

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



June 1, 2015

Garrett Damrath  
Chief Environmental Planner  
Division of Environmental Planning  
Department of Transportation, District 7  
100 S. Main St, MS-16A  
Los Angeles, California 90012

**State Route 710 North Study Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings Comments**

Dear Mr. Damrath:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the State Route 710 North Study Project Draft Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation regarding the Freeway Tunnel Alternative. The impacts of this massive earth-moving alternative will have serious environmental and public impacts which cannot be mitigated. Therefore we ask Caltrans to remove the Freeway Tunnel Alternative from further consideration.

To effectively and efficiently accommodate regional and local north-south travel demands the project should prioritize moving people, rather than vehicles. The Freeway Tunnel Alternative is inconsistent with City of Los Angeles' ongoing efforts to emphasize transit over private automobile. Via the Freeway Tunnel Alternative, truck traffic will incur a 4 percent grade and will be forced to lower their gears and speeds that will produce higher PM and NOx levels. By utilizing tunnels, the project encourages automobile traffic increasing green house gas emissions, PM, NOx and other high criteria pollutants.

Portals and ventilation stacks along the tunnels will cause exhaust output into the community, including El Sereno and California State University Los Angeles areas. Additional exhaust will come from traffic on roadways leading to and from tunnels. Slow prevailing winds will lead to greatly reduce local air quality. Additionally, the Freeway Tunnel Alternative does not guarantee a reduction in traffic congestion and north-south travel times. It would simply shift existing traffic onto a newly created route without measurable improvements to the network or positive impact on local traffic.

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Other important priorities the 710 North Study should focus on are enhancing travel options for underserved communities, improving safety, minimizing environmental impacts, reducing surface street traffic, and providing transportation choices to the public. The DEIR is therefore deficient for not analyzing an alternative that supports these elements in unison. The Conservancy recommends a Multi-Modal Alternative be analyzed. The Multi-Modal Alternative should incorporate the following essential features: light rail transit, expanded bus service, local street network improvements, and bicycle transit.

Regional or high density population areas should be served and special attention be given to ensuring connectivity to both the existing and the planned local and regional transportation network to address the challenge of making public transportation convenient and accessible.

Please direct any questions and all future correspondence to Paul Edelman of our staff at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

LINDA PARKS  
Chairperson