



Date: January 9, 2015

To: Beyond the 710 (BT710) Project, Connected Cities and Communities (C3) Organization

From: West Pasadena Residents' Association (WPRA)

Subject: Areas of Concern and Recommendations Relative to the BT710 Proposed SR-710 Project Alternative

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

The WPRA fully supports the Connected Cities and Communities (C3) purpose and goal to bring together cities, organizations and residents that are significantly impacted by the proposed SR-710 Project, so that they can work together to develop a meaningful alternative to the proposed SR-710 tunnel. We firmly believe there are environmentally responsible alternatives to solving regional transportation needs, including for the communities that lie along or near the tunnel route – East Los Angeles, El Sereno, Alhambra, South Pasadena and Pasadena. The release of a baseline Beyond the 710 (BT710) alternative on May 28, 2015 was an excellent preliminary step towards this purpose and goal. Appropriately, it builds on the previous efforts of key individuals and organizations that have been active in developing a community-based alternative.

The WPRA has reviewed the BT710 alternative provided online at the Beyondthe710.org website. Our initial comments were briefly discussed with BT710 leadership and later with Paul Moore of Nelson Nygaard on November 5, 2015. This resulted in several changes to the BT710 website. For example, the 48-story building at the 210 'stub' in Pasadena was removed – your immediate response was appreciated. However, other WPRA comments were either partially incorporated, or incorporated in a manner that is not consistent with our concerns and/or may cause confusion to the public. We have documented these concerns below for your consideration.

Areas of Concern to the WPRA

1. The North Portal presentation assumes aggressive development.

The BT710 alternative plan for the Pasadena 210 'stub' as portrayed in the Maxima report, focuses on an extremely aggressive development approach that may not be realizable or supported by the citizens of Pasadena. The BT710's plan implies that the entire 210 'stub' will be converted to a high-density development. The report states' "this could create as much as 2.5 million square feet of new housing, retail and office space". It goes on to cite specific figures regarding the number of jobs and wages created, and property taxes collected. We are concerned that the development may be overstated, and that the BT710 economic analysis may consequently have overestimated economic benefits.

It should be acknowledged that the Pasadena 210 stub lies in a historic district. While higher density development may be possible on the north and east 210 stub boundaries, the west and south end of the stub are adjacent to single family homes and schools. Any land use plan needs to be sensitive to neighborhoods, include appropriate transitions and be consistent with Pasadena's General Plan. Implying that the 210 stub will be developed with such intensity may undermine the Connecting Pasadena Project's (CPP) vision, which was developed as a large citizen grass roots effort and was endorsed by the City of Pasadena.

Recommendation: Work with the CPP to determine what land use scenarios are feasible and appropriate, and adjust economic analyses accordingly.

2. Discussion of Glendale-region solutions that might relieve north-south traffic in the SR-710 Study Area is absent.

At the 9/11/13 Metro SR-710 Technical Advisory Committee (TAC) Meeting, Metro showed that 35% of all average SR-710 tunnel daily traffic would be traffic redirected from the Glendale I-5 and 2 freeways. As discussed in the BT710 plan, this is not surprising since the Glendale area is in the middle of a LA County 'non-transit V'. Traffic on the Glendale I-5 and 2 freeways is also identified in the SR-710 Draft Environmental Impact Report / Environmental Impact Statement (EIR/EIS) as being a driver for the SR-710 Project Need.

For these reasons, the Pasadena SR-710 Preferred Alternative recommended that transportation solutions in the Glendale region be considered. While the BT710 plan discusses an east-west BRT connecting Pasadena to Hollywood in the 'What Could Happen with More Funding' part of the plan, there is no discussion of a possible north-south route. Past Metro studies have demonstrated that a Los Angeles – to Glendale – to Burbank transit line would be highly beneficial. While it is indicated on the BT710 "Premium Transit Connectivity" page that a north-south LA - to - Glendale link is being studied, the importance of implementing this route and the BT710's support of this route, is not discussed. Furthermore, the importance of connecting the BT710 proposed east-west Pasadena-Hollywood route with the Glendale north-south route is not described. Reviewing the "Los Angeles Metro Rail Plan" map shown on the BT710 website, it appears that the proposed north-south Glendale route will not extend far enough north to make a meaningful connection.

Recommendation: Address and discuss the importance of a north-south Los Angeles – to Glendale – to Burbank transit route to improve north-south transit in the Glendale region and the BT710 Project's support of that route if applicable. This discussion should emphasize the importance of connectivity of planned and proposed routes.

3. There is insufficient information and over-specification of the 'North-South Connections' transit design that travels south from Pasadena.

The deficiencies with Metro's SR-710 proposed LRT and BRT alternatives is widely recognized and agreed upon by local communities. We believe that these alternatives were not seriously studied in the SR-710 Draft EIR/EIS, or designed for success. For example, the elevated track for the proposed LRT in East Los Angeles would result in significant environmental impacts to that community. This is an environmental justice issue. The WPRA firmly stated our concerns with this design in our response to the

SR-710 Draft EIR/EIS. Also, the Pasadena Preferred Alternative document recognized that “the precise alignment, design (i.e. elevated or at-grade) and station locations must be developed in direct consultation with local communities along the proposed line”.

Unfortunately, we believe that the BT710 Project, in an effort to quickly release a preliminary preferred alternative, was unable to perform an in-depth study of options for the ‘North-South Connections’ transit option, or to sufficiently include key affected communities and organizations in their development process. While this is understandable, we believe it is now time to move forward with a more refined plan that resolves remaining issues and includes community input.

Some issues that we believe require further work includes the following:

- ***The designation of the route as a BRT or LRT line does not appear to be resolved, and the selection of BRT as the preferred option is not explained.*** In discussions with BT710 members and the broader community, it has been suggested that all LRT alternatives were excluded from the plan because the Los Angeles communities were concerned that any LRT line would include elevated tracks in their region. However, it is not clear that these communities would still be opposed to LRT if the design were changed to address important environmental impacts (e.g. undergrounding, relocating stations, etc.) in their area. Moreover, the BT710 plan still leaves open the possibility of an LRT option. It states, “as ridership continues to grow, the community may explore the possibility of a light rail option that could further enhance the existing transit network”. However, the BT710 plan currently does not present ‘ridership’ numbers to provide context and additional rationale for the selection of BRT over LRT was not provided.
- **The designation of the transit route as a surface route may be premature.** If BRT is selected as the preferred option, then a surface route is logical. However, a short segment of undergrounding might be warranted in Old Pasadena to mitigate impacts to cultural resources; further study is required. Moreover, undergrounding will remain an option until a final decision is made to eliminate the LRT alternative (see above).
- **The rationale for selecting transit stops is not provided.** The North-South Connections map shows specific transit stops without explanation or criteria for chosen locations. Example questions we have include the following: 1) Why isn’t there a stop in Alhambra? 2) Is a stop in South Pasadena necessary given that South Pasadena is already connected to the transit network via the Gold Line?

Recommendation: We recommend that the BT710 plan be less specific on the implementation of this option until a meaningful transportation study is performed for this route. For example, we recommend that the proposed BRT surface plan be labeled as an ‘example’, ‘representative’ or ‘preliminary’. When decisions are made, it is important that the plan specify the decision rational and/or selection criteria in order to provide transparency and build public support. In the interim, the BT710 group should continue its worthy efforts to engage the communities affected and continue to work toward a regionally accepted plan.

4. The long-range plan appears to not include a LRT element that meaningfully addresses traffic in the SR-710 Study Area.

The WPRA firmly believes in multi-mode transportation because it provides choices for public transportation across all population segments. While we recognize that LRT might be cost-prohibitive in the near term due to funding constraints, we feel strongly that the BT710 long-range plan should be more bold and visionary regarding the future of public transportation in our region. It is important that a strong LRT element be included on the BT710's 'What Could Happen with More Funding' list.

We find the selection of extending the Foothill and Eastside Gold Line as part of the long range plan disappointing. While the Gold Line extensions are very worthy transit projects, we do not think that building these projects would significantly contribute to solving transportation issues in the SR-710 Project Study Area; the efficacy of extending these lines has not been demonstrated relative to the area of interest. Other LRT options, (e.g. a Los Angeles – to Glendale – to Burbank LRT route, or a redesigned and undergrounded 'North-South Connections' LRT route described above) seem likely to have more direct benefits in the area of interest, especially in the north-south travel direction. Unfortunately, these options are not discussed.

Recommendation: Add a meaningful LRT option to the BT710 long-range plan to make it a truly multi-mode solution. This might be accomplished by any one or more of the following: 1) Supporting an LRT option to be developed in the Glendale/Burbank region, which is an underserved transit community, 2) Selecting LRT as the preferred option for the North-South Connections route (note: this should only occur after serious study and approval from the affected communities), or 3) Demonstrating that the proposed Gold Line extensions will meaningfully improve transportation in the SR-710 Study Area, including along north-south routes. If the intent of including the Gold Line extensions as part of the the BT710 plan is to demonstrate that there are worthy projects that could be funded if the freeway tunnels aren't built, we recommend that this be simply stated, rather than confusing the merits of technical solutions with those of finance.

5. The transit solutions overview is incomplete and unclear.

The 'Premium Transit Connectivity' diagram is incomplete and requires correction. Prior to 11/16/15, the diagram showed the North Hollywood to Pasadena BRT traveling east-west and the Valley Boulevard BRT traveling east-west. After 11/16/15, the Rosemead BRT appeared on the diagram. Unfortunately, it is shown as traveling east-west, rather than north-south, which is in error. Also, there is no description of the Rosemead BRT connectivity in the text. The absence of the other transit recommended in the BT710 plan (e.g. the North-South Connection from Pasadena, or the LA – Glendale – Burbank BRT being studied) is notable and does not present an integrated story.

Recommendation: Provide a diagram showing all of the recommended BT710 transit projects on one map. Routes should be shown in the correct geographic direction and in the context of the region's cities and population centers. Key connections to existing and proposed transit should be illustrated.

Thank you for considering our point of view. We sincerely appreciate your efforts to date and look forward to working with you moving forward.



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