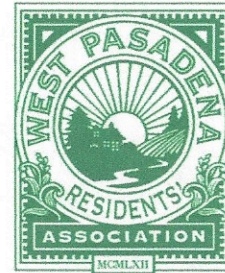


**Date:** December 20, 2018

**To:** Via Email and Letter  
Garrett Damrath, Chief Environmental Planner  
Division of Environmental Planning  
Department of Transportation, District 7  
100 S. Main St, MS-16A  
Los Angeles, CA 90012



**Reference 1** SR-710 Project Final Environmental Impact Report / Environmental Impact Statement and Individual Section 4(f) Evaluation, State Clearinghouse Number: (SCH#) 1982092310, File number: 07-LA-710 (SR 710), Caltrans Project No.: EFIS 0700000191 (EA: 187900), Title: State Route 710 North Study.

**References 2:**

- a) 'West Pasadena Residents' Association (WPRA) Response to the SR-710 Draft Environmental Impact Report (DEIR) / Draft Environmental Impact Statement (DEIS), August 4, 2015.
- b) 'WPRA Comments to the SR-710 North Study Findings of Adverse Effects (FOAE)', March 1, 2018.
- c) 'WPRA Comments to the SR-710 North Study Focused Re-circulated Draft Environmental Impact Report (FRDEIR)/ Supplemental Draft Environmental Impact Statement (SDEIS)', July 2, 2018.
- d) 'WPRA Comments to the SR-710 North Study Draft Memorandum of Agreement dated June 28, 2018', July 15, 2018.
- e) 'State Route 710 North Study Environmental Impact Report/Environmental Impact Statement', August 22, 2018. From the Los Angeles Conservancy, South Pasadena Preservation Foundation, Natural Resources Defense Council, West Pasadena Residents' Association, No 710 Action Committee, Westridge School.

**Subject:** WPRA Response to the SR-710 Final Environmental Impact Report (EIR) / Final Environmental Impact Statement (EIS)

Dear Mr. Damrath,

The West Pasadena Residents' Association (WPRA) appreciates the opportunity to review and comment on the State Route 710 (SR-710) North Study Final EIR/EIS. WPRA is an all-volunteer organization dedicated to maintaining and enhancing the character of west Pasadena and the quality of life throughout Pasadena. We represent 7,000 households and have nearly 1,000 dues-paying members. Because the SR-710 Study Project will have a very large and permanent impact on our community, our organization has reviewed the SR-710 Final EIR/EIS released in November, 2018.

We were very pleased to find that the report selected the Transportation System Management (TSM) / Transportation Demand Management (TDM) Alternative for implementation. We



believe that this alternative is highly preferable, providing the required transportation performance with minimal negative environmental impacts. For this reason, this alternative is broadly accepted by all cities along the SR-710 corridor and by other key stakeholder organizations. We look forward to working with you to both successfully implement this alternative and other supplemental projects that will augment transportation improvements along the SR-710 Study route.

While we support the TSM/TDM Alternative, we are quite alarmed by language in the Final EIR/EIS Executive Summary, pg. ES-1. Specifically,

*"After comparing and weighing the benefits and impacts of the study alternatives summarized in Table ES-1 of the Executive Summary of the Final EIR/EIS; reviewing the comments received during the public circulation of the Draft EIR/EIS and Focused RDEIR/SDEIS; and completing technical studies and performance evaluations for each of the alternatives, the Freeway Tunnel Alternative with Single Bore Tunnel design variation was determined to provide operational benefits. However, with the lack of funding and the lack of community consensus, the Single Bore Tunnel Alternative, estimated at \$3.15 billion, cannot be accomplished successfully within a reasonable period of time."*

These words appear to be carefully chosen to applaud the purported merits of the Tunnel Alternative. They further suggest that if funds were to become available in the future and the project could be accomplished within a "reasonable period of time," the tunnel alternative could still be selected in the future. Our legal counsel has informed us that if the tunnel analyses are certified as part of the Final EIR/EIS, they might still be relevant and viable for five years or more.

We find the continued threat of a tunnel(s) to the communities along the SR-710 corridor to be unacceptable; our communities have suffered from this threat for more than 60 years. Moreover, we are concerned that a possible resurrection of the Tunnel Alternative is based on deeply flawed tunnel environmental analyses. The WPRA thoroughly documented our original Findings of Inadequacy to the Draft EIR/EIS in Reference 2a above, and in follow-on letters provided in References 2b through 2e. Unfortunately, most of our concerns regarding the tunnel analyses have been arbitrarily dismissed, or not addressed in a meaningful way.

From its inception, the SR-710 Study environmental process has been improperly executed to favor the Tunnel Alternative. Problems include an unstable and distorted project definition and need statement, improper SR-710 and I-710 project segmentation, inappropriate Study Area boundaries, and biased bundling of options. Several of the tunnel alternative options are also not credible. This includes the 'no truck' option, which is not enforceable either in the near term or future, and the single-bore tunnel option, which is not reasonable because it exceeds reasonable margins of safety and passes unacceptable fire and accident risks onto tunnel users.

The tunnel environmental impact assessments are also grossly flawed. Many assessments lack definition, are incomplete, or deferred. We continue to find significant deficiencies in the following areas: Land Use, Growth, Community Impacts, Utilities / Emergency Services, Traffic and Transportation / Pedestrian and Bicycle Facilities, Visual / Aesthetics, Cultural Resources, Hydrology and Floodplain, Water Quality and Storm Water Runoff,



Geology/Soils/Seismic/Topography, Air Quality, Noise and Vibration, Energy, Natural Communities, Wetlands and Other Waters, Plan Species, Animal Species, Threatened and Endangered Species, Invasive Species, Construction Impacts, and Cumulative Impacts.

To avoid possible litigation we recommend that Caltrans insert language in the final environmental process closeout documents - the Statement of Findings and Overriding Considerations and the Notice of Determination - to unequivocally state the following:

- The Tunnel Alternative analyses are not certified.
- If Caltrans were to consider implementation of a tunnel at a later time, a new environmental analysis would have to be performed (e.g. a Supplemental EIR is insufficient).
- Caltrans will remove the SR-710 segment from the 210 to the 10 freeways from the California Streets and Highways Code.
- Caltrans will return the freeway 'stubs' in Alhambra/Los Angeles and Pasadena to the local communities, and
- Caltrans will declare as surplus all properties in their possession that were seized for the purpose of implementing a SR-710 surface and/or tunnel freeway. Caltrans will also relinquish subsurface rights for these properties.

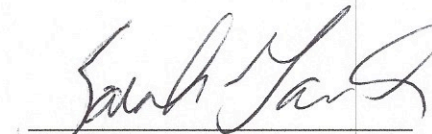
We remain optimistic that the SR-710 Project can be concluded without litigation if the concluding SR-710 environmental documentation language reflects Caltrans' stated intentions to move forward in solving the SR-710 route transportation needs in collaboration with the local communities.

We ask that this letter be put into the administrative record. Thank you for your consideration.



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Dan Beal  
WPRA President



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Sarah Gavit  
WPRA SR-710 Lead

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The Honorable Ara Najarian

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Day 1

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