



City of South Pasadena Letter to Long Beach on Consideration of 710 Resolution

Desiree Jimenez

to:

pablo.rubio, larry.herrera, cityclerk

10/01/2013 12:14 PM

Cc:

"Sergio Gonzalez", "Sally Kilby"

Hide Details

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To: <pablo.rubio@longbeach.gov>, <larry.herrera@longbeach.gov>, <cityclerk@longbeach.gov>,

Cc: "Sergio Gonzalez" <SGonzalez@ci.south-pasadena.ca.us>, "Sally Kilby" <SKilby@ci.south-pasadena.ca.us>

Good Afternoon,

Attached is a letter from Richard D. Schneider, M.D., Mayor, City of South Pasadena, for distribution to the Long Beach City Council. The letter is in relation to Item No. 9 (Consideration of I-710 Freeway Extension Resolution) on tonight's Long Beach City Council Meeting Agenda.

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CITY OF SOUTH PASADENA

OFFICE OF THE MAYOR

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October 1, 2013

Honorable Mayor and City Councilmembers
City of Long Beach
333 W. Ocean Blvd.
Long Beach, CA 90802

Honorable Mayor and City Councilmembers:

The tone and verbiage of this resolution proposed by Councilmembers Neal, Johnson and Austin is quite similar to the position of the City of Alhambra. Although Alhambra has been supporting the 710 North extension for decades, this project has been stopped by federal injunction since 1973. The injunction is still in force today.

Interestingly, the basic reasoning is that completion of the 710 North extension is necessary for goods movement, specifically from the ports. This contradicts Metro and Caltrans which claim the goods movement problem ends at the 60 and 10 freeways. Their reason for the 710 North extension is traffic congestion relief and air pollution reduction.

If the true reason is goods movement to the 210 freeway, then Caltrans is violating the California Environmental Quality Act which prohibits segmentation of projects and requires cumulative impacts be assessed together. This means that Caltrans must combine the Draft Environmental Impact Reports (DEIRs) for the I-710 Corridor (South) and the SR-710 North. Our City Clerk provided you yesterday with a copy of our counsel's letter to Caltrans, dated September 19, 2012, concerning the I-710 Corridor DEIR and is also attached to this letter for your convenience.

If the Long Beach City Council decides to postpone or table the proposed resolution, the City of South Pasadena is willing to engage in a discussion of transportation solutions that will benefit both of our communities.

Respectfully submitted,

Richard D. Schneider, M.D.
Mayor

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September 20, 2012

Ronald Kosinski
Caltrans District 7, Division of Environmental Planning
100 South Main Street, MS 164
Los Angeles, CA 90012

Re: I-710 Corridor Project Draft Environmental Impact
Report/Environmental Impact Statement

Dear Mr. Kosinski:

On behalf of the City of South Pasadena, we provide these comments on the Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS) for the I-710 Corridor Project.

South Pasadena has been involved in issues related to the 710 (SR-710 and I-710) for decades. In April 2011 we submitted a letter regarding the scoping of the Proposed EIR/EIS on what you refer to as the "State Route 710 North Gap Closure Project" (hereafter referred as the "SR-710 North Project").

South Pasadena's primary concern is the devastating impact the SR-710 North Project could have on South Pasadena and the surrounding communities. However, the City and its residents are also very concerned that limited public resources be expended in a way that most cost effectively increases mobility throughout the entire Southern California Association of Government (SCAG) region. Therefore, any analysis of the effects of the I-710 Corridor's substantial increase in the capacity of the 710 at its southern portion must include an analysis of how those capacity increases could affect the northern portion and how those impacts can best be reduced or eliminated.

Together, the SR-710 North Project and the I-710 Corridor Project would encourage increased use of the I-710 freeway as a conduit for port cargo if the SR-710 North Project is a single highway, whether above or below ground, rather than a multi-modal alternative to increase mobility in the San Gabriel Valley and elsewhere in the region. The California Environmental Quality Act (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. “‘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.) “Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.” (*Ibid.*)

The cumulative impacts of the I-710 Corridor and SR-710 North improvements are likely to be significant and must be adequately considered in each EIR/EIS for each project. The Regional Transportation Plan modeled and included a tunnel for the SR-710 North Project, and also includes the I-710 Corridor project to expand capacity at the southern portion of the freeway. This supports the conclusion that there will be cumulative impacts from the two projects together that must be carefully considered.

The cumulative impacts section of the I-710 Corridor Project Draft EIR (DEIR) identifies the SR-710 North Project as a related project but then states: “Cumulative impacts [are] not identified at this time, but impacts as a result of this [SR-710 North] project may include geotechnical, erosion, hydrology, air quality, water quality, noise, biology, public utilities, vehicle traffic patterns, parking, land use planning and hazardous waste.” (DEIR, p. 3.25-5.) The DEIR claims “There are no adverse growth-related effects of the build alternatives; therefore, no avoidance, minimization, and/or mitigation measures are required.” (DEIR, p. 3.25-40.) However, contrary to this claim, increasing capacity at the south end of the I-710 freeway may very well result in additional traffic, including truck traffic, traveling north on the 710 to the I-210 freeway, and from the I-210 back south. Both EIRs must include a detailed analysis of the amount of increased traffic that may result from the synergistic effect of the two projects.

The increased traffic must be quantified as best as is possible with modeling because the construction of the two projects could compound or increase the adverse impacts from each. To address such impacts, the I-710 Corridor assessment should also emphasize alternatives to the preferred project in the EIR, such as fully using the Alameda Corridor and Alameda Corridor East rather than relying on 710 capacity increases.

A multi-modal alternative for the SR-710 North Project that does not include a freeway or a roadway tunnel could avoid many types of cumulative impacts. It bears emphasizing that the Cities of Glendale, La Canada Flintridge, and Los Angeles have stated their opposition to a surface or tunnel route for the SR-710 North Project. The City of Pasadena has stated its opposition to two proposed tunnel routes and two surface routes. Again, South Pasadena urges that a multi-modal alternative that does not include a freeway or a roadway tunnel be

Ronald Kosinski
Sep. 20, 2012
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identified as the preferred project for the SR-710 North.

Conclusion

We urge you to revise the DEIR/DEIS for the I-710 Corridor Project so that consideration of the potential cumulative impacts of the I-710 Corridor Project along with the impacts of the SR-710 North Project are not overlooked. The cumulative impacts of the two potential projects together must be acknowledged and analyzed in adequate detail. The mobility of the entire region is too important to be considered without an understanding of the cumulative effect of these two major projects.

Thank you for your consideration of these views.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas P. Carstens", with a horizontal line underneath.

Douglas P. Carstens