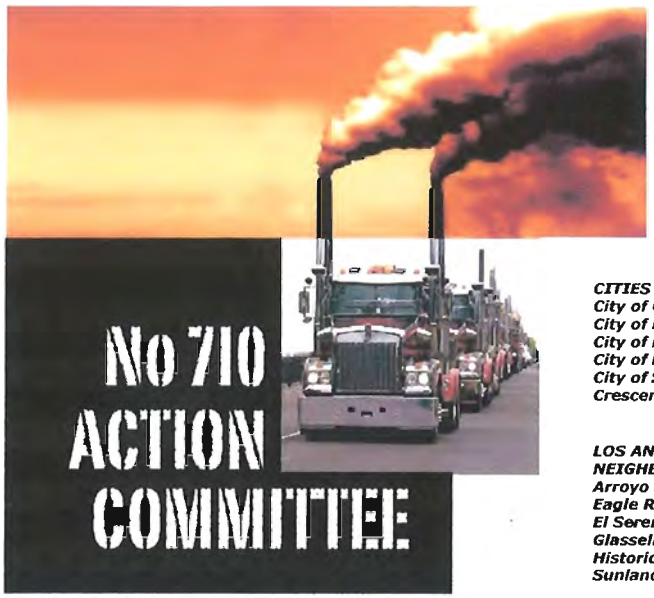


***OPPOSITION GROUPS** (PARTIAL LIST)*
LA RED, El Sereno
Caltrans Tenants of the 710 Corridor
Glassell Park Improvement Association
Far North Glendale Homeowners Association
San Rafael Neighborhoods Association
West Pasadena Residents Association
Highland Park Heritage Trust
La Canada Unified School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

CITIES
City of Glendale
City of La Canada Flintridge
City of Los Angeles
City of Pasadena, Western Routes
City of South Pasadena
Crescenta Valley Town Council

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

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

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

Post Office Box 51124
Pasadena, CA 91115
Telephone 626-799-0044
no710extension@aol.com
no710.com

Ron Kosinski
CalTrans – District 7
Division of Environmental Planning
100 South Main Street, MS 164
Los Angeles, CA 90012

September 26, 2012

Dear Mr. Kosinski:

The California Environmental Quality Act (CEQA) requires that the cumulative impacts of projects be assessed together. "Cumulative impacts refer to two or more individual effects which when considered together, are considerable or which compound or increase other environmental impacts." (Title 14, Cal. Code Regs. (CEQA Guidelines) #15355). Below are several references from CalTrans, METRO and SCAG documents, as well as reports commissioned and participated in by staff members from these agencies, that will demonstrate the agencies' repeated statements that the lower I-710 Corridor Project with its trucks for goods movement relates to the SR 710 North tunnel project while denying to the public that there is any correlation and thus segmenting the project.

Below is an excerpt from the **Executive Summary of the I-710 Corridor EIR/EIS, 2012**, pgs. 1-1 and 1-8:

> *The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), the Gateway Cities Council of Governments (GCCOG), the Southern California Association of Governments (SCAG), the Ports of Los Angeles (POLA) and Long Beach (POLB) (collectively referred to as the Ports), and the Interstate 5 Joint Powers Authority (I-5 JPA) (collectively referred to as the I-710 Funding Partners), proposes to improve Interstate 710 (I-710, also referred to as the Long Beach Freeway) in Los Angeles County between Ocean Blvd. and State Route 60 (SR-60). The*

proposed project is referred to as the I-710 Corridor Project. I-710 is a major north-south interstate freeway connecting the city of Long Beach to central Los Angeles and ***beyond.*** *Within the I-710 Corridor Project Study Area (Study Area), I-710 is a significant goods movement artery for the region and serves as the principal transportation connection for goods movement between POLA and POLB, located at the southern terminus of I-710, and the Burlington Northern Santa Fe (BNSF)/Union Pacific (UP) Railroad intermodal rail yards in the cities of Commerce and Vernon.*

The I-710 Corridor is a vital transportation artery not only for the communities along the corridor, but also ***because it links POLA and POLB to southern California and the rest*** *of* ***the nation via connections to other Interstate and State highways****. An essential component of the regional, statewide, and national transportation system, it serves both passenger and goods movement vehicles. As a result of population growth, growth in international cargo being shipped through the Ports, increasing traffic volumes, and aging infrastructure, the I-710 Corridor experiences serious congestion and safety issues.*

From the CalTrans District 7 in-house **I-710 Transportation Concept Report** (CalTrans 2000 p. IV-2 & XI-2: http://www.dot.ca.gov/hq/tpp/corridor-mobility/d7-page.html):

Route 710 is an **interstate, interregional commute corridor** that provides access *to the Los Angeles Central Business District (CBD) from Long Beach to the south and from Pasadena to the north. Consequently given that I-710 covers major ports and terminals it* ***serves a large volume of truck traffic****. To greater and lesser degrees, all of these facilities depend on truck traffic for their existence or prosperity.*

Any increase in capacity will produce improvement for I-710, the surrounding corridor and the region in general.

In analyzing the benefits of any capacity improving project on any facility in an urban area, the project will ***draw volume*** *from surrounding facilities,* ***with the net result being that while the improved facility may not operate better****, the corridor as whole will show definite improvement.*

The following question and answer were imbedded in the **I-710 Technical Advisory Committee (TAC)** minutes of March 14, 2001, p. 6:

- *Robert Quintero (Commerce):* ***How are you going to address bottlenecks (downstream) created by widening 1-710?***
- *Bill Pagett (Chair): We don't want to involve the City of Los Angeles. This project terminates at SR-60 because* ***we want to stay as far away from the I-710 project to the north (Pasadena) as possible.***

METRO commissioned the **Route 710 Tunnel Technical Feasibility Assessment Report** from Parsons Brinckerhoff, published on June 7, 2006. They subsequently re-named the report a "fatal flaw analysis". The truck, auto, toll and diversion tables (Table 10-4, 10-5) on p. 10-129 and 10-130 are attached with highlights below:

Estimated Weekday Total Traffic	*169,581*
Estimated Truck Volumes	*17,853*
Estimated Auto Diversion Rate	*30%*
Estimated Truck Diversion Rate	*35%*
Annualized Auto Traffic	*38,986,960*
Annualized Truck Traffic	*3,713,424*

On December 5, 2007 the USC Keston Institute for Public Finance and Infrastructure Police held a **Financial Planning Charrette for the 710/210 Tunnel Connection**.(www.**usc**.edu/schools/.../**keston**/.../710Financing**Charrette**FinalReport_001.pdf) Attendees included representatives of SCAG, CalTrans, METRO, USC, two Assemblymembers and/or aides, a Spanish tunneling company, and bankers. The following excerpts illustrate the cumulative impacts of both the I-710 South and SR-710 North:

> *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.*
>
> *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.*
>
> *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.*

Also in 2007, Hasan Ikhrata, director of planning and policy for the Southern California Assn. of Governments (SCAG) was interviewed for an article:
Needed by 2050: decked freeways, tunnels, tolls, trains By Rong-Gong Lin II and Jeffrey L. Rabin | Times Staff Writers
http://articles.latimes.com/2007/jul/11/local/me-roads11

> *Planning is just beginning for **a toll road system for trucks** that would cover the heavily traveled route from the ports of Los Angeles and Long Beach to warehouses and logistics facilities of the Inland Empire, from which cargo is distributed across the United States.*

And decades of opposition from South Pasadena has stalled CalTrans from completing the missing link of the 710 Freeway which would ***offer trucks on the Long Beach Freeway an alternate route*** *to the Central Valley or the Inland Empire.*

Rather than complete a promised feasibility study including cost-benefit analyses of the project, a geotechnical soils analysis for a tunnel was issued in the **SR-710 Tunnel Technical Study, October 2009** from a CalTrans contract with CH2M HILL.

...the study was to be guided by "route-neutral" principles for the extension of I-710. Route-neutral means that all routes receive equal attention and no route for the tunnel is favored over another. For purpose of this study, the invert (bottom) of the tunnel is assumed to be about 200 feet below ground surface (bgs) and the diameter of the tunnel to be about 50 feet ***(actually 57 feet to contain both 2 truck lanes above and 2 vehicles lanes below according to previous diagrams).***

In May, 2009 a report called the Iteris **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 to* Southern California Association of Governments was issued. The City of La Canada-Flintridge's traffic consultants summarized the contents on the attached fact sheet. The introduction lists the purpose of this study as follows:

While the planned I-710 gap closure and truck lanes are intended to facilitate eastbound connections at the SR-91 and SR-60, south of the study area, ***the I-710 gap closure would allow trucks to bypass the congested downtown Los Angeles area for trips to and from the Central Valley and Northern California areas.*** *These and other dynamics of the I-710 gap closure as it relates to effects on vehicular and* ***especially truck traffic volumes within the influence area of the I-710 gap*** *will be studied in greater detail in this project.*

The project team conducted an extensive research of trucking-related businesses within the study area. *Businesses include trucking companies, industries, manufacturing, warehouses and distribution centers within the study area. The list includes 89 trucking companies, 53 warehouse establishments, 35 industries, 87 manufacturing companies and 65 distribution centers. The project team contacted all the businesses identified for one-on-one telephone interviews. The objective of the interview is to obtain insight into travel patterns related to trucking within the study area.* ***Of 329 calls made, 18 businesses elected to voluntarily participate*** *in the interview. The* ***participation rate was a mere 5.5%.*** *If I-710 is connected to I-210 would this affect your trucking operations?: 50% (9) of the operators* ***would use*** *the I-710 if it connected to I-210, 44% (8)) of the operators* ***would not use*** *the I-710 if it is connected to I-210 and 6% (1)) of the responses* ***were not sure.***

The above report was not made public other than to the Arroyo Verdugo Subregion, of which La Canada-Flintridge is a member. And although the survey produced an **"insignificant" result of data** compared to normal data calculations, The **I-710 Missing Link Study** was used along with the **2006 MTA Feasibilty Assessment (re-named by CalTrans the "fatal flaw analysis")** and the **2009 CalTrans geotechnical study**, done instead of a true feasibility study, as the basis of the next CalTrans in-house **Public Private Partnership Program** report from **July 8, 2010,** Appendix E, SR 710 North Tunnel:

> *p. 1 The Interstate 710 (I-710) "Long Beach" freeway serves as a major north-south link in the Los Angeles County transportation network. The freeway is an extensively traveled facility and its level of service has deteriorated as congestion and demand grow within the corridor.* ***This facility currently extends from its southern terminus in the City of Long Beach to Valley Boulevard, just north of the Interstate 10 (I-10) "San Bernardino" freeway*** *near the boundary between Cities of Los Angeles and Alhambra. Beyond this northern terminus is a 4.5 mile gap in the Route 710 until the freeway resumes at Del Mar Boulevard, in the City of Pasadena, where it extends 0.6 miles to the north---to its junction with the Interstate 210 (I-210) "Foothill" freeway.*

Clearly METRO believes the corridor is one facility not two. In fact in the **April 18, 2012 PPP METRO report**, p. 5, the description is as follows:

> *The SR-710 Gap Project will be a five mile connection between the I-10 and the I-210 Freeway. As a PPP, this project would be recommended to be undertaken as a toll concession, with the concessionaire taking toll revenue risk, owing to the projected financial strength of the toll revenue stream. As a "gap closure" rather than a "greenfield" project,* ***traffic volumes – and hence toll revenue – are projected to be extremely high from opening day forward.***

One must assume that the expected traffic will come from the trucks facilitated by the expansion of the lower I-710 through the corridor to a new toll tunnel since there is not the through-traffic (only 20%) of commuters to generate such an inflated prediction.

During METRO community forums in 2011, a **Preliminary Statement of Purpose and Need for the SR 710 Gap Closure** was offered as a handout that indicated the project was to:

> *Improve regional mobility and accessibility for the movement of people,* ***goods and services***

This contradicts their oft-repeated statements to the contrary, that trucks will not be allowed, that they do not know if trucks will be allowed, that the trucks from the ports have nothing to do with this project, while they emphasize the need for commuter traffic.

Doug Failing, METRO's executive director of highway programs was a little more candid in an article from **Everything Long Beach, April 3, 2011** http://www.everythinglongbeach.com/metro-transportation-projects-2011:

> *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, and goods movement from California's Central Valley, America's bread basket.*
>
> - *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.*** *"It would address the demands of commerce—specifically goods movement from the twin ports of L.A. and Long Beach...and goods movement from California's Central Valley..." press release 3/21/11*

The **2008 Regional Transportation Plan, Making the Connections**, issued by SCAG said:

> *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.***
>
> *"SCAG recognizes the I-710 as the* ***first segment of*** *a comprehensive regional system of* ***truck-only freight corridors****. In the* ***2008 RTP****, SCAG recommended the inclusion of dedicated lanes for clean trucks on the I-710. In the* ***2012 RTP****, SCAG identifies an east-west corridor concept that would complement existing efforts to create a comprehensive, zero emission, truck-only freight corridor system."* (Source: p 18 in the 2012-2035 RTP GOODS MOVEMENT SECTION pdf)

Attached is an exhibit that depicts the I-210 freeway as a freight corridor candidate. It was assumed by SCAG that the I-710 would be somehow connected to the 210, otherwise WHY would it be an East/West freight corridor candidate?

Attached also is a corridor map from a Los Angeles Times article **Interstate 710: A chance to close an L.A. freeway gap**, May 23, 2010 http://www.**longshoreshippingnews**.com/.../**interstate-710-a-chance-to-close**-an-l-a-**freeway-gap/**. The caption says "This map of South Pasadena shows the 4-mile gap in a **critical north-south route for cargo coming to and from the ports of LA and Long Beach."** The article then proceeds, one can assume from an MTA press release, to discuss the METRO meeting on Thursday of that week. This is one more example of METRO revealing to the shipping industry the true nature of the SR-710 project while denying to the stakeholding public the same facts.

We believe that the evidence provided above leads to concrete assumptions that the EIR//EIS for the I-710 project has cumulative impacts that violate the mandates of CEQA to consider all subsequent project 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 and extend the SR-710 with a tunnel 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 extension of the SR-710 with a tunnel must be considered where the extension "is a reasonably foreseeable consequence of the initial project; and the future extension . . . 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 the lower I-710 project and the SR-710 extension by tunnel meets these two requirements and must be addressed in the EIR. Furthermore, if expansion of the lower I-710 would entail increased capacity, the effects of such increased capacity must be taken into account.

CEQA requires that an EIR address growth-inducing effects of a proposed project. See CEQA Guidelines § 15358(a) (2). Here, the EIR 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" such as with the SR-710 tunnel project. CEQA Guidelines §15358(a)(2). The proposed 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. This increase will have effects on the physical environment to the cities north of the project, the cities within the SR-710 study area and even in the Inland Empire where there are regional goods distribution centers. This increase in throughput will lead to additional traffic on the I-710, I-405 and SR-710, as part of a significant increase in goods movement and thus air pollution and health impacts in the Southern California region.

We appreciate your attention to these concerns and look forward to your re-evaluating the cumulative impacts of both projects and the release of a truly comprehensive document.

Sincerely,

Clarice Knaff

No 710 Action Committee
(Signatures attached)
Attachments

Annual Net Revenue Estimate	$112,674,176	$147,842,720	$177,149,840	$200,595,536
Available for Bonding (Coverage Rate 1.5)	$75,116,117	$98,561,813	$118,099,893	$133,730,357
Issue Bonds (13 times Available for Bonding)	$976,509,525	$1,281,303,573	$1,535,298,613	$1,738,494,645
Percent of Total Project ($3 billion)	32.55%	42.71%	51.18%	57.95%
Additional Cost to Project (Interest on Bonds)	$1,095,142,893	$1,436,965,504	$1,721,817,679	$1,949,699,420

Source: Sharon Greene and Associates, May 2006.

Table 10-4:
Order of Magnitude Toll Revenue and Level of Bonding Estimate–Autos and Trucks
(2006 dollars)

Assumptions	Toll Revenue Scenario 1	Toll Revenue Scenario 2	Toll Revenue Scenario 3	Toll Revenue Scenario 4
Estimated Weekday Total Traffic	169,581	169,581	169,581	169,581
Estimated Truck Volumes	17,853	17,853	17,853	17,853
Estimated Auto Diversion Rate	20%	25%	30%	35%
Estimated Truck Diversion Rate	25%	30%	35%	40%
Annualization Factor	320	320	320	320
Toll Rate - Auto	$3.00	$4.00	$5.00	$6.00
Toll Rate - Trucks	$4.00	$5.00	$6.00	$7.00
O&M Cost	$33,000,000	$33,000,000	$33,000,000	$33,000,000
Debt Coverage Level	1.5	1.5	1.5	1.5
Estimated Annual Tunnel Traffic				
Annualized Auto Traffic	38,842,240	36,414,600	33,986,960	31,559,320
Annualized Truck Traffic	4,284,720	3,999,072	3,713,424	3,427,776
Estimated Tunnel Revenues				
Annual Auto Revenue	$116,526,720	$145,658,400	$169,934,800	$189,355,920
Annual Truck Revenue	$17,138,880	$19,995,360	$22,280,544	$23,994,432
Total Annual Revenue	$133,665,600	$165,653,760	$192,215,344	$213,350,352
Estimated O&M Costs				
Annual O&M Cost Estimate	$33,000,000	$33,000,000	$33,000,000	$33,000,000
Estimated Net Revenue				
Annual Net Revenue Estimate	$100,665,600	$132,653,760	$159,215,344	$180,350,352
Available for Bonding (Coverage Rate 1.5)	$67,110,400	$88,435,840	$106,143,563	$120,233,568
Issue Bonds (13 times Available for Bonding)	$872,435,200	$1,149,665,920	$1,379,866,315	$1,563,036,384
Percent of Total Project ($3 billion)	29.08%	38.32%	46.00%	52.10%
Additional Cost to Project (Interest on Bonds)	$411,789,479	$737,670,488	$1,019,444,979	$1,166,440,977

Source: Sharon Greene and Associates, May 2006.

Also Tables 10-5 (autos only use tunnel) and 10-6 (autos and trucks use tunnel) provide additional estimates of the potential percent of the total construction costs from toll revenue bond based on variations in the toll rate and the diversion rate.

Table 10-5:
Estimated Percent of Total Construction Cost Paid by Toll Revenue Bonds – Autos Only

Diversion Rate	$2 Toll	$3Toll	$4 Toll	$5Toll	$6 Toll	$7 Toll
15%	21%	35%	49%	64%	78%	93%
20%	19%	33%	46%	60%	73%	87%
25%	17%	30%	43%	55%	68%	81%
30%	16%	27%	39%	51%	63%	75%
35%	14%	25%	36%	47%	58%	69%
40%	12%	22%	33%	43%	53%	63%

=Maximum potential share of project funding considered reasonable

Source: Sharon Greene and Associates, May 2006.

Table 10-4:
Estimated Percent of Total Construction Cost Paid by Toll Revenue Bonds – Autos and Trucks

Diversion Rate *	$2 Auto / $3 Truck	$3 Auto / $4 Truck	$4 Auto/ $5 Truck	$5 Auto / $6 Truck	$6 Auto / $7 Truck	$7 Auto/ $8 Truck
15%A / 25%T	18%	31%	44%	58%	71%	84%
20%A / 30%T	16%	29%	41%	54%	66%	78%
25%A / 35%T	15%	26%	38%	50%	62%	73%
30%A / 40%T	13%	24%	35%	46%	56%	67%
35%A / 45%T	11%	21%	31%	42%	52%	62%
40%A / 50%T	10%	19%	28%	38%	47%	56%

* %of Autos / % of Trucks Diverted

=Maximum potential share of project funding considered reasonable

Source: Sharon Greene and Associates, May 2006.

Policy Considerations

In addition to the toll revenue generation and level of bonding potential associated with tolling, there are several risk factors that must be considered with respect to inclusion of tolling in the financial strategy for the project including model input risk, event/political risk, ramp-up risk, and construction risk. The Financial Report has described examples of recent toll projects and highlighted the types of risk experienced.

Based on those examples, it is anticipated that future projects will be required to provide more detailed analysis and justification of assumptions for the cost and revenue estimates that are submitted as part of their request for bond funding.

Bond funding will likely not be available until the construction is nearly completed or completed. Based on the project examples above, the bond market is much less likely to finance projects until the detailed construction costs and revenue estimates are available. This would include items like the final concrete and steel costs since these construction components costs can fluctuate greatly and there is no futures market for either component. Additionally, as a

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

1. Project Description
Physical description of the P3 project as studied in this analysis
Twin 57' tunnel bores, per Alternative A1 along alignment A1, all as described in the Public Project Definition.
Description of the delivery method planned for the P3 project
Full concession, nominally 50 years, with revenue risk assumed by the concessionaire, to include pre-development agreement (PDA), design, build, finance, operate and maintain over the term of the concession. A toll structure is assumed at average realization of $5 in 2010 dollars, with trucks allowed, and an average annual tolled 2030 volume of 123,500 veh/day.
Discussion / Notes
The DBFOM P3 option is very similar to the public option except in schedule, engineering costs, schedule related costs, and public risks.
2. Capital costs
Total capital costs in 2010 $'s = $3.2B (Compared to $3.4B for public option). Total YOE $'s = $4.0B (Compared to $4.9B for public option and $4.1B for the DBFOM, non-PDA option).
3. Projected schedule for the P3 project
Construction start in 2015 with a completion date in 2021, compared to a construction start in 2018 and a completion date of 2026 in public option.
4. Identification of existing anticipated funding sources (Millions YOE Dollars)
A total of $1.049B in Measure R funds, the bulk of it ($0.749B) available in 2034 thru 2037, with critical funds of $170M for preconstruction activities in 2010-2018. Assuming a discount rate of 5%, Net Present Value (2010 $'s) of the Measure R funds is $0.396B. Net Present Value of the toll revenue under the assumptions listed above is $5.4B compared to$4.9B for the public option
5. Identification of issues associated with the P3 project
The primary issue is the public decision making process as this project has both vocal opposition and substantial support. Also, there is the technical challenge of constructing a 57' tunnel bore. While Tunnel Boring Machine (TBM) and associated lining technologies have made huge advances in the last decade and it is generally accepted that such a bore is now feasible, the fact is this is a 5' larger diameter than has been bored to date. The final key issue is the estimation of traffic demand, toll sensitivity and therefore toll revenue that can be relied upon for committing to this project. Under the assumptions of this study, this project is financially feasible, but specific traffic modeling studies are critical to the furtherance of this project. A full risk assessment has been completed for the DBFOM P3 project alternative.

SR-710 GAP CLOSURE PROJECT

PRELIMINARY STATEMENT OF PURPOSE AND NEED

Introduction

The following is intended to serve as a Preliminary Statement of the Need and Purpose for an SR-710 North 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 Directors' 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 the Project. Further refinements to this Statement will occur pending the outcome Public Scoping and related technical studies.

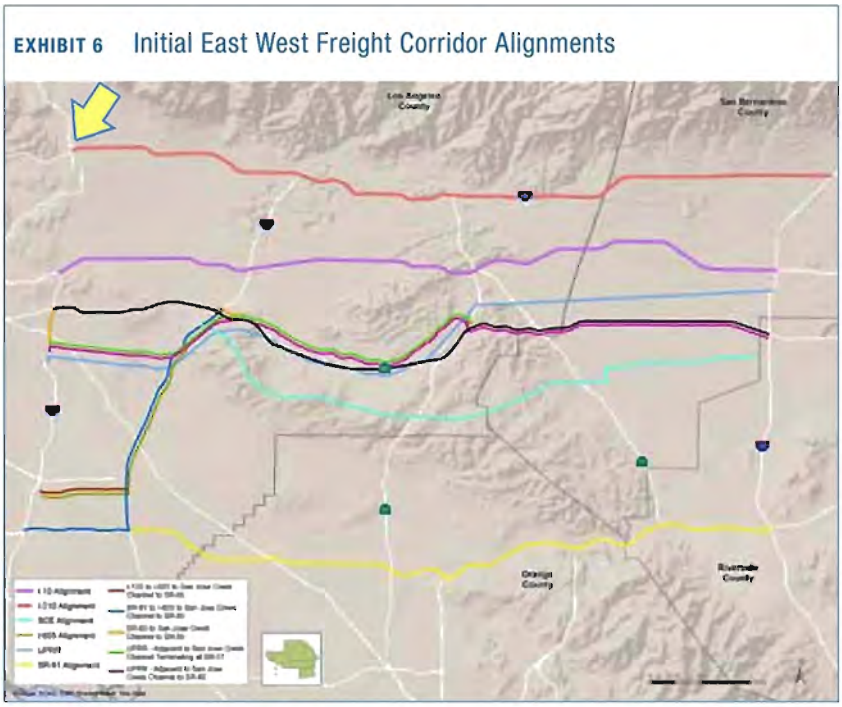
The Purpose and Need for the Project is as follows:

- 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.
- Reduce greenhouse gas emissions from mobile sources.
- Provide a project that minimizes impacts in local communities to acceptable levels.

What is most disturbing about this graph is that it was not in the interactive website but is in the original 2012-2035 RTP PDF. It clearly shows a starting point connecting where the 210 and 134 freeways split and converge.

The only explanation is that at some time, SCAG envisioned the 710 freeway ultimately connecting with the 210 Freeway and identified this starting point for the 210 as a freeway that would actually become part of the 710 freeway (directly north of the 710's end at Valley Blvd)

SCAG itself is quoting that the I-710 is "the first SEGMENT" to a comprehensive regional system of freight corridors.

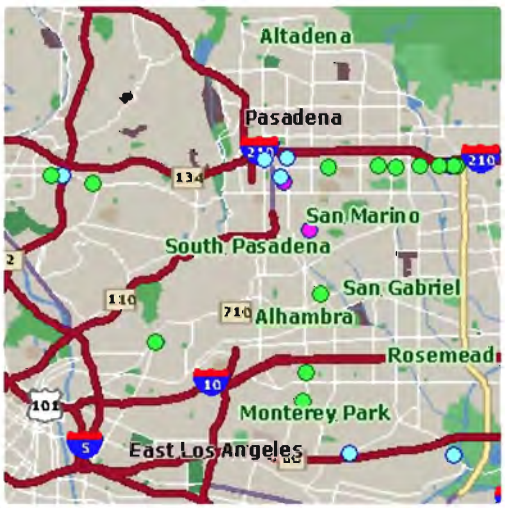


This Graph image (above) is nowhere to be found on the "new interactive" SCAG RTP web version and it appears difficult to find the original PDF of the 2012-2035 RTP. It is obviously a graph that SCAG does not want anyone to bring up as they continue to back off of the 210 as a potential freight corridor. IF THE 710 to 210 IS SUCCESSFULLY IMPLEMENTED FOR DEVELOPMENT, THE 210 WILL BE A VERY CRITICAL "BACK UP" ROUTE FOR THE E/W FREIGHT CORRIDOR because nothing will prohibit the route from being reconsidered as an alternate or even an additional (secondary) double decked truck route.

« Pilot Board OKs Incomes For Columbia River And Bar Pilots

Jacksonville partners with Panama, foresees 'profound transformation in US cargo patterns' »

Interstate 710: A chance to close an L.A. freeway gap



This map of South pasadena shows the 4-mile gap in a critical north-south route for cargo coming to and from the ports of LA and Long Beach.

On Thursday, the board of the Metropolitan Transportation Authority is to consider whether to approve a study that would examine different project alternatives and their environmental impacts [to close the gap in Interstate 710]. … A 2006 study showed it was feasible from a geological standpoint to close the 710 gap via a tunnel. If the MTA board opts to proceed, the agency would study a wide range of alternatives including tunnels, improvement of surface streets or the originally planned surface freeway.

From the Los Angeles Times, May 23, 2010

May 26th, 2010 | Tags: Interstate 710, Port of Long Beach, Port of Los Angeles | Category: Ports

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