunnel gap closure project. In November 2008, the voters of Los Angeles County approved Measure R, a self-imposed half-percent sales tax which provides $780 million for this important regional transportation project. As one of the cities most directly affected by this project, we request that the Metro Board of Directors act in accordance with the voice of the voters and provide funding for the next step in this process—the completion of an EIR/EIS.

While some individuals and other jurisdictions argue that more study is needed before undertaking an EIR/EIS, our city disagrees. This project is one of the most extensively studied transportation projects in Los Angeles County. As recently as last month, Caltrans and Metro completed a study which determined that it is geotechnically feasible to design, operate and construct a tunnel to close the 710 gap. Furthermore, the ballot language of Measure R specifically identifies that project as a tunnel. It is critical that Metro maintain the good faith of the voters and allocate the needed funding to this project to begin the environmental review process. In the San Gabriel Valley, Measure R was supported by 63% of the voters, and the $780 million for the 710 tunnel is the largest Measure R allocation to a project in the San Gabriel Valley. This project also has widespread regional support, as evidenced by the unanimous vote of the San Gabriel Valley Council of Government's Governing Board to reaffirm that agency's long-standing support of the SR-710 Gap Closure project and request that Metro take action to move forward with the environmental review process for this important regional transportation project.

For the reasons identified above, the City of Alhambra once again urges approval of the Molina-Fasana motion to be considered at the April Metro Board of Directors' meeting.

Sincerely,

Stephen Sham
Mayor

cc:
Michael Miles, Caltrans District 7, District Director
Senator Carol Liu
Senator Gill Cedillo
Senator Gloria Romero
Assemblymember Anthony Portantino
Assemblymember Michael Eng
Mayor Bill Bogaard, City of Pasadena

Mayor Richard Schneider, City of South Pasadena
Mayor Anthony Wong, City of Monterey Park
Mayor Albert Hwang, City of San Gabriel
Mayor Laura Olhasso, City of La Cañada Flintridge
Mayor Dennis Kneier, City of San Marino

City of Monterey Park
320 W. Newmark Avenue Monterey Park CA 91754-2896
www.ci.monterey-park.ca.us

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Mitchell Ing
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City Clerk
David Barron

City Treasurer
Joseph Leon

April 21, 2010

Ara Najarian, Chair
Metropolitan Transportation Authority (Metro) Board of Directors
One Gateway Plaza
Los Angeles, CA 90012-2952

RE: SUPPORT THE COMPLETION OF THE EIR/EIS FOR THE 710 TUNNEL GAP CLOSURE PROJECT – APPROVAL OF THE MOLINA-FASANA MOTION

Dear Chair Najarian:

The City of Monterey Park urges your approval of the Molina-Fasana motion to move forward the EIR/EIS process for the 710 Tunnel gap closure project. In November 2008, the voters of Los Angeles County approved Measure R, a self-imposed half-percent sales tax which provides $780 million for this important regional transportation project. As one of the cities most directly affected by this project, Monterey Park requests that the Metro Board of Directors act in accordance with the voice of the voters and provide funding the next step in this process – the completion of an EIR/EIS.

While some individuals and other jurisdictions argue that more study is needed before undertaking an EIR/EIS, Monterey Park disagrees. This project is one of the most extensively studied transportation projects in Los Angeles County. As recently as last month, Caltrans and Metro completed a study which determined that it is geo-technically feasible to design, operate and construct a tunnel to close the 710 gap.

Furthermore, the ballot language of Measure R specifically identifies that project as a tunnel. It is critical that Metro maintain the good faith of the voters and allocate the needed funding to this project to begin the environmental review process. In the San Gabriel Valley, Measure R was supported by 63 percent of the voters, and the $780 million for the 710 tunnel is the largest Measure R allocation to a project in the San Gabriel Valley. This project also has widespread regional support, as evidenced by the unanimous vote of the San Gabriel Valley Council of Government's Governing Board to reaffirm that agency's long-standing support of the SR-710 Gap Closure project and request that Metro take action to move forward with the environmental review process for this important regional transportation project.

For this reasons, the City of Monterey Park urges approval of the Molina-Fasana motion to be considered at the April Metro Board of Directors' Meeting. We appreciate your assistance with this important issue.

Sincerely,

Anthony Wong

Mayor Anthony Wong

C: Members, Metro Board of Directors
Michael Miles, Caltrans District 7, District Dir.
Senator Carol Liu
Senator Gil Cedillo
Senator Gloria Romero
Assembly Member Anthony Portantino
Assembly Member Michael Eng
Mayor Bill Bogaard, City of Pasadena
Mayor Richard Schneider, City of South Pasadena
Mayor Stephan Sham, City of Alhambra
Mayor Albert Hwang, City of San Gabriel
Mayor Laura Olhasso, City of La Canada Flintridge
Mayor Dennis Kneier, City of San Marino

City of Monterey Park
320 W. Newmark Avenue, Monterey Park, CA 91754-2896
www.ci.montereypark.ca.us

Mitchell Ing
David T. Lee
Benjamin "Frank" Veng
Anthony Wong

City Clerk
David Barron

City Treasurer
Joseph Leon

May 21, 2010

Honorable Ara Najarian, Chair
And Board Members
Los Angeles County Metro Board of Directors
One Gateway Plaza
Los Angeles, CA 90012-2952

RE: SUPPORT MOVING THE 710 FREEWAY PROJECT FORWARD TO THE EIR STAGE

Dear Chair Najarian and Metro Board Members:

On your May 27, 2010 agenda is a matter of utmost urgency to the region and that is moving forward with the 710 Freeway Completion Project. The City of Monterey Park urges your full support on this issue.

The vast majority of your constituents FAVORS completion of the 710 Freeway with only very few in disagreement. The City of Los Angeles voters support the 710 Freeway Completion Project by a margin of five to one. In the 30-city San Gabriel Valley, support is six to one. There is no city, not city council district, no state assembly district, no state senate district, no congressional district polled in a public poll where the majority opposes the 710 Freeway Completion Project. Even in South Pasadena and La Canada voters are evenly split.

By your own ranking the 710 Freeway completion will reduce traffic congestion more than any other highway project. The Southern California Association of Governments ranks the project number one in the reduction of air pollution in the region.

The project has been studied for over 50 years. On May 27, 2010, the City of Monterey Park respectfully requests that you move the project forward. We appreciate your attention to this critical matter.

Sincerely

Anthony Wong
Mayor

April 21, 2010

Ara Najarian, Chair
Metropolitan Transportation Authority (Metro) Board of Directors
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chair Najarian:

On behalf of the City of San Gabriel, I urge approval of the Molina-Fasana motion to move forward the EIR/EIS process for the 710 Tunnel gap closure project. In November 2008, the voters of Los Angeles County approved Measure R, a self-imposed half-percent sales tax which provides $780 million for this important regional transportation project. As one of the cities most directly affected by this project, we request that the Metro Board of Directors act in accordance with the voice of the voters and provide funding for the next step in this process—the completion of an EIR/EIS.

While some individuals and other jurisdictions argue that more study is needed before undertaking an EIR/EIS, our city disagrees. This project is one of the most extensively studied transportation projects in Los Angeles County. As recently as last month, Caltrans and Metro completed a study which determined that it is geotechnically feasible to design, operate and construct a tunnel to close the 710 gap. Furthermore, the ballot language of Measure R specifically identifies that project as a tunnel. It is critical that Metro maintain the good faith of the voters and allocate the needed funding to this project to begin the environmental review process. In the San Gabriel Valley, Measure R was supported by 63% of the voters, and the $780 million for the 710 tunnel is the largest Measure R allocation to a project in the San Gabriel Valley. This project also has widespread regional support, as evidenced by the unanimous vote of the San Gabriel Valley Council of Government's Governing Board to reaffirm that agency's long-standing support of the SR-710 Gap Closure project and request that Metro take action to move forward with the environmental review process for this important regional transportation project.

For the reasons identified above, the City of San Gabriel once again urges approval of the Molina-Fasana motion to be considered at the April Metro Board of Directors' meeting.

Sincerely,

Albert Y. M. Huang
Mayor

c: Members of the San Gabriel City Council
Marisa Creter, San Gabriel Valley Council of Governments

SR-710 Conversations – A Series of Information Meetings

TUESDAY, APRIL 5, 2011

NAME: Harriet Hammons hhammons@lausd.net

ADDRESS: 5404 Rock Castle Dr CITY: La Canada ZIP: 91011

Resident LCF 40 yrs.

REPRESENTING: La Cañada Flintridge Ambassador
La Cañada United Methodist Church

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

There is concern about more gas ~~fumes~~ emissions / our privacy invaded! / traffic through LCF.

on the other hand getting to the 710 would be more convenient to go from the 210 to 710 710 to 210

• light rail would be great! either way

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

link to Gold line without fwy connection

Metro Caltrans

DON'T BUILD A TUNNEL. BUILD A RAILWAY FREIGHT LINE INSTEAD. DO NOT INCREASE TRUCK TRAFFIC ON THE FREEWAYS!

SR-710 Conversations – A Series of Information Meetings

DON'T BUILD AN EXTENSION OF the 710 FREEWAY.

TUESDAY, APRIL 5, 2011

NAME: Lisa Novick

ADDRESS: 1111 Uintah St. CITY: La Cañada ZIP: 91011

REPRESENTING: myself + my family (+ the children of Los Angeles!)

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

I think the proposed tunnel is an out-dated, antiquated, [redacted] inadequate and environmentally harmful so-called "solution" for the 710 extension. The freight from the port should be moved by rail, completely separate from passenger car roads, out to a hub [redacted], for example, in Palmdale. The tunnel will not relieve congestion on the 710 corridor, and will have devastating environmental impacts, from adverse health effects from increased particulate matter (adverse health effects such as increased incidences of asthma + emphysema) to increased numbers of accidents on the 210 freeway due to increased truck traffic. I demand

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

to know how this increase in gases and particulates will affect the respiratory systems of the old and young, especially given that in La Cañada all of the playing fields of schools (for example, for soccer) are within 1/4 mile of the freeway. I also demand to know how noise levels will change, affecting people's sleep patterns and mental health. I want all these concerns measured against the environmental →

PTO

Metro Caltrans

for La Canada meeting

SR-710 Conversations – A Series of Information Meetings

TUESDAY, APRIL 5, 2011

NAME: Lee Dolley

ADDRESS: 100 S first St CITY: Alhambra ZIP:

REPRESENTING:

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

written comments regarding
① The flawed Iteris Truck Study prepared by SCAG: a letter from the Exec Dir of SCAG saying draft will not be completed
② Co of LA Nov 2008 General Election Measure "R" results: request to use yes voters count in record.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

TESTIMONY for the RECORD
SR 710N Gap Closure Project
Scoping Session #7
April 5, 2011

We have two items we wish to enter on the record tonight:

1. RE: Submittal of Letter from Hasan Ikhrata, Executive Director, and Southern California Association of Governments dated December 1, 2010, withdrawing the unfinished, flawed Preliminary Draft SR-710 Missing Link Truck Study.

   Elected officials from the cities of LaCanada-Flintridge, South Pasadena and Glendale have spent the last year and a half deliberately using the above discredited study to incite the public and spread misinformation in the press about supposed "impacts" on traffic if a Tunnel is built to close the Gap. The report was never released to the public or vetted by traffic experts. Elected officials used their positions at SCAG to unethically obtain a copy of the report before it was finished in order to try and stop Metro and CalTrans from moving the 710 project forward.

   Any and all references to this study or conclusions cited from this study must not be used in the EIR/EIS analysis. As the Executive Director says:

   ...the draft scenario analyses of impacts on localized traffic should not be interpreted as a current, typical, environmental traffic impact report.....no additional work is contemplated by SCAG.

   Mr. Ikhrata further stated unconditionally, at a June, 2009 SCAG Transportation Committee meeting, that "this study does not change or refute any of the long standing research and previous studies documenting the undeniable benefits of the I-710 Gap closure that have been prepared by SCAG, Metro and CalTrans."

   The study is seriously flawed from several standpoints:

   -the study was an attempt, in a hypothetical, speculative experiment, to make the SCAG regional traffic modal apply to local surface streets. IT DID NOT WORK

   -the study had been under preparation for over 8 years before Mr. Ikhrata stopped work acknowledging that the premise and results were flawed

   -the study used very old data from 2000-2003 and defined a limited study area away from the San Gabriel Valley and the existing terminus of the 710 freeway.

2. Most everyone is aware that Measure "R" in the November 4, 2008 General Election funded transportation improvement projects and that the Gap Closure project is one. We request that the actual votes of support for Measure "R" be used in any notation about the successful measure or in any detailing of project supporters by a count. The final election returns detail that there were 2,039,214 YES votes (67.93%). A copy of these results are attached.

Thankyou

SOUTHERN CALIFORNIA

ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

Officers

President
Larry McCallon, Highland

First Vice President
Pam O'Connor, Santa Monica

Second Vice President
Glen Becerra, Simi Valley

Executive/Administration Committee Chair

Larry McCallon, Highland

Policy Committee Chairs

Community, Economic and Human Development
Bill Jahn, Big Bear Lake

Energy & Environment
Margaret Clark, Rosemead

Transportation
Greg Pettis, Cathedral City

December 1, 2010

Hon. Barbara A. Messina,
Councilmember, City of Alhambra
Alhambra City Hall,
111 South First Street, Alhambra, CA 91801

Re: SR-710 Draft Missing Link Truck Study

Dear Councilmember Messina:

In response to your request for information on the status of SCAG's Draft Missing Link Truck Study, please be advised that study methodology and findings will be updated as a part of LA Metro's upcoming Alternatives Analysis (AA) for the SR-710 North, as may be appropriate. No additional work is contemplated by SCAG.

SCAG's Missing Link Truck Study, intended to be technical and comparative in nature, relied upon data from the 2004 Regional Transportation Plan. The draft scenario analyses of impacts on localized traffic should not be interpreted as a current, typical environmental traffic impact report. Draft methodology and findings will need to be updated with current data and assumptions. As such, SCAG anticipates coordination with Metro to update study parameters as a part of Metro's initiative to conduct an Alternatives Analysis.

If you should have further questions or concerns, please do not hesitate to contact me.

Sincerely,
Hasan Ikhrata

Executive Director,
Southern California Association of Governments

HI:an

SR-710 Conversations – A Series of Information Meetings

TUESDAY, APRIL 5, 2011

NAME: Dr. C. Thomas Williams

ADDRESS: 4115 Barrett Rd CITY: LA CA ZIP: 90032-1712

REPRESENTING: Angeles Chap. Sierra Club, Transport. Comte.

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

- The EIR must include thorough assessment of all Growth Inducement effects for Origin and Destination areas including Port of LA and Long Beach, Hi Desert Corridor, Inland Empire Logistic Center, and entire I 210 east and north throughout the planning period of up to 2035 and project life period of 2060–2110.
- EIR must assign cost of all project facilities to those who would benefit by origin and destination areas.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY, APRIL 5, 2011

NAME: Anne Tryba

ADDRESS: 348 Santa Inez CITY: LaCanada ZIP: 91011

REPRESENTING: my self & my family

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

I want to know how the private/public partnership aspect of the 210 fwy Tunnel will work, especially ~~with~~ in terms of financing. How will the money collected through tolls offset the tax money spent? Please provide me with a comprehensive and detailed projection of how this is expected to unfold and function. (↓ public/private partnership) Thank you.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

TUESDAY, APRIL 5, 2011

NAME: Cindy Wilcox

ADDRESS: 4408 Union CITY: La Canada ZIP: 91011

REPRESENTING: La Canada School Board & self

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

(see attached)

Need Health risk assessment and Health impact assessment for La Cañada & La Crescenta.

Must include La Cañada & La Crescenta in the study area!

Thank you.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

My name is Cindy Wilcox. I live at 4408 Union Street, here in La Cañada.

Thank you for coming to La Cañada to hear our concerns.

I am an elected member of the School Board for the La Cañada Unified School District. We educate 4,000 children in our schools and there are numerous private schools also near the 210 Freeway.

The La Cañada School Board has taken a position against the extension of the 710 Freeway. We noted that we have schools and playing fields, including this High School and La Canada Elementary School, immediately adjacent to the 210 Freeway. We are deeply concerned about the health impact on our children.

I urge the environmental study to document the projected increase in particulate matter, nitrogen oxides,

sulfur dioxide and all hazardous air pollutants that affect the children living and going to school near the 210 Freeway.

In addition, the study needs to acknowledge that freight coming through the ports is already in containers -- containers that can be loaded and double-stacked on trains. The study must include alternatives, especially railroads, to move freight efficiently and at lowest possible pollution cost through the LA Basin.

Cities in the Los Angeles Basin have spent decades working to improve air quality. Our children and families are depending on you to find alternatives that protect this air quality and our long-term health.

SR-710 Conversations – A Series of Information Meetings

TUESDAY, APRIL 5, 2011

NAME: BRIAN HA

ADDRESS: _____ CITY: PASADENA ZIP: 91105

REPRESENTING: _____

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

I'VE BEEN A RESIDENT OF PASADENA FOR 25 YRS.
I AM NOT IN FAVOR OF THE 210/710 CONNECTION THAT HAS BEEN CONTEMPLATED FOR OVER 50 YRS!!
THE COST TO THE QUALITY OF LIFE IN PASADENA, SO. PASADENA ALHAMBRA, EL SERRENO WILL BE IMMEASURABLE SHOULD THIS PROJECT PROGRESS. FORWARD.... LET ALONE THE STAGGERING COSTS IN 2011 DOLLARS AND THE EXPECTED COST OVERRUNS AND GRAFT THAT WILL MOST ASSUREDLY ACCOMPANY A PROJECT OF THIS SIZE.

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

THIS PROJECT IS COMPLETELY IMPRACTICAL.
FOR THE LAST 10-15 YEARS THIS RIDICULOUS NOTION OF A 210/710 FREEWAY HAS LONG BEEN KNOWN AND SHOULD NOT BE PURSUED.

Metro Caltrans

OK-RON YOU CAN THROW THIS OUT CAUSE I KNOW THIS MAKES NO DIFFERENCE

SR-710 Conversations – A Series of Information Meetings

TUESDAY, APRIL 5, 2011

NAME: Dr Clyde T. Williams

ADDRESS: 4117 Barrett Rd CITY: LA ZIP: 90032-1712

REPRESENTING: LA 32 Neigh. Council

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

All Alternative must include an alternative subset of "No Trucks" and be designed to prohibit physically passage of 4-5-6 axle trucks – <14ft clearance overhead
All Alternatives must include assessment of effects of >$5/gal fuel prices
All comments, considerations, and concerns must be incorporated into the EIR

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

E-8 - Highland Park

SR-710 Conversations
Public Information and Education Meeting

ELECTED OFFICIALS/REPRESENTATIVES SIGN-IN

Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
Liz Herron	ASNC	LAND USE/ Local Issues Chair	935 W. Ave 37	90065	323-225-5711	Lizherron@AOL.Com

Ramona Hall Community Center, April 6, 2011

SR-710 Conversations
Public Information and Education Meeting

ELECTED OFFICIALS/REPRESENTATIVES SIGN-IN

Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
Diego Martin	SGVCOG	Staff	1000 S. Fremont Ave Unit 42	Alhambra 91803	626 457 1800	dmartin@sgvcog.org

Ramona Hall Community Center, April 6, 2011

SR-710 Conversations
Public Information and Education Meeting

ELECTED OFFICIALS/REPRESENTATIVES SIGN-IN

Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
PAUL HABIB	COUNCILMAN HUIZAR	Transportation Director	2035 Colorado Blvd Los Angeles CA 90041	90041	323 254-5295	paul.habib@lacity.org
Juhanne Hines	Assemblymember Portantino 44th Assembly Dist	District Director	215 N Marengo Suite 115	Pasadena 91101	626 577-9944	juhanne.hines@asm.ca.gov
Adam Ma	Senator Kevin deLeon	Senior Field Deputy	617 S Olive St #710 LA, CA 90014			adam.ma@sen.ca.gov

Ramona Hall Community Center, April 6, 2011

SR-710 Conversations
Public Information and Education Meeting

MEDIA SIGN-IN						
Name Nombre 姓名	Organization Organización 機構	Title Titulo 職務	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件
David Fonseca	Patch.com	editor	4225 Via Arbolada	90042	323 863 9945	david.fonseca@patch.com
Ted Ayala	Boulevard Sentinel	Editor		90042	(626) 676-8633	testebanayala@gmail.com

Ramona Hall Community Center, April 6, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
AIDA FERIA	CSLA	4532 MAYCREST AVE LA 90032	LA. 90032		AIDACHICA@YAHOO.	yes		
MARIANA HERRERA	N/A	3411 DORCHESTER AVE	L.A 90032	626 475-8370	MARIANAHERRERA@live.com	YES		

Ramona Hall Community Center, April 6, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
DAN FARKAS	CONSULTANT	PAS	91106	626-793-8459	danfarkas@charter.net	Y		
LoVIJA VAN LEER	RESIDENT	HIGHLAND PARK	90042	323-637.0497	l.vanleer@pacbell.net	y		
BOB AMMONS	GLASSELL PK	GLASSELL PARK	90065	(323) 256-0844	bobammons@att.net	Y		
Brigitte AMMONS	Residents	" "	" "					
WARREN CHRISTENSEN	MWA	935 W Ave 37	"	323 2224035	WNAPWOW@aol.com	Y		
MARINO PASCAL		2525 CRESTMOORE PL	90065	3232849272	mpascal@gmail.com	Y		
Scott Piotrowski	66 Prods	2456 Sandown Dr	90065	3232582751	st66prod@yahoo.com	Y		
Kat Read								
Rob McCann		20 Executive Park, Ste 200 Irvine, CA 92614	92614	949-553-0666	rob.mccann@lsa-assoc.com			
Mariana Pineda	N/A	3411 Dorchester	90032	(626) 475-8370				
ADA FERIA	N/A	4532 Maycrest	" "					

Ramona Hall Community Center, April 6, 2011

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SR-710 Conversations
Public Information and Education Meeting

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Pat Griffith		944 Elysia Dr.	90065	323 221.9807	PATGRIFFITT@EARTHLINK.NET	✓		
Antonio Rodriguez		3411 Dorchester ave	90032	323-342-0694	antonio@grodriguezlaw.com			

Ramona Hall Community Center, April 6, 2011

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SR-710 Conversations
Public Information and Education Meeting

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ARA SOUDJIAN	CONSENSUS INC			626 529-5187	arasoudjian@me.com			
James Okazaki	DHC			(213) 249-3246	JOKazaki@SBCGlobal.net			
John GEARY	GPIA							
DOMINIK WEBER			90032		DOMINIK.WEBER@ENCASE.COM	YES		
NANCY WYATT	RETIRED - HHPNC	754 N. AVE 50 - LA HIGHLAND PARK	90042	323.343.8114	nawyatt1@yahoo.com	yes		
BOB BLUME	KIMLEY-HORN & ASSOCIATES	835 WILSHIRE BLVD LOS ANGELES						
GARY PETERSON	PARSONS							
Betsy Mines	resident	2327 Yorkshire Dr LA 90065	90065	323) 255 3713	bmines@sbcglobal.net	OK		
Garrett Damrath	CT							
Janet Irwin		801 Meridian	91030					
Jesus P. Encinas	—	5870 Bonner St #101 LA CA 90042	90042	213-445-21		No		

Ramona Hall Community Center, April 6, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

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Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選“yes”或“no”）

Ramona Hall Community Center, April 6, 2011

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SR-710 Conversations
Public Information and Education Meeting

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Thuz Ly		313 S. Cordova ST	91030					
Mary Cotenacci		1818 Ramona Ave. #304	South Pas.	(626) 864-2757	Marybelle 08@earthlink.net	yes		
JIM KLEH	GLASSELL PARK IMP.	LA CA.	90065		JEKLEH@EARTHLINK.NET	YES		
SUSAN BOLAN	CRESCENTA VALLEY COMMUNITY ASSN	3528 PROSPECT AVE	LA CRESCENTA 91214	818-249-4672	Sbolan1@aol.com	YES		
Mark Vallianatos	UEPI				mvalli@oxy.edu	y		
Kevin Johnson	Fehr & Peers	201 Santa Monica Blvd	Santa Monica	310-458-9916	kjohnson@fehrandpeers.com	yes		
Stuart Warren	HMM	1409 OAKLAND RD	ARCADIA 91006	626 695 7170	Stuart.warren@hatchmott.com			
~~ADAM MC~~	~~[illegible]~~							
Cleavon Gouvan	MTA	1 gate way plaza	LA, CA 90012	213-922-3034	cleavegouvan@yahoo.com	Y		
Carol B Teutsch		841 Moon Ave	LA 90065	323 3528079	cbteutsch@comcast.net	y		
Nan Wollman		4500 N Homer St 90031	90031	323 343-1098	NANP WOLLMANSTUDIOS.COM	Y		

Ramona Hall Community Center, April 6, 2011

Metro

SR-710 Conversations
Public Information and Education Meeting

SIGN – IN

Name Nombre 姓名	Organization Organización 機構	Address Dirección 地址	City/Zip Ciudad/ Código postal 市/郵編	Phone Teléfono 電話	Email Correo Electronico 電子郵件	Would you like to receive emails about future meetings? (yes/no)	¿Usted quiere recibir correo electronico sobre reuniones en el futuro? (si/no)	您是否願意我們日後用電子郵件通知您相關訊息（選"yes"或"no")
Luis V. Valle		2331 Prince St.	L.A 90031	323 225-3385				
Tom Imta	CH2M Hill	1000 Wilshire	LA	714-435-6238	timta@CH2M.com	yes		
Toni Livingston		3229 Orula Ave	LA 90065	323-255-2051	ToniLivingston@KW	yes		
Pat Douglas		4442 Caledonia Way	LA 90065	323-257-1306	~~to~~ lazzerfa@roadrunner.com	yes		
Yoga Chadha		Los Angeles						
Jim Bednar			43031	614.668.6446				
Sam Burgess	No 710 Action Cmt.		So. Pas.					
Marie Leong		4600 Glenalbyn Dr	90065	323-225-2818	jbleong@pacbell.net			
Jae Rand		860 N. Ave 65	90042		jaecm1@aol.com			
Mary Ann Parada	No 710 Action Com.	1710 Ramona Ave	So Pas 91030	323/255-4042				
Peter Lucet	Self/Resident	1259 W. Colton.	91104	—	PeterLucetYahoo.com			

Ramona Hall Community Center, April 6, 2011

CALTRANS / METRO

SR-710 CONVERSATIONS

PUBLIC SCOPING MEETING

WEDNESDAY, APRIL 6, 2011

RAMONA HALL COMMUNITY CENTER,

LOS ANGELES, CALIFORNIA

Los Angeles, California, April 6, 2011

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MS. McCORMICK: Good evening, everyone. If you would please take your seat, we'd like to get started with our presentation this evening.

Okay. So I think we'll get started. I'd like to introduce myself. My name is Mary McCormick. I'm the president and CEO of MBI, and I'll be your facilitator for the meeting this evening.

It's very nice to have you with us tonight. We know everyone is pretty busy, and it's nice that you took the time out of your busy schedule to join us this evening, so thank you for that.

What I'd like to do, as is our tradition, is to introduce Joanna Amador. Joanna is actually one of our translators, and we're here to make sure that if anyone specifically needs a specific translation, we wanted to make sure that we provided that as a service. So Joanna, would you mind joining me, and you can make your introduction.

(Whereupon the interpreter addressed the audience, but it was not reported.)

MS. McCORMICK: Thank you so much.

Before we get started this evening, I would

like to introduce to the group our elected officials who have joined us this evening. I'd like to introduce Mr. Adam Ma, who is the senior field deputy for Senator Kevin De Leon who is with the 22nd Senate District. Adam.

Then I'd like to introduce Julianne Hines who is with Assembly Member Portantino's office. It's the 44th District. She is the district director for that. Julianne, thank you.

Then I'd like to introduce Mr. Paul Habib, who is the public project and transportation director for Council Member Jose Huizar's office. Thank you. And then Mr. Diego Martin, and he is with the San Gabriel Valley Council of Governments. Thank you. Thank you for joining us.

Before we begin, I'd like to just review some of the material that you should have received as you came in this evening. And we have two pieces of information. We have the information for the SR-710 conversations and information packet. It has quite a bit of information for you. It actually has a calendar here to show you what we -- actually tonight is the 20th meeting of 20 meetings that we've held in approximately eight weeks. We have a calendar that shows you those calendar dates and locations as well.

And in addition to that, I wanted to point out that we have some contact information for you which is a full page of information if you have any information regarding -- or questions for Metro to make sure that you have that available.

And we are going to be providing you a lot more information on scoping, and if you look in your package you will actually see we had a series of meetings, and this is what we're -- we're calling this scoping, "going on the record," because this is -- these are the important meetings. This is where your comments actually get entered into the Environmental Impact Report. We have a court reporter here this evening. She will be recording every word that we say this evening, and that actually goes into part of the legal document.

There are multiple ways that you can get your comments in. You should -- this is an important piece of paper that you should have received that's a comment card. We have multiple boxes around the room, which means that this evening if you come up with a comment, please fill that out. It's just as valuable as standing in front of the microphone. Anything that's a written document, you can actually fold up, and you can put it in the comment card. You can keep it and not fill it

out. And the information is there. You can actually go home tonight, and you think about something that you might want to say, you can fill it out, and you can mail it in. You have that opportunity.

We have a computer back in the public comment and scoping station back there where you actually can have someone type up your comments for you if you would prefer not to write them, and then we have a multitude of different opportunities.

For the first time we're going to social media, so we actually have -- you can go online; you can register. And we put a virtual meeting together starting on March 21st which went live, which means there's a lot of folks who, in fact, can't get out at night -- they can't drive; it's very difficult for them to get to certain meetings -- so what we've done is, we wanted to make that accessible through the Internet. It makes it easy to register, put your comments online, and it's just as if you were standing here and standing in front of the microphone as well.

So without any further ado, what I would like to do is introduce Mr. Garrett Damrath. He is with Caltrans District 7, and he's going to be doing an overview this evening of what scoping is and how you can, in fact, participate in a variety of ways.

Garrett.

MR. DAMRATH: Hi, my name is Garrett Damrath, and I'm a senior environmental planner from Caltrans, and on behalf of Caltrans and the Federal Highway Administration, I'd like to thank you very much for coming and attending this evening out of your busy schedule.

The U.S. Council on Environmental Quality defines scoping as an early and open process for identifying important issues related to a proposed action. That was in 1978, and back then its application was a very agency-oriented process. Over the years the public input has become a more important process, more important element of the process. And now in the 21st Century, we've had 21 meetings for the public and only one for the agencies. So the scoping process is very flexible, and we want to ensure that everyone knows that we have made no decision at this point, and we're really generally just gathering suggestions, and I'll tell you all about those suggestions as to how we want to gather them.

So why are we here? The previous studies have indicated that the SR-710 gap contributes to a growing congestion on nearby freeways and arterials, and that was a part of a 1998 Record of Decision. The Record of

Decision in 2003 was rescinded, and continued development on the project was prohibited without new environmental work. In November 2008 Measure R was passed by a two-thirds majority of L.A. County voters. It was a ballot initiative to support a half cent sales tax increase for 30 years to improve transportation throughout the county including the SR-710 gap. And then the Metro Board has adopted motions to move forward with the environmental phase.

Scoping for solutions -- we have convened a series of 20 public meetings. We are providing engaging and instructional dialogue and maintaining an open and transparent process. We are soliciting broad participation and input, and we facilitate and continue the SR-710 conversations through social electronic media platforms.

So the purpose of scoping is to identify issues to be addressed in the environmental documents. The lead agencies for this project will be Caltrans for CEQA, and as delegated by the Federal Highway Administration, we are also the NEPA lead agency. We would like to receive all written comments by April 14th, 2011.

So your role in scoping -- when do we want everyone to begin in the scoping process? Very early in

the EIR/EIS process, and that's why we're doing it right now. Who do we want these comments from? We want them from the public and also the federal, state, and local agencies. And what do we want these comments to consist of? We would like to identify potential alternatives, issues, and impacts to be analyzed and the level of detail in those analyses. And how do you provide those comments? We are giving an opportunity this evening to provide oral testimony and/or written comments in a number of different ways, and we want you to get on the mailing list and please stay involved through the process.

This is our project study area. It is basically the entire San Gabriel Valley from the 605 in the East, to the 5 and 2 in the West, the 210 in the North, and the 10 in the South.

Our preliminary project purpose and need -- improve regional mobility and accessibilities for the movement of people, goods, and services; reduce circuitous out-of-direction travel on the network; reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips; improve regional travel-time savings and thereby reduce loss of productivity associated with the congestion; provide additional connectivity in the

regional network for use by public transit; improve regional and local mobile source air quality characteristics; reduce greenhouse gas emissions from mobile sources; provide a project that constrains impacts in local communities to acceptable levels; and to develop a financially feasible project taking into consideration cost effectiveness and viable funding strategies including public/private partnerships.

Our project alternatives at this point are route neutral surface and subsurface highway or freeway; heavy passenger and freight rail improvements; bus and light rail system improvements including the first and last mile; local street upgrades including signal synchronization, pedestrian and bike access improvements; traffic management systems; and the no-build alternative.

Some of the new factors that we're considering on the project are the multimodal transportation landscape; emerging environmental issues and advances in technologies; potential funding and revenue sources; and project delivery and procurement methods.

Some of the project milestones -- the public outreach which began previous to the scoping meetings, and it's still going on. We issued the Notice of Intent and the Notice of Preparation and are holding public

scoping meetings now. This is the last of 20 of them. The completed Draft EIR/EIS will be the next step and then hold public hearings on that draft and collect comments. Prepare a Final Environmental Impact Report/Environmental Impact Statement, and then prepare and approve a Record of Decision and a Notice of Determination.

As I mentioned, under CEQA, which is the California Environmental Quality Act, the environmental document is called an Environmental Impact Report, and under NEPA, which is the National Environmental Policy Act, we are preparing an Environmental Impact Statement.

So for project comment or comments, project contact for comments and important inclusion on the mailing list, please contact Ron Kosinski, deputy district director, division of environmental planning, Caltrans. We have his address over here on the card. It's also in your hand-out packages. And we would like to get any written comments by April 14th, 2011.

And once again, I'd like to thank you very much for your interest in this important transportation project and for taking the time out of your busy schedule to participate. Thank you.

MS. McCORMICK: Thank you, Garrett.

In the CEQA/NEPA package that you have, we

actually have created a CEQA and NEPA process flow chart. So if you have any questions on that, there's also in addition to that, you have the frequently asked questions, so that is something that we wanted to make sure that you had if you have any questions.

So now, what we're going to do is we're going to offer up an opportunity for people to come up and go on the record. So what we'd like to do is invite -- I have some speaker cards here. If you have not filled out a speaker card or if you would like to fill out a speaker card, we actually have staff that can make sure -- if you raise your hand, that can give you one. Would you like one? Would you mind, Mike, getting one for this gentleman here? Thank you. And we'll be happy to put you in our list.

One of the most important things that we need from you this evening is we actually need your name and your address. Your address is really important because it is what we need to make sure it goes into the record. So when you come up to speak, please speak clearly and give us your name and your address as the court reporter will be putting it in the record.

So we have a timer, and everybody gets two minutes, and we'll make sure that everybody gets a chance to speak. The timer will go off at -- at 30, and

then it will go to yellow, and you will have at that time 20 to 30 seconds left, and then when it goes to red, you have about 10 seconds or so. And we just want to kind of give you an idea of it so we can be fair and make sure everybody gets the chance to have the same amount of time.

So the first person that I'd like to introduce and to have come up is Dominik Weber, and then after Dominik, we'd like to have Trish Gossett come up. Thank you.

Go right ahead.

MR. WEBER: Hello, everybody. My name is Dominik Weber. I live in 3415 Dorchester Avenue in El Sereno, California 90032.

I am a U.S. citizen and a homeowner in El Sereno, and I am here because it is clear to me that affected people of El Sereno are kept in the dark. In fact, out of the 20 meetings, none of the people in my street has heard about them until this Sunday.

I believe that the only practical route is route number three with the south terminus in El Sereno with a railroad bridge or by ground-level freeway with a portal at the HDI, resulting in a large area and a large negative impact. In fact, I do live two blocks from that route. If people so affected are designated

low-income -- and are not being informed at all. Obviously, every yard that gets built not underground will save millions. If this blackout does continue, we're going to peacefully mobilize and explore all legal avenues.

Now having said that, I do support the public transportation and the freeway system, but it needs to be done in a fair way. That's it for me right now. Thank you very much.

MS. McCORMICK: Thank you. Thank you, Dominik.

Trish Gossett, and then after Trish, Sam Burgess, please.

MS. GOSSETT: Hi. I'm Trish Gossett. I'm a resident here in Highland Park. I'm a member of the neighborhood council here, and thank everyone for coming. It's been a couple of years, I think, since we had anyone from Metro or Caltrans give any kind of presentation here.

And welcome to zone two, everyone. That's what we were considered here in Highland Park and Eagle Rock a couple of years ago. We were zone two, and I notice that we're really not on the chart anymore, so I wanted to just quickly make sure that Eagle Rock and Highland Park are included in this study as we go forth in the scoping process. Thank you.

THE REPORTER: Address, please.

MS. GOSSETT: 1842 Phillips Way, Los Angeles, 90042.

THE REPORTER: Thank you.

MS. McCORMICK: Thank you.

Sam, and then after Sam, Janet Ervin.

MR. BURGESS: Good evening. My name is Sam Burgess, 626 Prospect Avenue, Number B, South Pasadena. And I'm not new to this area. My seven brothers and sisters and I attended Loretto Street, Nightingale, and Franklin for all of you that live in this area, so I know it quite well.

I would like to remind you of what was said earlier by Garrett and Mary that you should ask your questions tonight. It has been a very long process for all of these people, and they're going to have a big blow-out party tonight and they're going to be hungover for the next few days, so you won't be getting any answers from them.

MS. McCORMICK: You're invited.

MR. BURGESS: I was hoping you'd say that.

The EIR/EIS must analyze and provide justification that, indeed, the South 710 and North 710 projects are separate, not interrelated, and that one does not impact the other. I would like to quote from

Orinda versus Board of Supervisors, 1986. Orinda is spelled O-r-i-n-d-a. Quote, "A public agency is not permitted to subdivide a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole," unquote.

And for those of you who do not understand what I just said, is that there are actually two projects on this Long Beach freeway. One is known as the South 710, and one is known as the North 710. The South 710 is a widening project. They want to go from four lanes in each direction to six lanes in each direction. The North 710 is the one that we're here discussing this evening.

However, all of that truck traffic is going to travel the entire distance, but Caltrans and Metro has segmented -- they have taken the south 710 from Long Beach just to the 60, and they stopped. And then they jumped up to the 10 freeway and begin there with the north 710 and continue on when, in fact, it should be listed as all one project because no matter what happens in the south end is going to have a detrimental effect on the north end, and what happens in the north end, meaning this area, it's going to have a detrimental effect on the south end. Thank you.

MS. McCORMICK: Thank you, Sam.
Janet, and then -- thank you -- Mr. Jim Kiehl.
MS. ERVIN: My name is Janet Ervin. I live at 801 Meridian Avenue in South Pasadena.
I have a number of things written down here that I want to make sure get covered in the study. I want to know how six lanes of traffic on the south 710 will manage to get into four lanes in a tunnel, and I want to know where all the spillover traffic will go. I want to know how collisions and fires in the tunnel will be handled. What will happen to people trapped in the tunnel in the event of a collision? I want this study to include all of the ramifications of insufficient tolls being collected.
One of the things that's being considered is public/private partnerships which means the public puts up some money, but private companies put up most of the money at the beginning in the hopes of collecting tolls on their investment. Toll tunnels in other places have not panned out. The tolls were insufficient, and taxpayers had to foot the bill. So I really want to know how they intend to make it work here. And I want to have the cost of the study of construction, maintenance and -- of all alternatives to determine the cost effectiveness and environmental impacts of each

alternative.
In the first series of meetings that I attended, we sat down with people from the various cities, and everybody said that they wanted to reduce traffic in their communities, and they wanted to minimize or reduce the pollution that comes from that traffic. Virtually everyone said they wanted alternatives to auto travel. People are driving in their cars because they have no choices. They can't get to work any other way, or they can't get to go shopping and so forth. What was stressed was connectivity. A tunnel only provides for automobiles and trucks. How many miles of light rail can be built for $12.8 billion?
MS. McCORMICK: Thank you.
I'd like to also mention that we are here tonight at the request of Councilman Huizar, and he wanted to make sure that we had a meeting here for this community. So I was asked to mention that to you this evening so that you would know.
So Jim, please join us, and then after Susan -- after Jim, Susan Bolan.
MR. KIEHL: Good evening. My name is Jim Kiehl. I -- my address is 3750 Verdugo Road, Glassell Park, 90065. I want to comment on fuel efficiency for trip freight transport.

In general, most people would prefer less fossil fuels be burned near where they live and work. Studies have shown that fuel used to haul a ton of freight one mile is approximately 35 to 40 percent more efficient when done on a train than when it's done on trucks using diesel fuel vehicles for each of these modes of transport.
The primary reasons for the significant difference are, A, wind resistance of a train with many containers is far less than with trucks with one or two containers; and, B, a clear guide path of a train versus encounters with traffic on our roadways for trucks. In general, it's believed that diesel engines for both trucks and trains will improve over time.
However, the primary reasons for the train's advantage over the trucks will continue over time. I mean, you think there will be no traffic five years from now? I don't think anybody thinks so. At any rate, thus over time less fossil fuels will be burned in the Los Angeles Basin if we as a society move away from truck use to train use for our freight hauling. This could be a significant improvement in the quality of life in the Los Angeles Basin. We should discourage truck use with our future transportation projects.
Given limited funds available for transit

projects, we should not build the 710 extension but invest in relieving bottlenecks to our existing rail system and improve the capacity of our rail system. This will take away much of the future demand for additional capacity on our freeway system. Thank you.
MS. McCORMICK: Thank you very much.
Susan Bolan, and after Susan is Marino Pascal.
MS. BOLAN: Hello. I'm Susan Bolan, 3528 Prospect Avenue, La Crescenta, also known as North Glendale, 91214.
I've learned a lot about tunnels in the last two years which has become kind of a pet project of mine to figure out what Caltrans and Metro are doing and try to figure what is the best alternative to the tunnel. But I've learned a lot about tunnels, and first off is that they're extremely expensive. We're talking billions of dollars when our state and our local area is really hurting for money. I don't think, even with a private partnership -- public/private partnership, we can afford such a tunnel.
I've also learned that they have gigantic concrete structures at either end called portals. You know, a lot of people say, well, a tunnel is less evasive than surface route, but you have to dig the earth out deep -- you know, 150 feet at least for these

structures, and occasionally along the route you also have ventilation structures. They go about 150 feet up in the air. And how would you like to have that next to your house or your hospital or nearby, and the air that comes out of those structures emits concentrated particulate matter? So it is a concern to the community.

And then, you know, we're talking big expense. The big dig tunnel in Boston is a perfect example of a tunnel that was bid at $2 billion, and the ultimate cost is around $22 billion, and so there is a discrepancy oftentimes of what the bid is and what the final result is.

And even with that $22 billion, the big dig tunnel still had shoddy workmanship. There was all sorts of issues -- glue that was holding up the ceiling panels fell down on some of the cars, and there was a woman killed. But that's not the only problem that happens with tunnels. Fires are an extremely big concern.

I was just getting started.

MS. McCORMICK: Thank you.

Marino Pascal, and then Nancy Wyatt, please.

MR. PASCAL: Hello, my name is Marino Pascal, and I live at a 2525 Crestmoore Place in Glassell Park.

I've lived in the area for 25 years. I came here on a bicycle.

I have been opposed to paving upper South Pasadena for a long time. And like, since 20 years ago I thought the only sensible solution would be to dig a tunnel, and go under the city center rather than paving it over. (Unintelligible.) Normally I don't support more freeways. It's just that the 710 -- it's a freeway that's 97 percent done, and we need to connect those last four miles -- or whatever it is -- because otherwise all the existing traffic comes through the 110, the 5, the 2, and impacts our community. That's all.

MS. McCORMICK: Thank you.

Nancy Wyatt, and then Mark Vallianatos is next. Right here, Nancy, right here.

MS. WYATT: Right there.

MS. McCORMICK: Name and address, please.

MS. WYATT: Nancy Wyatt, 754 North Avenue 50, Highland Park.

I would like to thank the powers that be that they finally remembered us. We are the 17th at the last meeting of 17. And there are nine different communities that have had up to three and four meetings, and we only got this one at last. And for the record, I would like

that to be stated, please, so that we don't get forgotten again.

I also agree with the statements that have been said already, and I see our community if the second plan were to be adopted, we would suffer greatly from the construction that's going on in our community, and we have nothing to gain from it. However, I do think there are other ways of ameliorating the -- this transportation problem.

So please don't forget Highland Park. We have a voice, and we want to be heard. Thank you.

MS. McCORMICK: Thank you.

Mark, and then Liz Herron.

MR. VALLIANATOS: My name is Mark Vallianatos, 195 South Wilson Avenue, Apartment 29, in Pasadena.

And I focus comments on alternatives to the freeway tunnel. First, I think agencies should spend transit in the area. It is the best way to ultimately reduce congestion by reducing car use, and I believe they should, first of all, accelerate the extension of the Foothill and the east side, combine the site to the east part of the San Gabriel Valley, do north-south bus routes as they are exploring in the San Fernando Valley, and consider light rail link between Pasadena through Eagle Rock up to Glendale and Burbank and down to North

Hollywood terminus -- the Red Line.

Second, they should improve the streets and the major arterial streets in the area to make them safer for walker and bikes.

Third, I believe instead of extending the 710, they should remove the final miles of the 710 when it goes past the 10 as other cities are doing to remove freeways and turning them into parks or boulevards so you eliminate part of the problem of the traffic spilling out on surface streets.

Finally, I think that you should reduce freight truck traffic as was previously expressed, focus on on-dock rail at the Ports of Long Beach and Los Angeles and avoid use of trucks which have an EPA recent study found about six times the externalities of train traffic. So there is a lot more pollutants per volume of freight being moved.

And finally, I would encourage that along with an environmental review, a health impacts analysis assessment is done of this project as is currently being done on the south portion of the 710. Thanks.

MS. McCORMICK: Thank you.

Liz Herron, and then after Liz, we'll have Scott Piotrowski. And after that, I have one more speaker card, so if there's anyone else who would like

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to speak, let us know.
Thank you. Go ahead, Liz.
MS. HERRON: Hi, my name is Liz Herron. I'm 935 West Avenue 37, 9, double 0,65.
I'd like to really expound more on alternatives because I don't think an Environmental Impact Report will be able to render the impacts of this particular tunnel or surface extension of the 710 freeway without gross significance. I don't think there is a way to get rid of those environmental impacts or ameliorate them. So what do you do?
I know part of the pressure to build this has to do with moving freight traffic up the -- out of the Alameda Corridor. So I think it's very important to work on those linkages so that we're able to go from the Port of Los Angeles to the Alameda Corridor out to other hubs without loading our freeways with cars. Because even if we connected this up, it would just load up all of the overburdened freeways. I mean, how do we move away from fossil fuels? Rail, other alternatives.
And I'd really like to also agree that we need to look at what do we do to improve the transit options, so that we don't really have -- so we have a choice rather than to use our cars. Thank you.
MS. McCORMICK: Thank you.

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Scott, and then after Scott, Nat Read.
MR. PIOTROWSKI: My name is Scott Piotrowski. I live at 2456 Sundown Drive, Glassell Park, 90065.
I basically have understood that the comments that are in this meeting tonight are the ones that need to be addressed in an EIR and must be addressed in the EIR. Therefore, I am basically going to list a bunch of issues that I feel Caltrans and Metro needs to attend to in the EIR process.
First of all, we need to address financial issues for health mitigation for the residents that would be affected by any tunneling construction process and long-term health effects of the portals and any ventilation shafts that are built, no matter which zone the tunnel might be built in. We need to address transportation issues in terms of moving freight from the Port of Long Beach and Los Angeles to the end construction and already constructed warehouse shipping centers that are in Kern County, which means Kern County needs to be addressed in this issue in addition to Los Angeles County. Therefore, we also need to address high-speed rail and its north-south corridor and how we can address moving freight into that same corridor with high-speed rail.
We need to address more mass transit in the

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form of not only the Gold Line but also potential north-south extensions of light rail to connect both eastern extensions of the Gold Line as it currently exists. This should also include all future mass transit projects within all of Metro's design area. Thank you.
MS. McCORMICK: Thank you.
Mr. Nat Read, and then Warren Christensen.
MR. READ: Hello. My name is Nat Read. I'm with the 710 Freeway Coalition. That is a paid position.
I'm happy to be in Highland Park this evening. For five years I was a cop on the streets, and this brings back such memories of community meetings here in Highland Park. I was also very involved in the Gold Line construction. That project was killed by the MTA, and a group of us, a small group, fought to resurrect it and complete it. I'm proud of my role in that. I ride with the Gold Line, and I hope that all of you do too.
It's loony for to consider the 710 coming through in terms of Highland Park or Glassell Park. There are two stubs, and the logical route is connecting the two stubs.
As much as I'm a rail guy and a rail fan, we have to have a multimode transportation system here.

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Freeways play an important role that simply can't be assumed by rail. The people in the 14th District of Los Angeles favor completion of the freeway by a margin of over 2 to 1. That's a documented survey. That should be noted.
There is a regional need to complete the freeway, not only for our generation but for our children and our grandchildren because population will continue to grow, and we're fixed -- we have a fixed freeway system, and we must leave a legacy for our children and our grandchildren. Thank you very much.
UNIDENTIFIED SPEAKER: We are required to give your address as you go.
MS. McCORMICK: Yes, would you, please?
MR. READ: Oh, I'm sorry. I'm sorry. Nat Read, 100 East Corson Street in Pasadena.
MS. McCORMICK: Thank you.
Warren Christensen, and then Susan Rocha.
MR. CHRISTENSEN: Warren Christensen, 935 West Avenue 37, Los Angeles, California 90065.
I was very involved in a lot of the discussions that went around the Alameda Corridor back in the '70s, and that particular program to move freight from the ports into the rest of the country through Los Angeles was designed to alleviate the truck traffic on the 710.

They did complete that under the Bradley administration, and this all -- this is the way it's been working ever since. It was designed to do what it's doing, taking the -- the containers and all of the deliveries on rail and distributing it to the rest of the country.

Because of this, I believe that it's probably unnecessary to have the completion of the 710 freeway north for the purpose of truck traffic. It's actually -- I don't know what the statistics are; I haven't researched them lately -- but I do know that the Alameda Corridor was designed as rail to take care of that problem, and it does it very nicely.

Therefore, if you're going to do anything about a tunnel or obviously South Pass has done quite nicely with their houses to keep them intact by not allowing the freeway to go overland, perhaps they should start discussing what we have here, going through our community with the 1942 freeway, called the Pasadena Freeway, which does not allow trucks on it at all. Now we know that that is the case because it is rail freeway, and it wouldn't handle it very well. It wasn't designed to do so with all of its curves.

However, I don't see why they cannot consider keeping truck traffic off of this new -- if they're going to continue with it either as a tunnel or a

freeway or whatever -- no trucks.

MS. McCORMICK: Okay. Thank you.

Susan.

MS. ROCHA: My name is Susan Rocha.

MS. McCORMICK: Your address, please.

MS. ROCHA: It's 3314 Idell Street, L.A., 90065.

MS. McCORMICK: Thank you.

MS. ROCHA: I'm totally against the 710 freeway coming through. I'm also totally against a high-speed rail coming through because those of us that have lived near the rail lines now hear the trains go by all day and all night. The people that get it the worst are the people living in the Elysian Valley because the train horns are very loud, and like I said, they are all day and all night long.

I've asked council members to do something about the train horns, but that falls on deaf ears. There are things that can be done. There are quiet zones that Pacific -- Union Pacific can put in, but they have to be asked by city council members. And that has fallen on their deaf ears.

So more trains coming in are not a good thing unless we can see how they're going to affect us. If they're going to run down South Fernando Road which is

feet from our houses, or if they're going to somehow get all the trains so that the horns don't blow all the time and interrupt all of our lives.

Now, people on this side of Highland Park don't understand or may not understand the effect of trains coming right next to your home and having the freeway right next to your home, so that's where I'm at. I'm saying no extension and no high-speed trains and no more rail. Thank you.

MS. McCORMICK: Thank you.

That was our last speaker card, and I'd like to just open it up one more time if anyone else would like to speak? Okay. Yes.

UNIDENTIFIED SPEAKER: Is it possible to ask questions about this project?

MS. McCORMICK: Actually what we can do is we have all of the different stations open, and there will be Caltrans and Metro staff that can actually help you with some of your questions.

We will keep everything open. I'll keep the whole meeting open for comments for the next 15 minutes. If anybody wants to do that, we will be happy to enjoin them. So please make yourself available to the stations and have a lovely evening. Thank you for coming.

(Pause in the proceedings.)

MS. McCORMICK: Ladies and gentlemen, we have one more speaker who would like to speak tonight. So if I can have your attention, please, we'd like to have someone go ahead and put their comments into the record.

Excuse me. Hello. Could I have your attention, please? Thank you. We have a gentleman here, and the comment period is still open, so we have a gentleman here who would like to talk to us.

Carlos Cordon, go ahead.

MR. CORDON: Thank you. So I was hoping to get some comments in. First, I want to say thank you --

THE REPORTER: Your name and address.

MR. CORDON: Carlos Cordon, spelled C-a-r-l-o-s; last name is C-o-r-d-o-n, 1829 Scott Avenue, S-c-o-t-t A-v-e-n-u-e.

Okay. So with that, I would like to draw -- you know, first I'd like to say thank you for everyone who worked on both the route 710 tunnel technical feasibility assessment report and also the final geotechnical summary report, the SR-710 tunnel technical study. I was able to read through most of both documents, and I wanted to make sure that in the steps that lie ahead with regard to the Environmental Impact Report and Environmental Impact Study, that will eventually come from everyone's efforts in this project,

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we take into account that the route 710 tunnel technical feasibility assessment report actually in Section 6.6 under tunnel ventilation system facilities, you know, reads that the ventilation --

MS. McCORMICK: Just a moment, Mr. Cordon.

Excuse me. May I have your attention, please? We have someone who is doing some comments, and we'd like to be able to hear him. So if I may ask you to be quiet for just about two minutes, I'd appreciate it. Thank you very much.

Go ahead and continue, sir.

MR. CORDON: Thank you. You know, I think that the eventual construction of the tunnel will require ventilation buildings both in the northern and southern portals and one at the midpoint location. Now, if you construct something -- just take zone three from the -- at the 6.3, Chapter 6 from that thing, Route 710 Technical Feasibility Assessment Report, you'll find that, you know, in the southern entrance of the tunnel in zone three you know you're over in the El Sereno area. In the northern entrance you're over in the, you know, Del Mar -- Huntington Hospital. But right in the middle where, according to the report, you have to put a ventilation shaft, you're putting a ventilation shaft right next to a high school. If you don't put it next

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to the high school, you put it next to a junior high school. If you don't put it next to a junior high school, you put it next to an elementary school. And I would hope that there is some consideration given to where the ventilation shafts will be constructed because I think that that is something that we should give serious consideration to.

I know that from the final geotechnical summary report, you know, there is a requirement for fire light safety to exist within any highway tunnel that is constructed. If you look at other, you know, highway tunnels that have been constructed in other parts of the world, like the A86 in Paris, you find that 3,280 feet or so, you will find you have to put some sort of a shaft there, and that I just think these are all things we need to get some serious consideration to, both in the EIR and EIS.

If that's possible, you know, we should identify within all five zones where exactly those ventilation shafts will be constructed and if, where they're constructed affects schools and their parks, to give serious consideration to moving them and/or not having them anywhere near, you know, schools or parks.

So I would hope that that's taken into account. I think that's a -- there's been a lot of good work

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that's done from both studies, and they are lengthy documents, and I thank you for everyone who was involved with that. I hope that this is something, as we move forward, we take serious consideration to, and we take every step necessary to either mitigate, minimize, and/or, if possible, eliminate. Thank you.

MS. McCORMICK: Okay. Thank you very much. Thank you for your attention.

Thank you, everyone. We're officially closing the comment period, but you're welcome to stay for the other scoping and other stations. But we are officially closing the comment period as of right now. Thank you.

SR-710 Conversations – A Series of Information Meetings

WEDNESDAY, APRIL 6, 2011

NAME: SUSAN ROCHA

ADDRESS: 3314 FIDELL ST. CITY: LA ZIP: 90065

REPRESENTING: SELF

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

Traffic. NO 710 Freeway Extension!

NO HIGH speed TRAIN!

NO NOISE!!

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

WEDNESDAY, APRIL 6, 2011

NAME: PETER LUCEI

ADDRESS: 1250 N. WILSON A CITY: PASADENA ZIP: 91104

REPRESENTING: SELF

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

PLEASE SEE COMMENTS ON REVERSE

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

WEDNESDAY, APRIL 6, 2011

NAME: NANCY WYATT

ADDRESS: 754 N. AVENUE 50 CITY: LA ZIP: 90042

REPRESENTING: HIGHLAND PARK ADVOCATE

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

FOR THE RECORD

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print):

THANK YOU FOR FINALLY REACHING HIGHLAND PARK AS THE LAST OF 17 MTGS. 9 COMMUNITIES, SOME W/ 3 & 4 MTGS – H.P. HAS ONLY ONE MTG! I WANT YOU TO KNOW THAT THERE ARE TWO EQUALLY IMPORTANT MEETINGS (THE LAST) 6-8 YORK BLVD VISION MTG BEING HELD TONITE AT EXACTLY THE SAME TIME. THIS SHOULD BE ~~NOTICED~~ NOTED IN THE ATTENDANCE RECORD!

CONSTRUCTION IMPACT ON COMMUNITY WITH NO TRADE OFF ADVANTAGE FROM THE INCONVENIENCE

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

I AM FOR SHIPPING FREIGHT BY RAIL – ENVIRONMENTALLY, MUCH HEALTHIER COMPARED TO TUNNEL VENTILATION. NW

Metro Caltrans

SR-710 Conversations – A Series of Information Meetings

WEDNESDAY, APRIL 6, 2011

NAME: ELIZABETH HERRON

ADDRESS: 935 W. Ave 37 CITY: LA ZIP: 90065

REPRESENTING: SELF

Please drop comments in the Comment Box or:
Mail to: Ron Kosinski,
Deputy District Director
Caltrans District 7
100 S Main St
Los Angeles, CA 90012

Comments related to topics covered in Series 1, Series 2, and Series 3 meetings (please print): E.I.R. SHOULD INCLUDED TRAIN EXTENSIONS ONLY

Regest that E.IR. INCLUDE, moving alameda corridor, freight from port of Los Angeles, WITH IMPROVED FREIGHT TRAIN LINES, & IMPROVED Light rail connectivity. No Big Tunnel, no surface extention OF THE ROAD, NO MORE RAIL & ALTERNATIVE TRANSIT ONLY

Note: Comments specifically for scoping will be accepted into the official administrative record until April 14, 2011.

Metro Caltrans

E-9 – Virtual Meeting

The next meeting is at your house...

SR-710 Conversations Online Open House

A VIRTUAL MEETING HOSTED BY METRO AND CALTRANS

BEGINS LIVE MARCH 21, 2011 AT 6PM -
ON DEMAND THROUGH APRIL 14, 2011

Metro

Don't miss the SR-710 Conversations Online Open House

SERIES 3: SCOPING – GOING ON THE RECORD

LIVE MARCH 21, 2011 AT 6PM
ON DEMAND THROUGH APRIL 14, 2011

Go on the record from the convenience of your home.
Register at metro.net/sr710conversations

You can also attend meetings in person.
Visit our website for a complete list.

facebook.com/sr710conversations
twitter.com/sr710convos
sr710conversations@metro.net
metro.net/sr710conversations

Appendix A. Section 2. Scoping Comments Received via Online Open House Presentation Room

Presentation Comments for Scoping (8)

Date	First Name	Last Name	Email	Company	Address	City	State/Province	Zip/Postal Code	Message
3/21/2011 6:23:31 PM	karl	guder	kgguder@gmail.com		1967 Nolden St.	Los Angeles	California	90041	I really think the 710 connection needs to be completed, and I was in favor of a portion being tunnel. However, given the recent tragedy in Japan, is that still a feasible option?
3/21/2011 6:26:50 PM	Peter	Orona	porona1060@aol.com		5472 Allan St	Los Angeles	California	90032	In regard to the 710 Tunnel, what would it take to construct the southern portal between the 60 Frwy (Pomona), and the 10 Frwy (San Bernardino)? Can Freeway Interchanges be reconfigured? If yes, then would it be possible for the southern portal to begin just before the 10 Frwy. Can a tunnel be contructed to go underneath the San Bernardino Frwy? Thank you, Peter Orona
3/21/2011 6:26:59 PM	Leo	Dimante	leoness001@gmail.com	Retired	1629 Fremont Ave.	So. Pasadena	California	91030	i live in south pasadena and I am tired of congestion on fremont ave. I support some kind of solution, especially a tunnel. because it won't disturb the beauty of this community. IF a tunnel is built, what will this do to the local air quality and how will you determine wher to build the ventilation system?

3/21/2011 6:27:05 PM	Tsai Yi	Chan	tsaiyi.chanbeal@gmail.com		160 Arlington Dr.	Pasadena	California	91105	THANK YOU FOR THIS OPPORTUNITY TO OFFER A PUBLIC STATEMENT.MY HUSBAND AND I OWN A HOME ON ARLINGTON DRIVE BETWEEN PASADENA AVE AND FAIR OAKS. I'M A DESIGN CONSULTANT AND MY HUSBAND IS A SOFTWARE ENGINEER. WE BOUGHT OUR HOUSE FOR THREE QUARTER MILLION LESS THAN A YEAR AGO. MY COMMUNITY IS BORDERED BY COLUMBIA IN THE SOUTH, CALIFORNIA IN THE NORTH AND BETWEEN ORANGE GROVE AND FAIR OAKS. EVERY MORNING I HEAR PARENTS TAKING THEIR CHILDREN TO A NURSERY RIGHT ACROSS FROM OUR HOUSE. ABOUT THREE BLOCKS NORTH OF US IS SEQUOIA ELEMENTARY, ONE BLOCK WEST OF US IS MAYFIELD SCHOOL. WE HAVE TWO PARKS. SINGER PARK AND ARLINGTON GARDEN, A BEAUTIFUL WATER-WISE GARDEN MAINTAINED BY DEDICATED VOLUNTEERS.
3/21/2011 9:36:17 PM	Peter	Orona	porona1060@aol.com						In regards to tunnel scrubber technology, is there a list of contaminants that scrubbers will remove and a list that the scrubbers will not remove? What kind of contanimant management will be used; dispersion containment, or removal containment?
3/21/2011 9:38:44 PM	Peter	Orona	porona1060@aol.com						What data is there on the effectivness of ESP/Scrubbers on ambient outside air?

3/25/2011 9:17:18 AM	Michelle	Minch	imovemtns@aol.com						I don't think building more freeways is a good alternative to fix current freeway overcrowding. Los Angeles needs better public transportation - trains, subways, buses, etc. However, if the 710 extension is going to built, it should be built in a way that has the most minimal impact on the people living nearby during the building process and once it is built. I think as much as possible should be built underground (tunnel) in order to minimize the impact on surrounding communities.
4/14/2011 12:57:34 PM	Peter	Cooper	drpetecooper@sbcglobal.net	self	825 Flintridge Ave	La Canada Flintridge	California	91011	I would like to go on record opposing any gap closure to SR710. Enough already.
4/14/2011 1:39:47 PM	Barbara	Lott-Holland	barbara@busridersunion.org	Bus Riders Union	3780 Wilshire Blvd Ste 120	Los Angeles	California	90010	The Bus Ruders Union support the No Build options. Expanding the higway will only product more car pollution.

Appendix F – Formal Scoping PowerPoint Presentation

SR-710 North Gap Closure

Scoping Meeting

Reunión de Alcance

Why are we here?
¿Por qué estamos aquí?

- Previous studies indicate SR-710 gap contributes to growing congestion on nearby freeways and arterials (1998 Record of Decision [ROD])

- *Estudios anteriores indican la brecha del SR-710 contribuye al crecimiento de congestión en las autopistas y arteriales cercanos (1998 Record of Decision [ROD])*

Why are we here?
¿Por qué estamos aquí?

- ROD was rescinded in 2003 and continued project development was prohibited without new environmental work

- *ROD fue rescindido en 2003 y fue prohibido continuar con el desarrollo del proyecto sin el nuevo trabajo ambiental*

Why are we here?
¿Por qué estamos aquí?

- **November 2008: Measure R** – 2/3rds of LA County voters approved a ballot initiative supporting a half cent sales tax increase for 30 years to improve transportation throughout the County, including the SR-710 gap

- ***Noviembre de 2008: Medida R*** *- 2/3's de los votantes del condado de Los Angeles aprueban una iniciativa electoral de un impuesto de medio centavo en ventas por 30 años para mejorar el transporte por todo el condado, incluyendo la brecha del SR-710*

Why are we here?
¿Por qué estamos aquí?

- Metro Board adopts motions to move forward with the environmental phase
- *La junta directiva de Metro adopta la moción para mover hacia adelante con la fase ambiental*

Scoping for Solutions
Soluciones de alcance

- Convene a series of 20 Public Meetings
- *Convocan una serie de 20 audiencias públicas*

- Provide engaging and instructional dialogue
- *Proveer un dialogo educativo e interesante*

- Maintain an open and transparent process
- *Mantener un proceso abierto y transparente*

Scoping for Solutions
Soluciones de alcance

- Solicit broad participation and input
- *Solicitar amplia participación y opiniones*

- Facilitate and continue SR-710 Conversations through social electronic media platforms
- *Facilitar y continuar las conversaciones sobre el SR-710 por medios sociales*

- Purpose of Scoping: to identify issues to be addressed in the environmental documents.

- *Propósito de alcance: Identificar temas que serán tratados en la documentación ambiental*

- Lead Agencies:
  - CEQA: Caltrans is the state lead agency
  - NEPA: Caltrans is the delegated federal lead agency

- *Agencias lideres:*
  - *CEQA: Caltrans es la agencia líder para el estado*
  - *NEPA: Caltrans es la agencia delegada líder para el gobierno federal*

- Written comments:
  - Please submit by **April 14, 2011**.

- *Comentarios escritos:*
  - *Por favor envié antes del **14 de abril de 2011**.*

Your Role In Scoping

Su participación en el alcance

When? - Early in the EIR/EIS process.

¿Cuando?- Temprano en el proceso del EIS/EIR

Your Role In Scoping

Su participación en el alcance

Who? - The public + federal, state and local agencies.

¿Quién?- El público + agencias federales, estales, y locales

Your Role In Scoping

Su participación en el alcance

What? - Identify potential alternatives, issues and impacts to be analyzed, and the level of detail in the analyses.

¿Qué? - Identificar alternativas potenciales, temas e impactos que se analizarán, y el nivel de detalle en los análisis.

Your Role In Scoping

Su participación en el alcance

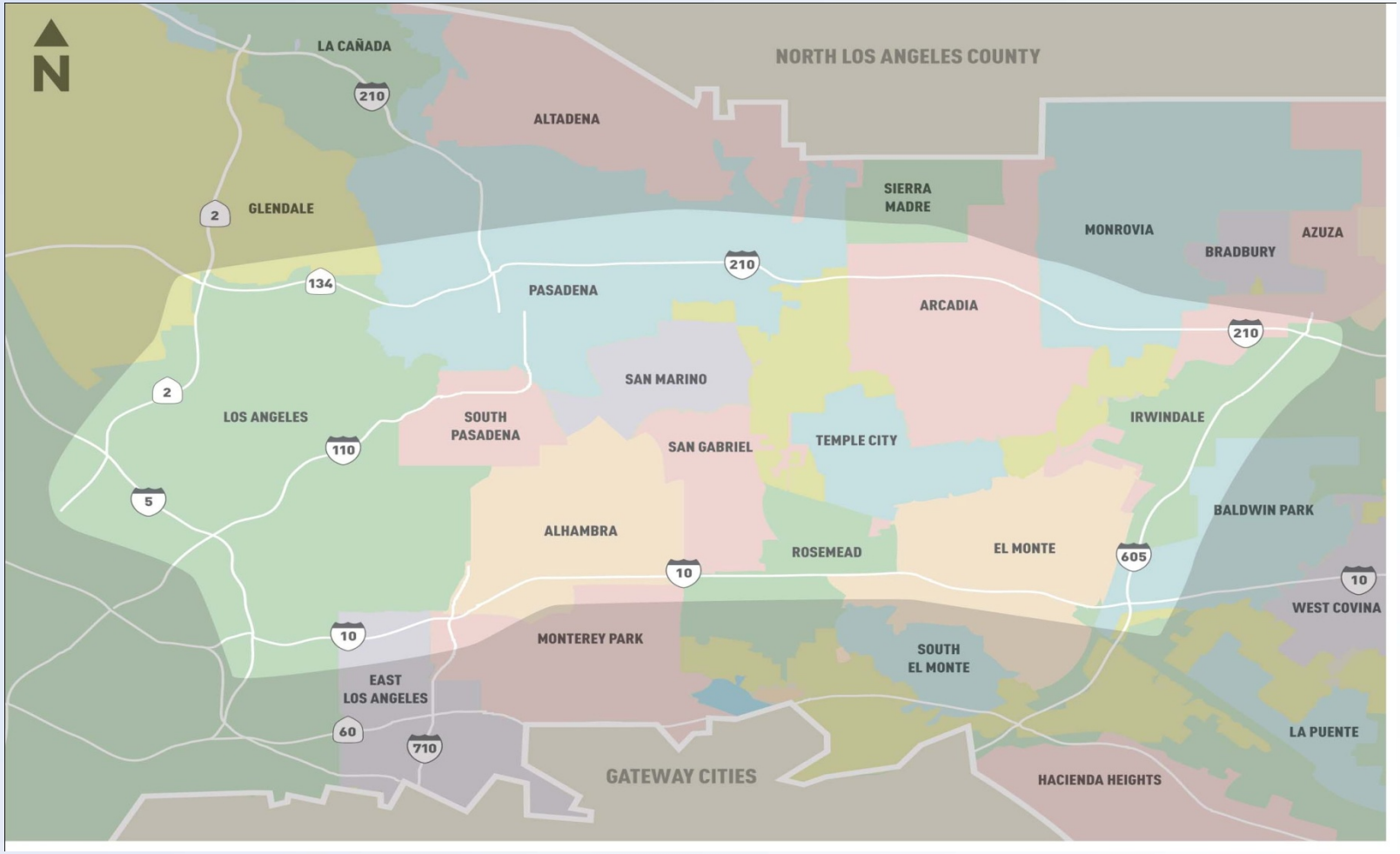
How? - Provide oral testimony and/or written comments, get on mailing list for project updates, and stay involved.

¿Cómo?- Dar testimonio verbal y/o por escrito, inscríbase en listas de correo para recibir información del proyecto y seguir participando.

SR-710 CONVERSATIONS

Project Study Area

Área del estudio del proyecto



Metro

Preliminary Project Purpose & Need

Objetivo y necesidad preliminar del proyecto

- Improve regional mobility and accessibility for the movement of people, goods and services.
- *Mejorar la movilidad y la accesibilidad regional para el movimiento de personas, bienes y servicios*

Preliminary Project Purpose & Need
Objetivo y necesidad preliminar del proyecto

- Reduce circuitous out-of-direction travel on the network.
- *Reducir viajes indirectos que quedan fuera de la dirección del sistema*

Preliminary Project Purpose & Need

Objetivo y necesidad preliminar del proyecto

- Reduce congestion on north-south arterials and local streets currently adversely affected by diversion of freeway trips.
- *Reducir la congestión en las arterias norte-sur y las calles locales que actualmente son afectadas por las desviaciones de los viajes por el autopista*

Preliminary Project Purpose & Need
Objetivo y necesidad preliminar del proyecto

- Improve regional travel time savings and thereby reduce loss of productivity associated with congestion.
- *Ahorrar tiempo y reducir perdida de productividad asociada con la congestión*

Preliminary Project Purpose & Need

Objetivo y necesidad preliminar del proyecto

- Provide additional connectivity in the regional network for use by public transit.
- *Proporcionar más connecciones en el sistema regional para el uso de transporte público*

Preliminary Project Purpose & Need
Objetivo y necesidad preliminar del proyecto

- Improve regional and local mobile source air quality characteristics.
- *Mejorar las fuentes móviles y la calidad del aire.*

Preliminary Project Purpose & Need
Objetivo y necesidad preliminar del proyecto

- Reduce greenhouse gas emissions from mobile sources.
- *Reducir emisiones de gases invernaderos de fuentes móviles.*

Preliminary Project Purpose & Need
Objetivo y necesidad preliminar del proyecto

- Provide a project that constrains impacts in local communities to acceptable levels.

- *Proveer un proyecto que minimiza impactos a niveles aceptables para las comunidades locales*

Preliminary Project Purpose & Need
Objetivo y necesidad preliminar del proyecto

- Develop a financially feasible project, taking into consideration cost effectiveness and viable funding strategies, including Public-Private Partnerships
- *Desarrollar un proyecto económicamente viable tomando en consideración el costo-rendimiento y estrategias de fondos viables que incluyen alianzas público-privadas*

Project Alternatives
Alternativas del proyecto

- Route Neutral Surface and Subsurface Highway/Freeway
- *Ruta neutral de la superficie y del subsuelo hacia el autopista*

Project Alternatives
Alternativas del proyecto

- Heavy Passenger and Freight Rail Improvements

- *Mejorar los ferrocarriles que son mas transitados por pasajeros y transporte de bienes*

Project Alternatives
Alternativas del proyecto

- Bus and Light Rail System Improvements –
  - First and Last Mile

- *Mejorar los autobuses y el sistema de tren ligero –*
  - *la primera y última milla*

Project Alternatives
Alternativas del proyecto

- Local Street Upgrades:
  - signal synchronization
  - pedestrian and bike access improvements
- *Mejorar calles locales:*
  - *Sincronización de semáforos*
  - *Mejorar el acceso para los peatones y biciclistas*

Project Alternatives
Alternativas del proyecto

- Traffic Management Systems
- *Administración de sistemas de transporte*

- No-Build
- *No construir*

New Factors to Consider
Nuevos factores para consideración

- Multi-modal transportation landscape
- *Paisaje multimodal para transportación*

- Emerging environmental issues and advances in technologies
- *Desarrolló de temas ambientales y avances en la tecnología*

New Factors to Consider
Nuevos factores para consideración

- Potential funding and revenue sources
- *Financiamientos y fuentes de recursos potenciales*

- Project delivery and procurement methods
- *Ejecución de proyectos y métodos de contratación*

Project Milestones
Hitos del proyecto

- Public Outreach
- *Actividades y comunicación con el public*
- Issue Notice of Intent & Notice of Preparation
- *Publicación del aviso de intensión y notificación de preparación*
- Public Scoping Meetings
- *Reuniones públicas de alcance*

Project Milestones
Hitos del proyecto

- Complete Draft EIR/EIS
- *Completar el plan preliminar del EIR/EIS*

- Public Hearings
- *Tener audiencias publicas*

Project Milestones
Hitos del proyecto

- Final EIR/EIS
- *Terminar el plan final del EIR/EIS*

- Record of Decision and Notice of Determination
- *Documento de decisión y notificación de determinación*

Environmental Document Type
Tipo de documento ambiental

- CEQA - Environmental Impact Report
- *CEQA – Reporte de impacto ambiental (EIR)*

- NEPA - Environmental Impact Statement
- *NEPA – Declaración del impacto ambiental (EIS)*

Project contact for comments or for inclusion on the mailing list:
Para comentarios o inscribirse en la lista de correo:

Ronald Kosinski, Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 S Main St, MS 16A
Los Angeles, CA 90012

Written comments requested by April 14, 2011.
Comentarios escritos son requeridos antes del 14 de abril de 2011.

Thank you for your interest in this important transportation project.

Gracias por su interés en este proyecto importante de transportación.

Appendix G – Sample Newspaper Ads

metro.net/sr710conversations

SR-710 Conversations

You are invited to a series of Metro community meetings.

SERIES 3: SCOPING - GOING ON THE RECORD

TUESDAY, MARCH 15, 6-8PM
Jefferson Middle School – Auditorium
1372 E Las Tunas Dr, San Gabriel, CA 91776
Served by Metro Lines 78 & 266

WEDNESDAY, MARCH 16, 6-8PM
Alhambra Civic Center Library – Reese Hall
101 S First St, Alhambra, CA 91801
Served by Metro Lines 78 & 176, & Montebello Line 30

MONDAY, MARCH 21, 6-8PM
Online Open house
Participate online at your convenience at 6pm live or on demand at *metro.net/sr710conversations*. This virtual scoping meeting continues through April 14th.

TUESDAY, MARCH 22, 6-8PM
Glendale Community College – Room SC-212
1500 N Verdugo Rd, Glendale, CA 91208
Served by Metro Lines 90, 91 & 685

WEDNESDAY, MARCH 23, 6-8PM
South Pasadena High School – Auditorium
1401 Fremont Av, South Pasadena, CA 91030
Served by Metro Line 260

THURSDAY, MARCH 29, 6-8PM
Los Angeles Christian Presbyterian Church – Gym
2241 N Eastern Av, Los Angeles, CA 90032
Served by Metro Lines 76 & 256, & Dash El Sereno

WEDNESDAY, MARCH 30, 6-8PM
Lake Avenue Church – Skyroom
393 N Lake Av, Pasadena, CA 91101
Served by Metro Gold Line & Metro Lines 180, 485 & 804, & Pasadena Arts Lines 20 & 40

For detailed information please visit *metro.net/sr710conversations*, or call the project hotline at 626.408.2474 or 888.710.GAP1.

Metro

Email: *sr710conversations@metro.net*
Facebook: *facebook.com/sr710conversations*
Twitter: *twitter.com/sr710convos*

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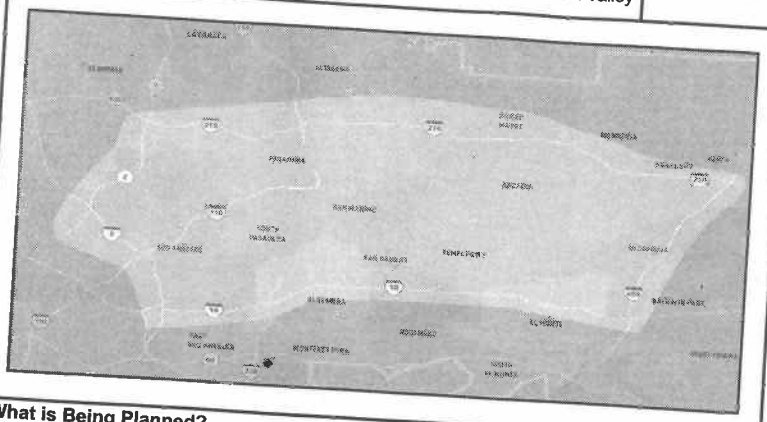
Caltrans

State Route 710 North Gap Closure
Environmental Impact Report/
Environmental Impact Statement
Public Scoping Notice

Seeking public comment on development of plans for improvements on State Route 710 in the San Gabriel Valley

Metro



What is Being Planned?

The California Department of Transportation (Caltrans), District 7, with the Los Angeles County Metropolitan Transportation Authority (Metro) serving as administrative lead, is proposing to examine alternative means to extending Interstate 710 from its existing northern terminus in the City of Alhambra to a new, yet to be determined terminus. Currently there is a gap in the I-710 corridor, which extends between I-10 and I-210. A range of alternatives and modes are under consideration, including No Build.

Why This Notice?

Caltrans/Metro is formally initiating studies for this project. Based on preliminary feasibility studies, the resulting environmental document is anticipated to be an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) and Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act (NEPA).

Your Involvement

The purpose of this public scoping notice is to solicit comments from public agencies, private entities, and interested individuals regarding potential social, economic, and environmental issues related to the project. The Scoping notice also ensures that these parties are involved early in the environmental planning process. If you would like to be added to the project mailing list, please send your name and address to the contact below.

Scoping Meetings

- San Gabriel, March 15, 2011, 6pm to 8pm Jefferson Middle School, 1372 East Las Tunas Drive, CA 91776
- Alhambra, March 16, 2011, 6pm to 8pm Civic Center Library, 101 S. First Street, CA 91801
- Glendale, March 22, 2011, 6pm to 8pm Glendale Community College, 1500 North Verdugo Road, California 91208
- South Pasadena, March 23, 2011, 6pm to 8pm South Pasadena High School, 1401 Fremont Ave., 91030
- El Sereno, March 29, 2011, 6pm to 8pm LA Christian Presbyterian Church, 2241 N. Eastern Ave., 90032
- Pasadena, March 30, 2011, 6pm to 8pm Lake Avenue Church, 393 N. Lake Ave., 91101

Contact

Please submit your written comments by April 14, 2011 to:

Mr. Ronald Kosinski, Deputy District Director
Caltrans, District 7, Division of Environmental Planning
100 South Main Street, MS 16A
Los Angeles, CA 90012
RE: SR-710 Gap Closure

Individuals requiring special accommodations (American Sign Language or other lingual interpreter, documentation in alternate formats, etc.), contact Garrett Damrath at Caltrans District 7 at (213) 897-9016.

Thank you for your interest!

CNS#2050695

MILANO

6th+Grand Ave.

FOR SAL
SWING STAGE WI
ACCESS EQU
HORIZONTAL TROLLEY SY
EXCELLANT SHAPE USED
CONSTRUCTION STARTED
TO ASSEMBLE. MUST H
PARAPET AT LEAST 3 FEE
FOR INSTALLATION. FLEXIB
WILL GO ON ANY HIGH RIS
PICTURES. EVERYTHING O
READY TO MOVE.
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(714) 719-4614

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Enterprise Program for
Public Works. Interested
623-9899 X104.

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