

**STATE ROUTE 710 FREEWAY EXTENSION (ROUTE 10 TO
ROUTE 210) RECORD OF DECISION**

**RECORD OF COMMENTS RECEIVED ON THE EVALUATION
OF MULTI-MODE/LOW BUILD PROPOSALS - VOLUME III**

April 8, 1998

Prepared for:

*Federal Highway Administration
California Division
980 Ninth Street, Suite 400
Sacramento, CA 95814*

Prepared by:

*California Department of Transportation
Office of Environmental Planning
120 South Spring Street
Los Angeles, California 90012*

With assistance from:

*LSA Associates, Inc.
Caltrans Contract No. 42W793
LSA Project #CDT630*

RECORD OF COMMENTS RECEIVED ON THE EVALUATION OF ROUTE 710 MULTI-MODE/LOW BUILD PROPOSALS

This portion of the Route 710 Record of Comments includes comments received by Caltrans on the evaluation of the Multi-Mode/Low Build proposal submitted to Caltrans by the City of South Pasadena and their consultants Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart, Inc. (Glatting Jackson). The Multi-Mode/Low Build proposal was submitted to Caltrans for consideration on September 27, 1993, as part of the City of South Pasadena's testimony at the California Transportation Commission hearing for the Route 710 project. Caltrans then conducted an analysis of the Multi-Mode/Low Build proposal, comparing it to the Build Alternative (the Route 710 Meridian Variation Alternative) to determine how well the Multi-Mode/Low Build proposal meets the traffic needs of the Route 710 corridor. A draft "Low Build Evaluation" was completed by Caltrans in January, 1994, and distributed to the City of South Pasadena and other interested parties for review. A final evaluation was completed on February 25, 1994.

MULTI-MODE/LOW BUILD PROPOSAL

To ensure that the Multi-Mode/Low Build concept received a final comprehensive analysis, in September, 1995, the Federal Highway Administration (FHWA) directed the California Department of Transportation (Caltrans) to model another Multi-Mode/Low Build proposal, the No Build Alternative, and the Build Alternative using the latest practical techniques. The modeling effort was carried out by the Caltrans LARTS section, under the direction of the FHWA. The results of the modeling was presented in a report completed in April, 1996, and presented to the FHWA. On May 14, 1996, FHWA transmitted the April, 1996, "A Model Evaluation of the City of South Pasadena's Multi-Mode/Low-Build Proposal" report to the Advisory Council for Historic Preservation.

This latest Multi-Mode/Low Build proposal, like earlier analyzed Multi-Mode/Low Build proposals, fails to meet the project's purpose and need. The basic underlying reason for this is that a freeway lane can handle 2,000 vehicles per hour, whereas a surface street lane can handle about 600 vehicles per hour. Because of this vast capacity differential and the lack of a trend or means to change peoples' choice of transportation from the automobile to mass transit in Southern California, it is highly unlikely that a Multi-Mode/Low Build proposal could be developed that meets the project's purpose and need.

In summary, the Multi-Mode/Low Build proposal fails to solve the transportation problems to the study areas as identified in the purpose and need statement, specifically:

Transportation Issues	Build Alternative¹	Multi-Mode/ Low Build Proposal
Reduce local street congestion	Yes	No, Increases
Reduce circuitous trips (regional)	Yes	No
Completion of the freeway network	Yes	No
Completion of the HOV network	Yes	No

¹Depressed Meridian Variation Alternative Reduced with Shift

Promote carpools and vanpools	Yes	No, Decreases
Promote transit	Yes ¹	No, Decreases
Reduce single drive car trips	Yes ²	No, Increases
Reduce accident and fatality rates	Yes	No
Reduce air pollution	Yes ²	No

LARTS MODEL COMMENTARY

The following commentary on the Los Angeles Regional Transportation System (LARTS) models, its structure and application, is provided in order to address many of the general comments on modeling methodology. In the matrix of responses, the reader is referred back to this commentary, as appropriate. Responses to other comments are provided directly in the Response to Comments Matrix.

The LARTS model was used extensively for the analysis of various alternatives related to the Route 710 Extension. This model is essentially the same model used by the Los Angeles County Metropolitan Transportation Authority (LACMTA) and the Southern California Association of Governments (SCAG). It is a standard, four step, trip generation, trip distribution, modal split, and assignment process. The process addresses auto and commercial vehicle needs as well as multimodal travel needs.

The model and modeling process are designed to address strategic/corridor level transportation issues within the region. The technology reflected in the LARTS model is the technology in use in the vast majority of transportation planning agencies in the United States, Canada, and overseas. This is not to suggest that improvements are not possible or feasible, nor that some of the state-of-the-art modeling approaches suggested by the City of South Pasadena and their consultants could not be useful in Southern California. Although many analytical tools in use by traffic engineers and transportation planners could be improved, this does not mean that these tools are unacceptably flawed for use in transportation analyses today.

The LARTS model approach involved a multimodal analysis, which attempted to address issues of daily a.m. and p.m. peak hour flows. This process recognizes historical and existing travel habits and patterns, and uses these insights to estimate the impacts of changes to road and transit facilities and services. The level of detail provided in the multimodal analysis in general, and various transit facilities in particular, conforms to the data available to SCAG, LACMTA, and Caltrans, and is commensurate with the strategic/planning nature of the analysis. To a large extent the models reflect reasonable travel behavior, taking into consideration what is known about how people travel in North America.

The analysis process, used by SCAG, LACMTA and Caltrans (via LARTS), as well as most transportation planners, does not allow for a change in trip generation as a result of changes in alternatives being analyzed. Numerous alternatives related to the configuration of the

¹Rerouting of existing express bus services service to the new HOV lanes would increase transit ridership, and reduce drive alone vehicle trips.

²Except for NO_x

Route 710 Extension, the interchanges with Route 710, and even individual ramp options were analyzed. However, the nature of a regional/strategic planning model analysis precludes the analysis of traffic on local streets and, to some extent, even traffic flows on collectors. As such, alternatives aimed at impeding traffic flows on local subdivision roads and/or collectors were not considered appropriate in addressing the overall goal of the analysis, which was to improve the regional transportation system.

Most of the comments and correspondence received by on the Multi-Mode/Low Build proposals are from the City of South Pasadena and their consultants, although some letters are from elected officials and other interested parties. The comments have been summarized in a matrix that lists the commentor, the comment date, the issue noted in the comment, and (where applicable) a response to the comment. Each comment is numbered sequentially, with a prefix of "LB-" identifying it as a comment on Multi-Mode/Low Build proposal. The fourth column identifies the subject of the comment through the use of a coding system. The subject coding allows for future sorting or listing of comments by subject, if necessary. A listing of all subject codes is provided for reference on the page preceding the Response to Comments Matrix.

The comments are organized as follows:

Comment Nos.	Commentor
LB-1	Congressman Carlos J. Moorhead
LB-2 to LB-5	City of South Pasadena
LB-6 to LB-16	Glatting, Jackson, Kercher, Anglia, Lopez, Rhinehart (consultant to City of South Pasadena)
LB-17 to LB-100	Kimley-Horn and Associates (consultant to City of South Pasadena)
LB-101 to LB-113	City of South Pasadena letter to Mayor Richard Riordan
LB-114 to LB-130	City of South Pasadena
LB-131	City of South Pasadena letter to the Los Angeles County Metropolitan Transportation Authority (LACMTA)
LB-132 to LB-133	Congressman Carlos J. Moorhead letter to LACMTA
LB-134	LACMTA letter to City of South Pasadena
LB-135	City of South Pasadena letter to LACMTA
LB-136	Art Torres, California Senator
LB-137 to LB-140	California Initiative Delegation from the U.S. Department of Transportation
LB-141 to LB-142	City of South Pasadena
LB-143	City of Alhambra Department of Public Works

Comment Nos.	Commentor
LB-144-147	Gap in numbering
LB-148	City of South Pasadena letter to the California Transportation Commission
LB-149	City of South Pasadena letter to Caltrans-District 7
LB-150	City of South Pasadena letter to Caltrans-District 7
LB-151	City of South Pasadena letter to Caltrans
LB-152 to LB-153	Congressman James Rogan
LB-154	Congressmen Matthew Martinez and Esteban Torres
LB-155 to LB-157	State Assemblyman Bill Hoge
LB-158	State Assemblyman James Rogan
LB-159	City of South Pasadena
LB-160 to LB-170	National Trust for Historic Preservation
LB-171	Antonio Rossmann
LB-172 to LB-173	City of South Pasadena
LB-174	The 710 Opposition Coalition
LB-175	City of Los Angeles
LB-176	City of Pasadena
LB-177	City of South Pasadena
LB-178	City of Alhambra
LB-179	Richard Alatorre, L.A. City Councilman, Ann Marie Villicana, Pasadena Council member and Talmage Burke, Alhambra Mayor
LB-180 to LB-182	City of South Pasadena
LB-183	City of Alhambra
LB-184	City of Los Angeles
LB-185 to LB-186	City of Long Beach
LB-187 to LB-239	City of South Pasadena
LB-240	City of Commerce
LB-241 to LB-248	City of South Pasadena
LB-249	Jeff Kightlinger, Burke, Williams & Sorenson (Counsel for City of Alhambra)

Comment Nos.	Commentor
LB-250 to LB-254	City of South Pasadena
LB-255 to LB-257	Antonio Rossmann (Attorney for City of South Pasadena)
LB-258 to LB-261	City of South Pasadena
LB-262	City of Baldwin Park
LB-263 to LB-269	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart
LB-270	William J. York, Jr.
LB-271 to LB-273	C. Thomas Williams

List of Subject Codes

Subject Code	Subject
AL	Alternatives
AQ	Air Quality
BIO	Biological Resources
C/N	CEQA/NEPA Issues
CON	Construction Impacts
CH	Cultural/Historic
CIR	Circulation/Traffic
CUM	Cumulative Impacts
EN	Energy
FI	Fiscal Impacts
FU	Funding
GEO	Geotechnical
GI	Growth Inducement
HW	Hazardous Waste/Materials
HB	Housing/Business Relocation
LU	Land Use
MM	Mitigation Monitoring
NOI	Noise
NEI	Not EIR/EIS Issue
NR	No Response Necessary
OB	Objectives
OP	Opinion
PD	Project Description
PH	Phasing
PP	Public Participation
PS	Public Services & Utilities
PN	Purpose and Need
RD	Request for Data
TR	Transit
VIS	Visual Resources
WR	Water Resources
4F	Section 4(f)

Route 710 Multi-Mode/Low Build Evaluation

Response to Comments Matrix

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-1	Carlos J. Moorhead, Congressman	2/1/94	OP	Funding for 710 closure is remote; only solution is the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-2	City of South Pasadena	2/16/94	RD	Request for Los Angeles Regional Transportation System (LARTS) model plots.	Data was provided as requested.
LB-3	City of South Pasadena	2/22/94	TR	Report omits Blue Line ridership projections for "no freeway" alternative.	The analysis made no effort to limit the ridership on any transit line. The ridership on defined transit lines was based on the modal split models, and these are based on the network data, travel characteristic, modal characteristics, and socioeconomic and demographic data within the study areas.
LB-4	City of South Pasadena	2/22/94	CIR	Traffic modeling does not consider all of the possible manipulations; no adjustment for truck traffic concern regarding errors.	See LARTS Model Commentary on page 2.
LB-5	City of South Pasadena	2/22/94	OP	Concern regarding errors.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-6	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	PN	Multi-Mode/Low Build proposal is lacking in detail and preliminary engineering consistency; it also needs to be analyzed using a comparable time period to those of the previous "Build" alternatives.	Reasonably detailed traffic impacts/analyses of the multimodal analysis were conducted. The Echelon Traffic Impact Analysis Report of December, 1993, reports on detailed impact analyses using improved calibration models developed in part for the Pasadena General Plan preparation. The role of an impact analyses is not to address issues related to detailed engineering such as curb radii. These are issues to be addressed at the preliminary engineering level, once an alternative is chosen.
LB-7	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94		Multi-Mode/Low Build analytical capabilities need to be expanded to include specialists and state-of-the-art techniques	See LARTS Model Commentary on page 2.
LB-8	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	OP	Need for Multi-Mode/Low Build proposal to be evaluated by an independent "blue ribbon" committee.	Comment noted during decision making process. The Multi-Mode/Low Build proposal from South Pasadena was evaluated and determined not to meet the purpose and need. Please refer to the report, "A Model Evaluation of the City of South Pasadena's Multi-Mode/Low Build Proposal" (April, 1996).
LB-9	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	CIR	The Evaluation does not include "dynamic" impacts in its traffic modeling.	See LARTS Model Commentary on page 2.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-10	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	TR	The Evaluation does not include transit ridership statistics.	On page 6, the Evaluation refers to statistics taken from the FEIR for the Los Angeles Light Rail Transit Project conducted by Los Angeles County Transportation Commission, February, 1990.
LB-11	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	OB	The Evaluation does not understand the Multi-Mode/Low Build proposal's objective of changing the travel expectation in the future.	The Evaluation does not document their assertion that they will be able to change travel expectations. The Evaluation gives evidence that dynamic changes in travel habits within the corridor appear negligible (page 8)
LB-12	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	AL	The Evaluation does not allow for a way to balance the projected increase in traffic volumes against the increases in transit use that would offset them.	See LARTS Model Commentary on page 2.
LB-13	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	CIR	The Evaluation makes no reference to the Alameda Intermodal/Multi-Modal Corridor.	The Alameda Multimodal corridor was a part of the LARTS model analysis. Commentary was not provided since its impact on the Route 710 Extension alternative was not significant.
LB-14	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	CUM	The Evaluation does not weigh the community impact of the Build Alternative against the claimed traffic improvements.	The community impacts of the Build Alternative are addressed in the Final EIR/EIS and the Route 710 Freeway Mitigation Committee Report.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-15	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	FI	The Evaluation does not account for the Federal Highway Administration/Federal Transit Administration (FHWA/FTA) major investment policy regarding reduction highway/transit initiatives in the same corridor.	Caltrans completed a draft Major Investment Study (MIS) pursuant to 23 CFR 450.318 in December, 1994. The MIS concluded that the previous studies and public participation elements of the Route 710 Extension provided an analysis equivalent to the requirements of 23 CFR 450.318.
LB-16	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	2/11/94	CIR	The Evaluation lacks analysis of simple traffic engineering measures needed to mitigate the traffic capacity deficiencies attributed to the Multi-Mode/Low Build proposal.	The purpose of the Evaluation was to evaluate the extent to which the Multi-Mode/Low Build proposal meets the Corridor traffic needs, is feasible without extensive street reconstruction, and meets the goals of the Route 710 project.
LB-17	Kimley-Horn and Associates (herein referred to as Kimley-Horn)	2/18/94	RD	Request for a page reference in the Los Angeles County Transportation Commission's (LACTC) 30-Year Integrated Transportation Plan, April, 1992, regarding the comment that arterial street improvements have been incorporated into the 30-Year Plan.	The text regarding arterial street improvements in the 30-Year Plan was deleted from the final Multi-Mode/Low Build Evaluation Report.
LB-18	Kimley-Horn	2/18/94	RD	The Evaluation does not define what arterial facilities are included in the 30-Year Plan.	Los Angeles County Metropolitan Transportation Authority (MTA), through the 30-Year Plan and the seven year transportation improvement program (TIP), has defined arterial and other facilities that are programmed for construction/improvements. These are public records. Changes in funding are likely to affect the timing rather than the choice of roadway to be constructed/improved.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-19	Kimley-Horn	2/18/94	FU	The Evaluation does not indicate the funding shortfalls for the 710 Freeway and the Pasadena Blue Line.	See Response to Comment LB-18.
LB-20	Kimley-Horn	2/18/94	TR	The Evaluation does not cite the source of studies indicating minimizing the modal shift away from automobiles. The Blue Line has only been operating for a short time; however, mode shifts occur gradually over time.	A reference to two sources can be found on page 9 of the Evaluation: Long Beach Independent Press Telegram, October 14, 1993; Access No. 1, University of California Transportation Center, Berkeley, California, Fall 1992.
LB-21	Kimley-Horn	2/18/94	TR	The Evaluation does not reference the increased ridership on the Santa Clarita Line which occurred after the January, 1994, Northridge earthquake.	Page 8 of the Evaluation refers to the increased ridership. The ridership on the Santa Clarita line has nearly returned to its pre-earthquake level, and it continues to decline from this position. As such, the rail cars are running at considerably less than capacity, and it has been necessary to cut back the number of cars available for this line. The future of the Santa Clarita line is now being evaluated.
LB-22	Kimley-Horn	2/18/94	TR	The Evaluation uses "best guess" numbers provided by the Metropolitan Transportation Authority/Regional Commuter Council (MTA/RCC) regarding the Blue Line ridership projections for the year 2010.	Pages 5-6 of the Evaluation refers to statistics taken from the FEIR for the Los Angeles Light Rail Transit Project conducted by LACTC, February, 1990. The Blue Line ridership projections were based on data available at the time the Evaluation was written. There have been numerous changes to rail line extensions and associated ridership levels. These changes will continue as MTA and other agencies address changing political, social, environmental, financial, and other factors.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-23	Kimley-Horn	2/18/94	CIR	The LARTS model does not reflect the new ridership numbers or demonstrate the capacity of the Blue Line.	See LARTS Model Commentary on page 2.
LB-24	Kimley-Horn	2/18/94	FU	The Evaluation does not indicate that MTA is struggling with a \$126,000,000 annual operational shortfall and that it does not foresee funding for the 710 Extension.	Text regarding funding has been removed from the Evaluation Report, since financial feasibility was not one of the objectives of the Evaluation.
LB-25	Kimley-Horn	2/18/94	OP	The Multi-Mode/Low Build proposal incorporates the same features as the 710 Freeway.	Comment noted during decision making process.
LB-26	Kimley-Horn	2/18/94	CIR	The LARTS model does not account for trip generation changes as compared to Meridian Variation and No Build alternatives nor does it include trip distribution changes.	See LARTS Model Commentary on page 2.
LB-27	Kimley-Horn	2/18/94	TR	The LARTS model does not analyze the Blue Line based on capacity; no transit service enhancements were added.	See LARTS Model Commentary on page 2.
LB-28	Kimley-Horn	2/18/94	CIR	The LARTS model does not include the Hellman and 710 Freeway ramp which serves California State University at Los Angeles.	Caltrans has reviewed the numerous network analyses, which show that the ramp at Hellman and Route 710 was included in the model analyses.
LB-29	Kimley-Horn	2/18/94	CIR	The LARTS model does not include an adjustment of the freeway segment in Pasadena to reflect the ramp system proposed.	Caltrans' reviews of the numerous network analyses indicates that the proposed freeway in Pasadena was adjusted repeatedly to reflect various ramp systems including the ones identified in the Multi-Mode/Low Build proposal.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-30	Kimley-Horn	2/18/94	CIR	The LARTS model does not make adjustments to travel speed.	See LARTS Model Commentary on page 2.
LB-31	Kimley-Horn	2/18/94	CIR	The LARTS model does not adjust for traffic calming strategies.	See LARTS Model Commentary on page 2. "Traffic calming" has not been accepted as a traffic management practice in the United States.
LB-32	Kimley-Horn	2/18/94	AL	The Evaluation does not include the No Build Alternative as an option, nor does it include a cost benefit of the three alternatives.	The objective of the Evaluation was to analyze how well the Multi-Mode/Low Build proposal met the Corridor traffic needs compared to the Build Alternative, not the No Build Alternative.
LB-33	Kimley-Horn	2/18/94	CIR	The Evaluation should include increases from traffic in the No Build Alternative compared to the Multi-Mode/Low Build proposal and Build Alternative.	See Response to Comment LB-32.
LB-34	Kimley-Horn	2/18/94	CIR	The Evaluation does not indicate that the local street system will not significantly improve the Build Alternative.	The Echelon report does not state or imply that the "local street system does not significantly improve the 710 Extension." The December, 1993, Echelon report shows that arterial, collector and other streets will be affected by the Multi-Mode/Low Build proposal. The November, 1992, Echelon report indicates that the LARTS model does not address local street impacts because of the nature of the model. However, if the changes in arterial flows are considered (as a surrogate) for local traffic, then it is clear that local roadways will be affected by some changes in freeway design.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-35	Kimley-Horn	2/18/94	CIR	Echelon's report indicates local street congestion will remain unchanged with the Build Alternative; the Build Alternative does not include residential traffic calming.	See Response to Comment LB-34.
LB-36	Kimley-Horn	2/18/94	CIR	The Build Alternative creates circuitous routing for trucks due to the truck ban. The Multi-Mode/Low Build proposal allows for truck movement directly into Alhambra's planned industrial complex.	The truck ban was proposed by the Route 710 Mitigation and Enhancement Advisory Committee. This committee was composed of representatives of the communities involved in the Route 710 Extension. Trucks making deliveries to their destinations will have essentially the same kind of routings as they have today.
LB-37	Kimley-Horn	2/18/94	CIR	The Circulation Master Plan (CMP) lists the Fremont Corridor as available for car and van pooling. The arterial street system is currently used by car and van pools.	The high occupancy vehicle (HOV) network referenced is the network of planned HOV lanes on the freeway system.
LB-38	Kimley-Horn	2/18/94	CIR	The Multi-Mode/Low Build proposal does not restrict car and van pooling; nor does the Build Alternative.	Comment noted. No change made to the report text.
LB-39	Kimley-Horn	2/18/94	TR	The 710 Freeway will duplicate the investment in the Pasadena Blue Line.	As noted in the Final EIR/EIS the 710 Freeway and the Pasadena Blue Line are both components of the transportation system improvements needed to meet future travel demand.
LB-40	Kimley-Horn	2/18/94	CIR	The Build Alternative will promote single-occupancy vehicles since six of the eight lanes are general purpose lanes.	HOV lanes are proposed in addition to the general purpose lanes in the Build Alternative.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-41	Kimley-Horn	2/18/94	CIR	The Evaluation Report does not address accident and fatality rates of the local street system in the corridor.	A safety study of the local street system was not completed; however, as noted on page 24 of the Evaluation, freeway travel is statistically safer than non-freeway travel.
LB-42	Kimley-Horn	2/18/94	EN	The Evaluation Report shows that energy consumption will increase on the 710 Freeway during off-peak hours. The transit component of the Multi-Mode/Low Build proposal provides additional energy savings.	As noted on page 42 of the Evaluation, the analysis of the network <u>as a whole</u> , shows the Multi-Mode/Low Build proposal is worse for total daily consumption.
LB-43	Kimley-Horn	2/18/94	AQ	The Build Alternative does not reduce the amount of air pollutants; the Multi-Mode/Low Build proposal does.	Page 41, Table 4 of the Evaluation compares the amount of air pollutants created by the Build Alternative and Multi-Mode/Low Build proposal. Some emissions are higher under the Build Alternative, while others are higher under the Multi-Mode/Low Build proposal.
LB-44	Kimley-Horn	2/18/94	CIR	The Evaluation should include the following transportation criteria: truck access, discouraging transit use, public safety access, traffic noise impacts on schools, traffic calming in residential areas.	These criteria were not added since they were not part of the Evaluation objectives.
LB-45	Kimley-Horn	2/18/94	OP	Referring to the Build Alternative as the better transportation alternative is purely subjective and not proven by quantifiable data.	The Build Alternative is the better transportation alternative since it better meets the traffic needs in the 710 corridor.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-46	Kimley-Horn	2/18/94	OP	The assertion that the Multi-Mode/Low Build proposal provides some limited local benefit is subjective and not proven by quantifiable data.	Comment noted. The Multi-Mode/Low Build evaluation did not attempt to quantify the benefits of every component of the Multi-Mode/Low Build proposal.
LB-47	Kimley-Horn	2/18/94	OP	The assertion that the Multi-Mode/Low Build proposal will not meet regional mobility needs is also subjective. The Evaluation does not identify what the regional mobility needs are.	<p>The Regional Mobility Element (RME) prepared by Southern California Association of Governments (SCAG), a publicly available document, identifies that "the core of the RME is the planned improvements to highways, rail and bus transit, ports, truck facilities, and aviation facilities that county transportation commissions, the State and other agencies have committed to fund over the next 30 years to better move people and goods." The core element is surrounded by more detailed subgoals, one of which is to "sustain or better the 1990 levels of service for the movement of people and goods."</p> <p>The levels of service analyses conducted for the Evaluation supports the statement that the Multi-Mode/Low Build improvements "simply do not meet the Regional Mobility needs" as defined above.</p>
LB-48	Kimley-Horn	2/18/94	CIR	The Evaluation identifies the Fremont Avenue Corridor as being the only north-south facility in the West San Gabriel Valley.	Page 45 of the Evaluation indicates that Fremont Avenue is one of many north-south roads that will increase in traffic volume.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-49	Kimley-Horn	2/18/94	CIR	The Evaluation refers to Huntington Drive as "a major bottleneck"; however, it does not define the term.	The comments regarding Huntington Drive relate to its future performance. This would be an area of restricted traffic flow caused by vehicular congestion.
LB-50	Kimley-Horn	2/18/94	CIR	The Evaluation indicates that traffic must traverse mostly residential neighborhoods. The Evaluation should include a map of the major arterial roads with the existing and planned land uses shown.	Land use data for the study area is provided in the Final EIR/EIS.
LB-51	Kimley-Horn	2/18/94	OP	The Evaluation should complete an origin and destination study of cars at the Valley Boulevard and the Pasadena ramps at the current 710 termini.	Such a study is far beyond the scope of the Evaluation.
LB-52	Kimley-Horn	2/18/94	OP	The Evaluation uses editorial terminology without providing quantifiable data or material.	Comment noted during decision making process.
LB-53	Kimley-Horn	2/18/94	OP	The Evaluation states that 24 alternatives have been considered; however, it does not identify that the alternatives are variations on three basic alignments.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-54	Kimley-Horn	2/18/94	CIR	The Evaluation states that traffic would be confined to a regional facility; however, it does not provide any data or information. Echelon's work indicated that the Build Alternative will not significantly improve the local street traffic.	The Echelon report indicates that, without the Route 710 Freeway Extension or with a scaled down freeway extension, the traffic in the community arterials and collectors would increase. As traffic on the arterials and collectors increase, levels of service on the facilities will worsen. As this happens, traffic will find ways to penetrate neighborhoods. This is already a phenomenon in many communities in North America.
LB-55	Kimley-Horn	2/18/94	CH	The Evaluation does not indicate that the FHWA is prohibited from approving the Record of Decision (ROD) without approval from the President's Council on Environmental Quality (CEQ). The Evaluation does not indicate that the CEQ requires a resolution regarding the impacts on the historic resources.	These statements, while true, are irrelevant to the objectives of the Evaluation.
LB-56	Kimley-Horn	2/18/94	CIR	The Evaluation does not indicate which recommendations were not recommended to the CTC and FHWA.	Implementation commitments and mechanisms regarding recommendations on the project are described on page IV-6 of the Advisory Committee's Final Report.
LB-57	Kimley-Horn	2/18/94	RD	The Evaluation does not include the financing plan for the 710 Freeway required for FHWA approval.	The Multi-Mode/Low Build Evaluation was not intended to address the financing plan for the Route 710 Extension.
LB-58	Kimley-Horn	2/18/94	OP	The Evaluation states that the Multi-Mode/Low Build proposal identifies 16 issues, which were actually issues identified in the Draft EIR.	Comment noted. A summary of the issues is provided on page vi of the final Multi-Mode/Low Build Evaluation Report.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-59	Kimley-Horn	2/18/94	OP	The Evaluation continues to make editorial comments.	Comment noted during decision making process.
LB-60	Kimley-Horn	2/18/94	CIR	The Evaluation does not indicate which additional issues not included in the Glatting Jackson's action plan are addressed.	An updated discussion of methodology is provided on page 2 of the Evaluation.
LB-61	Kimley-Horn	2/18/94	OP	Multiple agencies and key legislators support the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-62	Kimley-Horn	2/18/94	OP	The Evaluation should indicate that Caltrans refused to include certain modeling assumptions as suggested by Kimley-Horn.	See Response to Comment LB-60.
LB-63	Kimley-Horn	2/18/94	RD	Request for a page reference in the Los Angeles County Transportation Commission 30-Year Integrated Transportation Plan, April, 1992, regarding the comment that the Pasadena Blue Line is independent of the Route 710 debate.	The 30-Year Plan provides tables and charts showing the implementation of both of the Pasadena Blue Line and the Route 710 Extension.
LB-64	Kimley-Horn	2/18/94	TR	The Evaluation needs to indicate that the LARTS model did not include certain Blue Line assumptions in its analysis of the Build Alternative or Multi-Mode/Low Build proposal.	See the LARTS Model Commentary on page 2.
LB-65	Kimley-Horn	2/18/94	TR	The City of South Pasadena has already corrected its misstatement regarding ridership capacity.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-66	Kimley-Horn	2/18/94	TR	The City of South Pasadena is currently reviewing a DEIR for the extension of the Blue Line from Pasadena to the east San Gabriel Valley.	Comment noted during decision making process.
LB-67	Kimley-Horn	2/18/94	CIR	The Southern California Association of Governments (SCAG) Origin-Destination Survey of 1991 does not focus on other trips. The Survey's conclusion of moving away from the construction of freeways does not justify the construction of the Build Alternative.	Comment noted during decision making process.
LB-68	Kimley-Horn	2/18/94	CIR	The Evaluation does not include the Origin-Destination Survey conducted in 1982.	See the LARTS Model Commentary on page 2.
LB-69	Kimley-Horn	2/18/94	TR	The Evaluation does not indicate that the Long Beach Blue Line competes with parallel freeways which is similar to the Pasadena Blue Line competing with the Build Alternative.	The nature of the travel demand that typically encourages or precipitates a freeway or commuter rail line also engenders some competition. The reason for this is that there will still be individuals who need their autos and commercial traffic that needs to be accommodated.
LB-70	Kimley-Horn	2/18/94	TR	An additional 19,000 daily trips will be added due to the extension of the Pasadena Blue Line into the San Gabriel Valley.	The future of the Pasadena line is being reviewed, and extensions of the Pasadena line into the San Gabriel Valley do not negate the ridership projections on the Route 710 Extension. This is based on SCAG, MTA, and LARTS based analyses.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-71	Kimley-Horn	2/18/94	RD	The Evaluation does not define the term "drastic measure" as referred to on page 9.	Drastic measures to encourage massive change in modal split include such considerations as road pricing, major road closures (such as that produced by the Northridge earthquake), municipal control of the majority of the off-road parking, massive increases in auto license fees, increasing transit capital and operating expenditures five to ten fold, etc.
LB-72	Kimley-Horn	2/18/94	TR	The Evaluation does not explain the comment "...adequate bus capacity along the proposed Blue Line corridor."	Page 10 of the Evaluation indicates that new bus service operates in the afternoon period to avoid duplicate service provided by other bus lines in the area.
LB-73	Kimley-Horn	2/18/94	CIR	The Evaluation's assertion that "motorists are forced to take either circuitous freeway routes or local streets to their destinations" is based on a 1982 study which is outdated and incomplete.	The higher vehicle miles traveled (VMT) noted on page 35 of the Evaluation indicates that more circuitous routing occurs.
LB-74	Kimley-Horn	2/18/94	RD	Request for a page reference and source regarding the statement, "...50,000 trips a day enter the Los Angeles Central Business District (LACBD) that would have used Route 710 if the gap were closed."	The 50,000 estimate is based on various LARTS model runs, including the modeling work for the Long Range Circulation/Access for Los Angeles Central Business District (LACBD) (April, 1990).
LB-75	Kimley-Horn	2/18/94	RD	Request for information regarding which regional areas were not addressed in the Multi-Mode/Low Build proposal.	The Route 710 analysis encompassed the entire SCAG Region. The multimodal analysis focused on the communities within the environs of the Route 710 Extension corridor.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-76	Kimley-Horn	2/18/94	CIR	The Evaluation does not provide data to support its statement regarding the effectiveness of the 710 extension to Mission Road.	The Echelon December, 1993, report indicates that, in relative terms, the Multi-Mode/Low Build proposal will result in increased congestion at the referenced intersections.
LB-77	Kimley-Horn	2/18/94	LU	The extension of the freeway to Mission Road would terminate in an industrial area, not residential.	Correction noted.
LB-78	Kimley-Horn	2/18/94	HB	The Multi-Mode/Low Build proposal proposes no displacement of any homes. The industrial complexes to be displaced are already owned by Caltrans.	Caltrans stands by its conclusion that some residential displacements may be required, as stated on page 43 of the Multi-Mode/Low Build Evaluation Report.
LB-79	Kimley-Horn	2/18/94	CIR	The Evaluation indicates that the City of Alhambra objects to the Hellman Avenue ramps at California State University at Los Angeles; however, the City did not object at the Route 710 Mitigation Committee meetings. Why?	The discussion of the Hellman Avenue ramps has been removed from the final Multi-Mode/Low Build Evaluation Report dated February 25, 1994.
LB-80	Kimley-Horn	2/18/94	CIR	Request for text correction in the Evaluation Report regarding the interchange spacing proposed by Caltrans.	The text regarding interchange spacing has been deleted from the Multi-Mode/Low Build Evaluation Report.
LB-81	Kimley-Horn	2/18/94	OP	Caltrans and the City of Alhambra should conduct origin and destination studies regarding traffic circulation in the City of Alhambra. Request for text addition that the Multi-Mode/Low Build proposal is not responsible for the City of Alhambra's continued development.	Comment noted. The requested text was not added since it does not pertain to the objectives of the Multi-Mode/Low Build Evaluation.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-82	Kimley-Horn	2/18/94	CIR	The Evaluation does not include the Park/Access Improvement Zone (PAIZ) strategy outlined in the Multi-Mode/Low Build proposal.	The PAIZ strategy involves traffic management techniques such as rear access, pocket parking, directional signs, and planted medians. These "micro-level" techniques cannot be analyzed at the regional, systemwide level that was analyzed in the Multi-Mode/Low Build Evaluation.
LB-83	Kimley-Horn	2/18/94	CIR	The Evaluation does not model the Multi-Mode/Low Build proposal solutions for the transition between Huntington Drive, Fremont and Fair Oaks Avenues.	See the LARTS Model Commentary on page 2.
LB-84	Kimley-Horn	2/18/94	CIR	Request for text clarification in the Evaluation Report regarding the Multi-Mode/Low Build proposal which does not design Fremont Avenue to carry freeway volumes or traffic.	Page 44 of the Evaluation discusses the capacity of Fremont Avenue.
LB-85	Kimley-Horn	2/18/94	OP	The Evaluation continues to use editorial comments.	Comment noted during decision making process.
LB-86	Kimley-Horn	2/18/94	CIR	The Evaluation should indicate that Caltrans studies have shown that the Build Alternative will severely impact the 210 Freeway, especially at peak commute times.	In the Final EIS, the volume of traffic on Route 210 is slightly lower for the Meridian Variation Alternative (Figure I-4) than for the No Build Alternative (Figure I-3).
LB-87	Kimley-Horn	2/18/94	CIR	The Evaluation does not make adjustments for the ramp system at the northern terminus as proposed in the Multi-Mode/Low Build proposal.	See the LARTS Model Commentary on page 2.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-88	Kimley-Horn	2/18/94	CIR	The Multi-Mode/Low Build proposal is capable of incorporating any Transportation Systems Management (TSM) or SMART Corridor systems planned for the Build Alternative.	Page 17 of the Evaluation includes an updated discussion of Caltrans' role in SMART Street systems.
LB-89	Kimley-Horn	2/18/94	RD	Request for a list of the arterial streets in the San Gabriel Valley with their current operating and potential capacity.	The Echelon December, 1993, report shows intersections operating at or near capacity.
LB-90	Kimley-Horn	2/18/94	RD	Request for a list of the "various street improvements...included in the MTA's 30-Year Plan to reduce traffic congestion." Request for the current and projected funding status of these improvements.	The list of street improvements is constantly changing as dictated by local needs and funding availability. The most recent Los Angeles County TIP available from MTA lists currently programmed street improvements.
LB-91	Kimley-Horn	2/18/94	CIR	The Evaluation should indicate that the Figueroa Corridor had not yet been identified when the 30-Year Plan was first created.	The Figueroa Corridor and other corridors, rail lines, individual roadway changes, etc. will continue to be reviewed and reevaluated with the 30-Year Plan. This will occur as a result of changing priorities, revenues, etc.
LB-92	Kimley-Horn	2/18/94	FU	The Evaluation should indicate that the MTA is revising the 30-Year Plan due to funding shortfalls and over-ambitious programs.	See Response to Comment LB-90.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-93	Kimley-Horn	2/18/94	RD	Request for data from the State of California regarding accident rates (by type of vehicle that would have used the freeway or local streets) in El Sereno, Alhambra, San Marino, South Pasadena and Pasadena areas. The data should be compared to the freeways.	<p>An analysis was done by Echelon to assess the impacts of various Route 710 alternatives on accidents (Echelon Traffic Impacts, November, 1992). This analysis differentiated between arterial and freeway related accidents. The rates used were supplied by the State through the Office of Traffic Safety and Caltrans. The analysis also considered accidents in terms of property damage only and fatalities. It should be noted that the accident rates on arterials are many times higher than the accident rates on freeways.</p> <p>Alternatives that increase arterial flows will generate more accidents than alternatives that increase freeway flows, all other factors being equal.</p>
LB-94	Kimley-Horn	2/18/94	TR	The Evaluation does not acknowledge San Gabriel Valley's significant interest in extending the Blue Line.	Comment noted.
LB-95	Kimley-Horn	2/18/94	FU	The Evaluation should indicate the amount of funds that have been spent by Caltrans in purchasing right-of-way for the Build Alternative.	This information is not relevant to the objectives of the Evaluation, which were to determine whether the Multi-Mode/Low Build proposal satisfies the traffic needs in the 710 Corridor.
LB-96	Kimley-Horn	2/18/94	RD	Request for data regarding the number of miles that the Build Alternative that would be 142 feet in width and the number of miles that would exceed 142 feet.	The Build Alternative footprint is 142 feet wide except at the on-ramp/off-ramp locations, where the width varies.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-97	Kimley-Horn	2/18/94	CIR	The Evaluation should state that the Build Alternative works against multi-modal approaches by banning truck traffic and providing only one "park-and-ride" facility at Huntington Drive.	The Build Alternative's multi-modal components are discussed on page 26 of the Evaluation. The multimodalism of the Build Alternative is evidenced by its use of freeways, arterials, collectors, local roadways, regularly scheduled fixed route buses, shuttle buses (both private and public), vans, bikeways, intercity and intracity commuter rail operations, carpool and van pool facilities, and commercial vehicle operations on all facilities, with some restrictions as to the types of commercial vehicles that will use certain classes of facilities.
LB-98	Kimley-Horn	2/18/94	RD	Request for a page reference in the 30-Year Plan regarding the improvements of the Multi-Mode/Low Build proposal.	The referenced text regarding Multi-Mode/Low Build components in the 30-Year Plan has been deleted.
LB-99	Kimley-Horn	2/18/94	CIR	The Evaluation should indicate that no significant improvement in local roadways will occur with the Build Alternative, according to the Echelon Report.	The Echelon report indicates that numerous local roadways will experience reductions, in both relative and absolute terms, in traffic flows and improvements in level of service as a result of the Route 710 Extension.
LB-100	Kimley-Horn	2/18/94	OP	The LARTS model relies on past trends to forecast the future. It is not capable of adjusting for lifestyle and mode changes.	Comment noted during decision making process. The LARTS model used for the study is an acceptable model used by SCAG and produces acceptable results.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-101	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	FU	The Multi-Mode/Low Build proposal is estimated at \$110 million and can be self funded.	Comment noted during decision making process. These are the City of South Pasadena's responses to the City of Los Angeles' comments dated 10/25/93 (see Comment LB-184).
LB-102	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	FU	The Build Alternative was to be funded from the State's Flexible Congestion Relief (FCR) Program which has been postponed until 1996, pending new sources of funds. MTA is currently revising the 30-Year Integrated Plan due to funding shortfalls.	Comment noted during decision making process.
LB-103	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	TR	The Multi-Mode/Low Build proposal provides 1.7 million daily person-trips of new capacity.	Comment noted during decision making process.
LB-104	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	TR	The Multi-Mode/Low Build proposal proposes to increase the capacity of the 710 corridor through a combination of management and public transit actions. It will require virtually no street widening.	Comment noted during decision making process.
LB-105	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	CIR	The 710 Freeway will compete directly with the Pasadena Blue Line based on the 1982 origin and destination data.	Comment noted during decision making process.
LB-106	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	FU	The Multi-Mode/Low Build proposal would be eligible for FCR funds (as would the Build Alternative) and surplus property funds.	Comment noted during decision making process.
LB-107	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	PD	Similar to the Build Alternative, the Multi-Mode/Low Build proposal is considered a Federal and State project.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-108	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	PD	The Multi-Mode/Low Build proposal requires no significant street widenings. The Multi-Mode/Low Build proposal can be completed by the year 2002; however, the Build Alternative won't be opened until the year 2025.	Comment noted during decision making process.
LB-109	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	CIR	The Build Alternative will not significantly relieve local traffic congestion according to Caltrans data.	Please see Response to Comment LB-99. In addition, it should be noted that, notwithstanding the significant benefits that the Route 710 Extension will have on local traffic congestion, no freeway or other individual roadway change can solve all localized traffic problems.
LB-110	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	CIR	The Multi-Mode/Low Build proposal provides more travel capacity than the Build Alternative through the improvement of surface arterial roads and the expansion of public transit.	Comment noted during decision making process.
LB-111	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	FI	The Multi-Mode/Low Build proposal is more cost effective than the Build Alternative.	Comment noted during decision making process.
LB-112	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	OP	The Multi-Mode/Low Build proposal anticipates the next source of travel capacity that has a "future" in the region.	Comment noted during decision making process.
LB-113	City of South Pasadena letter to Mayor Richard Riordan	2/7/94	OP	The Multi-Mode/Low Build proposal provides a variety of benefits to a wide-range of recipients.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-114	City of South Pasadena	2/18/94	CIR	Traffic data presented in the FEIS does not support FEIS conclusions.	<p>This comment seems to question the level of detail provided for the no project alternative relative to the Meridian alternative, and that the difference in level of detail makes the comparisons suspect. It should be noted that numerous alternatives were considered and many were rejected.</p> <p>If, in the initial phases of the analysis (where the level of detail was not as extensive as in the latter stages of the analyses), an alternative did not address the goals of the program, it was dropped from further consideration. Producing additional detail would not change this conclusion.</p> <p>The other pertinent aspect of this comment is the conclusion that arterial volumes would not be reduced as a result of the Route 710 Extension. The Echelon report and Response to Comment LB-99 address this issue.</p>
LB-115	City of South Pasadena	2/18/94	TR	The Multi-Mode/Low Build proposal suggests that the frequency of service on the Pasadena Blue Line is far greater than the frequency presented in the 30-Year Integrated Transportation Plan.	As noted on page 6 of the Evaluation, MTA staff indicates that the realistic capacity of the Pasadena Blue Line is about 70,000 passengers per day.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-116	City of South Pasadena	2/18/94	CIR	In the Caltrans analysis of the shift from automobile to light rail, would a peak period comparison yield the same conclusion?	The clearly discernible trend in the United States over the last 15-25 years has been a shift away from public transit. Public transit ridership continues to decline in 1995. Of course, there are some communities where transit ridership is on the increase and rail commuter ridership in many areas is increasing, but overall transit ridership is not. This conclusion is the same whether the analysis period is a.m., p.m. or daily.
LB-117	City of South Pasadena	2/18/94	TR	MTA's projections of the Pasadena Blue Line does not include the higher frequency of service as suggested in the Multi-Mode/Low Build proposal or assume that the Build Alternative would not be constructed.	Ridership projections and capacity of the Pasadena Blue Line are addressed on pages 3-7 of the Evaluation. The frequency or headway for the Blue Line or any other transit line modeled with LARTS is determined by the MTA, i.e., the agency that is intimately familiar with the existing and potential operating characteristics of that line.
LB-117 (cont.)	City of South Pasadena (cont.)				Headways are set by the MTA to address ridership levels in the most cost effective way. The headway also reflects the technologies employed in the system, the supporting services, the existing ridership patterns and trends, and the socioeconomic and demographic characteristics in the corridors.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-118	City of South Pasadena	2/18/94	PN	The Multi-Mode/Low Build proposal is considered multi-modal and would encourage a shift away from the single occupant vehicle to alternative modes of transportation.	The Build Alternative is also multi-modal, as discussed on page 26 of the Evaluation. The purpose of the Route 710 Extension analyses was to analyze the extension of Route 710 and not necessarily develop a plan for the region. If a critical goal for the region would be to create a significant modal shift, clearly there would be numerous possibilities and opportunities for creating different transportation plans, plans where multimodal solutions would predominate.
LB-119	City of South Pasadena	2/18/94	RD	The Evaluation does not define the term "drastic measures."	See Response to Comment LB-71.
LB-120	City of South Pasadena	2/18/94	CIR	Do the VMT, VHT, VHD and air pollution levels change during peak or off-peak periods? Would modified model assumptions to the Multi-Mode/Low Build proposal yield the same results?	See the LARTS Model Commentary on page 2. It is important to restate that present and predominant transportation modeling practices do not adjust trip generation or the number of trips in response to congestion. However, trips are reduced over time in response to changing dwelling unit occupancies, car ownership, car occupancies, and so on. As integrated transportation/land use models become more acceptable and credible and the impacts of congestion on trip generation become more understood, the likelihood of their usage will increase.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-121	City of South Pasadena	2/18/94	CIR	Would the daily traffic volumes for both north-south and east-west roads be affected during peak periods? Would modified model assumptions to the Multi-Mode/Low Build proposal yield different results?	Modifying some of the model's assumptions or structures would in some cases yield different results and in some cases will not yield different results. The impact on the results will depend on the assumptions changed and the reasonableness of the changes. The purpose of the Route 710 Extension analysis was not to test alternative modeling concepts or structures.
LB-122	City of South Pasadena	2/18/94	PN	The Multi-Mode/Low Build proposal's transportation goals are listed and comments presented in Table 3.	The referenced table has been modified on page vi of the Evaluation to address some of the points in this comment.
LB-123	City of South Pasadena	2/18/94	CUM	The Evaluation does not indicate what environmental and economic consequences will be deemed acceptable.	The Final EIR/EIS addresses the environmental and economic impacts of the Build Alternative compared to other alternatives.
LB-124	City of South Pasadena	2/18/94	CIR	The Evaluation does not support its statement that the regional mobility needs will be solved by the proposed Route 710 Extension.	The analysis of various performance indicators provided in the Evaluation Report forms the basis for the conclusion that the Route 710 Freeway extension is the better transportation alternative.
LB-125	City of South Pasadena	2/18/94	CIR	Differences in traffic volumes between the Multi-Mode/Low Build proposal and the Build Alternative on east-west and north-south arterial roads are noted.	Specific responses to the traffic volume differences are not provided in the Evaluation. The Evaluation was focused on a systemwide analysis, rather than a link-by-link analysis.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-126	City of South Pasadena	2/18/94	CIR	The traffic volumes in the Build Alternative in the Caltrans Evaluation differ from those in the Final EIS.	These have been numerous LARTS model runs conducted for the Route 710 Extension analysis. Most, if not all of these, are documented in the various supporting/technical documents to the Final EIS.
LB-127	City of South Pasadena	2/18/94	CIR	Data presented in the Final EIS indicates that approximately 37,000 north-south trips will be added to local arterial roads north of I-210/Route 134.	Even with the Build Alternative, additional trips will be added to local arterial roads as a result of ongoing growth in the region.
LB-128	City of South Pasadena	2/18/94	CIR	The Final EIS and the Evaluation state that the Build Alternative will provide substantial relief to the freeway systems in the area; however, the average daily traffic (ADT) and peak period data presented in the Evaluation fails to substantiate this assertion.	The Multi-Mode/Low Build Evaluation Report provides a comparison of 2010 ADT volumes for the Build Alternative vs. the Multi-Mode/Low Build proposal for east-west roads (Table 6) and north-south roads (Table 7). These tables show that the Build Alternative provides a greater benefit (i.e., overall reduction in volumes) to the regional highway system.
LB-129	City of South Pasadena	2/18/94	CIR	The Multi-Mode/Low Build proposal was introduced as a viable alternative and the City of South Pasadena has produced a preliminary study to define the concept; however, it is the project proponent's responsibility to analyze feasible alternatives during the environmental review process.	Caltrans has studied 16 "Low-Build" or partial completion proposals in past environmental documents. They were discussed in the Final EIR/EIS and can be found starting on page II-111 of the Final EIR/EIS. Caltrans' primary reason for rejecting the "Low-Build" or partial completion proposals was that they had insufficient traffic capacity to meet local and regional demand.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-130	City of South Pasadena	2/18/94	CIR	The modeling assumptions used for the Multi-Mode/Low Build proposal do not represent the future of multimodalism as envisioned by the Multi-Mode/Low Build proposal. The Multi-Mode/Low Build proposal, with a few improvements and adjustments, could accommodate future ADT up to the year 2010.	Multimodalism and the transportation modeling assumptions agreed to for the Evaluation are discussed on pages 26-31 of the Evaluation.
LB-131	City of South Pasadena letter to Los Angeles County Metropolitan Transportation Authority (- MTA)	10/6/93	PN	The Build Alternative will destroy South Pasadena's community and its neighbors. The Multi-Mode/Low Build proposal is a way to break the institutional gridlock that has plagued the project.	This is a transmittal letter; comment noted during decision making process.
LB-132	Carlos J. Moorhead, Congressman letter to MTA	9/20/93	PN	Has the MTA reviewed the Multi-Mode/Low Build proposal as an alternative to the Build Alternative?	See Response to Comment LB-129; MTA reviewed all alternatives contained in the Route 710 Extension Final EIS.
LB-133	Carlos J. Moorhead, Congressman letter to MTA	9/20/93	FU	Can the MTA provide assurance that the Build Alternative will receive the state's financial backing? How much of the funds allocated through the 1992 STIP process remain?	Financial backing cannot be "assured" for any project; however, a Financial Plan will be developed as a part of the final design process. Approximately \$5 million remains from funds allocated through the 1992 STIP process.
LB-134	MTA letter to City of South Pasadena	10/21/93	FU	Proceeds generated from the sale of Caltrans' surplus properties must be returned to the State Highway Account and/or FHWA.	Comment noted during decision making process.
LB-135	City of South Pasadena letter to MTA	9/30/93	OP	Funding and completion of the Build Alternative is remote. The Multi-Mode/Low Build proposal could be funded from the sale of surplus properties.	No response required. MTA responded in their letter of 10/21/93 (see Comment No. LB-134).

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-136	Art Torres, California Senator	6/29/93	OP	The Multi-Mode/Low Build proposal is a cost effective method to solving local traffic problems.	Comprehensive analysis performed by Caltrans and FHWA show the Build Alternative to be more cost-effective than the No Build Alternative and the Multi-Mode/Low Build proposal. Also, please refer to the Environmental Reevaluation (April, 1998) for a discussion of impacts and benefits of the project.
LB-137	California Initiative Delegation from the U.S. Dept. of Transportation	7/24/93	OP	The Multi-Mode/Low Build proposal provides many benefits, such as providing immediate relief to existing congestion in the corridor, imposes limited and acceptable environmental and cultural impacts on the communities in the corridor, increases the quantity of housing stock available for purchase, and can be built in a few years at one percent of the Build Alternative's estimated cost.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-138	California Initiative Delegation from the U.S. Dept. of Transportation	7/24/93	OP	The unacceptable burdens of the Build Alternative are the following: permanent destruction of established communities in South Pasadena, El Sereno, and Pasadena; loss of historic resources; short-term disruption of the corridor causing permanent economic devastation to businesses and the schools; uses MTA funding that could be used for more urgent needs; does not meet any demonstrated regional need.	<p>Comment noted during decision making process. The Build Alternative meets the project's purpose and need. Please refer to the report "A Model Evaluation of the City of South Pasadena's Multi-Mode/Low Build Proposal" for a comparison of the Build, No Build, and Multi-Mode/Low Build proposal. Also, please refer to the Environmental Reevaluation (April 1998).</p> <p>Please refer to the Environmental Reevaluation (April, 1998), Final Section 4(f) Evaluation, the report, "A Model Evaluation of the City of South Pasadena's Multi-Mode/Low Build Proposal," and the ROD for further discussion regarding the ability of the Multi-Mode/Low Build proposal to meet the project purpose..</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-139	California Initiative Delegation from the U.S. Dept. of Transportation	7/24/93	OP	The Build Alternative suffers from institutional impediments such as the following: determined and aroused opposition from Federal and State historic preservation agencies, elected officials, national organizations, and local governments, officials, and communities; environmental documentation that is out of date and in violation of federal and state laws; inability to comply with Section 4(f) of Dept. of Transportation Act; inability of Caltrans to construct the freeway under California law without a "freeway agreement" from South Pasadena.	Comment noted during decision making process.
LB-140	California Initiative Delegation from the U.S. Dept. of Transportation	7/24/93	OP	The Route 710 Committee and the Final Report had several deficiencies such as the following: excluded any alternative except Caltrans' "Meridian Variation" freeway; excluded representation of all affected communities and interests, excluded evidence of broken trust by former FHWA administrator and Caltrans; has been misinterpreted as support for freeway by the entire committee; lacks Caltrans' commitment to the mitigation measures on which the committee did agree.	Comment noted during decision making process. A total of 24 alternatives have been studied since the beginning of this project. Please refer to the FEIR/EIS, the Environmental Reevaluation (April, 1998), and the ROD for a discussion of the issues and commitments. FHWA and Caltrans are committed to the mitigation measures as described in these reports.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-141	City of South Pasadena		OP	The Multi-Mode/Low Build proposal uses concepts created prior to the free-way network system of the 1950s. It is based on the following: existing arterial street should be improved to handle traffic efficiently as possible; truck traffic from the port belongs on the rail system, not the roads; light rail projects and other forms of mass transit are the future for Los Angeles County.	Comment noted during decision making process.
LB-142	City of South Pasadena		OB	The Multi-Mode/Low Build proposal provides several improvements and ideas such as the following: extending the 710 in East Los Angeles Mission Road; creating new paths for the traffic by diverting it along Del Mar toward Raymond and Arroyo Parkway; improving the flow of traffic at the intersections on Huntington Drive and Fremont Avenue and at Fair Oaks in South Pasadena.	Comment noted during decision making process.
LB-143	City of Alhambra, Department of Public Works	10/12/93	NR	Multi-Mode/Low Build proposal critique.	A critique to the Multi-Mode/Low Build proposal is included in Appendix A of the Evaluation.
LB-144-147	None.	None	None	Note: There is a gap in Volume III comment numbering for LB-144 through LB-147.	
LB-148	City of South Pasadena letter to California Transportation Commission (CTC)	7/24/94	OP	The Multi-Mode/Low Build proposal is the most cost-effective solution to the transportation problem and makes the best use of existing resources.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-149	City of South Pasadena letter to Caltrans-District 7	1/25/94	NR	The City of South Pasadena requests a postponement on their draft review dates.	A postponement was granted.
LB-150	City of South Pasadena letter to Caltrans-District 7	1/26/94	GEO	The City of South Pasadena is concerned that the 710 Corridor lies on the Raymond Hill Fault. They are concerned with the safety of the bridges.	As a result of discussions about potential errors and omissions in the seismic analysis, specifically on the Raymond Hill Fault Trace, it was recommended that Caltrans and appropriate consultants conduct a detailed review of their seismic analysis of the area during the final design phase of the project.
LB-151	City of South Pasadena letter to Caltrans	1/18/94	RD	Transmittal of additional exhibits to Caltrans.	Comment noted during decision making process.
LB-152	Congressman James Rogan	1/4/97	OP	Rather than complete this extension, would like to see bipartisan support for reviewing the Multi-Mode/Low Build proposal to the Route 710 project.	Comment noted. Every professional quantitative analysis of every Multi-Mode/Low Build proposal concluded that they are ineffective.
LB-153	Congressman James Rogan	1/9/97	OP	FHWA may wish to have an independent evaluation of their analysis of the Multi-Mode/Low Build proposal.	Comment noted. FHWA stands by the results of their report.
LB-154	Congressmen Matthew Martinez and Esteban Torres	4/28/97	FU	Requests that funding issue of Multi-Mode/Low Build proposal be disregarded at this time so that decision-making process can continue.	Comment considered during decision making process. Please refer to the ROD.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-155	State Assemblyman Bill Hoge	5/10/96	OP	Requests FHWA not approve ROD and endorse mediation as a solution to the current dispute regarding the gap closure.	FHWA does not believe that mediation will be useful or successful due to the diverse interests associated with the project, and does not want to incur further delays in the project.
LB-156	State Assemblyman Bill Hoge	5/10/96	FU	Fund cost of Multi-Modal/Low Build proposal with the sale of all of the State-owned properties in the 710 corridor.	Comment noted; specific legislation would be required.
LB-157	State Assemblyman Bill Hoge	5/10/96	SE	The argument that the 710 freeway extension would create jobs fails to cite that these jobs would not exist until freeway construction begins, while Multi-Mode/Low Build proposal can provide immediate jobs.	The timing of any job is tied to the timing of project funding.
LB-158	State Assemblyman James Rogan	1/4/96	OP	Supports the Low Build/Multi-Mode/Low Build proposal. The 1992 Final EIS is outdated, and its data should not be used as a basis to approve the project.	The Committee report and the Environmental Reevaluation (April, 1998) update the data and provide the basis for a project decision.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-159	City of South Pasadena	1/5/97	OP	Opposes gap closure project and supports the Multi-Mode/Low Build proposal. Concurrs with FHWA in that a third party validation needs to take place to achieve an unbiased, neutral analysis of the 710 freeway and alternatives.	FHWA does not support third party validation, nor performance of an independent review of Multi-Mode/ Low Build proposal. An analysis submitted by Caltrans and critiqued by City of South Pasadena. FHWA has thoroughly analyzed the alternative. FHWA's primary objective is to make a decision on the proposed Route 710 project.
LB-160	National Trust for Historic Preservation	4/30/96	OP	Opposes gap closure project.	Comment noted during decision making process.
LB-161	National Trust for Historic Preservation	4/30/96	C/N 4F	The laws that govern your decision on this project have not been satisfied. These laws, which should be carefully considered in the decision, include: NEPA; Section 4(f); 49 U.S.C. §303; 23 U.S.C. §138; 42 U.S.C. §4332; 49 U.S.C., Part 1500; NHPA; 16 U.S.C. §470f; and 36 CFR, Part 800	The comment does not identify inadequacies in the Final EIR/EIS and is therefore considered the opinion of the commentor. Comment noted during decision making process.
LB-162	National Trust for Historic Preservation	4/30/96	4F CH	Approval of gap closure project would violate Section 4(f). The Multi-Mode/Low Build proposal is a feasible and prudent alternative which would avoid virtually all harm to historic properties and neighborhoods, and would deliver similar transportation benefits as proposed project for less cost.	The Multi-Mode/Low Build proposal does not address the transportation problem and does not meet the project purpose and need. Please refer to the Environmental Reevaluation (April 1998) for a discussion of the issues. See Responses to Comments LB-124 and LB-152.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-163	National Trust for Historic Preservation	4/30/96	4F PN	The reasons offered for rejecting the Multi-Mode/Low Build proposal are not legally sufficient. The alleged use of other 4(f) resources and the "need" for a freeway are not legitimate reasons.	The Multi-Mode/Low Build proposal does not address the transportation problem and does not meet the purpose and need. Please refer to the Environmental Reevaluation (April 1998) for a discussion of the issues. See Responses to Comments LB-124 and LB-152.
LB-164	National Trust for Historic Preservation	4/30/96	4F	The Section 4(f) Evaluation completely omits consideration of indirect or constructive use impacts of the freeway.	These impacts are addressed in the Revised Final Section 4(f) document.
LB-165	National Trust for Historic Preservation	4/30/96	4F	The 4(f) Evaluation fails to address the use of historic properties of State or local significance, as mandated by the statute.	These impacts are addressed in the Revised Final Section 4(f) document.
LB-166	National Trust for Historic Preservation	4/30/96	C/N OP PD	A supplemental EIS is required under NEPA. The 1992 Final EIS is outdated, cursory in its analysis, not responsive to comments, and completely omits any discussion of significant changes such as the Multi-Mode/Low Build proposal, the Short Line Villa Tract Historic District alignment shift, newly identified historic resources, environmental justice issues, and mitigation measures, which were developed after 1992.	See response LB-152, LB-158, LB- 162 and LB-163.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-167	National Trust for Historic Preservation	4/30/96	CH	The FHWA has not completed the process of compliance with the NHPA. Additional consultation with the Advisory Council is required under Section 106 because of changes to proposed project since the time of the CEQ referral	See response to comments LB-152, LB-158, LB-162 and LB-163.
LB-168	National Trust for Historic Preservation	4/30/96	CH	The consideration of adverse effects is not consistent with the requirements of Section 106. The proposed mitigation measures are potentially harmful to historic properties.	See response LB-152, LB-158, LB-162 and LB-163.
LB-169	National Trust for Historic Preservation	4/30/96	OP	Urges FHWA to deny federal approval of gap closure project.	Comment noted.
LB-170	National Trust for Historic Preservation	7/17/97	4F PN	References Dept. of Interior's 4/17/97 letter to FHWA stating that it does not address Section 4(f) issues under 23 CFR §771.135(I), such as whether Multi-Mode/Low Build proposal is feasible and prudent.	The Multi-Mode/Low Build proposal is not a feasible and prudent option. See response to comment LB-152.
LB-171	Antonio Rossmann	11/7/96	AL	Expressed support for the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-172	City of South Pasadena	1/17/95	OP	Expressed support for the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-173	City of South Pasadena	1/17/95	AL	Expressed desire to discuss Multi-Mode/Low Build proposal with FHWA.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-174	The 710 Opposition Coalition	9/1/95	OP	Expressed support for the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-175	City of Los Angeles	9/8/95	OP	Expressed support for the gap closure project and the evaluation process conducted by Caltrans and FHWA for the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-176	City of Pasadena	9/13/96	OP	Expressed support for the gap closure project and the mitigation process conducted by FHWA and Caltrans.	Comment noted during decision making process.
LB-177	City of South Pasadena	9/15/96	AL	Expressed concern regarding the City's participation in the review of the Multi-Mode/Low Build Evaluation.	Comment noted during decision making process.
LB-178	City of Alhambra	9/19/96	OP	Expressed support for the gap closure project and opposition to the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-179	Richard Alatorre, L.A. City Councilman, Ann Marie Villicana, Pasadena Council member and Talmage Burke, Alhambra Mayor	12/14/95	OP	Expressed support for the gap closure project and opposition to the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-180	City of South Pasadena	1/19/96	AL	Expressed concern regarding the City's participation in the review of the Multi-Mode/Low Build Evaluation.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-181	City of South Pasadena	5/27/97	RD	Provided copies of 1) the Purpose and Need Assessment of the 710 Corridor Multi-Mode/Low Build proposal, and 2) Critique of the Model Reevaluation, both prepared for the City. Reiterated community support for the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-182	City of South Pasadena	6/5/97	RD	Provided copies of 1) the Purpose and Need Assessment of the 710 Corridor Multi-Mode/Low Build proposal, and 2) Critique of the Model Reevaluation, both prepared for the City. Requested third party assessment of the Multi-Mode/Low Build proposal as part of the decision making process.	Comment noted during decision making process.
LB-183	City of Alhambra	10/12/93	ALT	Concludes that the entire premise of the report prepared on the Multi-Mode/Low Build proposal, that minimal improvements to existing streets will actually provide greater traffic capacity than an eight lane freeway, is based on "voodoo" traffic management concepts that simply do not hold water.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-184	City of Los Angeles	10/25/93	OP	<p>Concurs with Caltrans that freeways, not low build projects, are needed to adequately achieve such transportation goals as the reduction of local street congestion, accident rates, energy consumption, and air pollutants.</p> <p>On March 22, 1989, the Los Angeles City Council adopted a motion reaffirming its long-standing strong support and commitment for completion of the Route 710 Freeway/Transitway project; and the Los Angeles Department of Transportation supports the Route 710 gap closure project as a vital link in the regional transportation system.</p>	Comment noted during decision making process.
LB-185	City of Long Beach	12/7/93	OP	<p>Concludes that the Multi-Mode/Low Build proposal fails to provide a satisfactory multi-modal solution to the current and future traveling needs within the Los Angeles Region, as well as within the San Gabriel Valley.</p>	Comment noted during decision making process.
LB-186	City of Long Beach	12/27/93	OP	<p>Transmits report on public works staff analysis of the low build approach. States City of Long Beach's support of completing the 710 Freeway.</p>	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-187	City of South Pasadena	1/10/94	CIR	<p>In the Executive Summary, the Multi-Mode/Low Build Evaluation Report asserts that the arterial street improvements have been incorporated into the 30-year plan. Please provide the page number or some other 30-year plan documentation to the type of arterial improvements you are referring to.</p> <p>It is not clear what arterial facilities will be implemented irrespective of Build or No Build alternatives or the Multi-Mode/Low Build proposal.</p>	The analysis referred to throughout this letter has been superseded by Caltrans' April, 1996, Evaluation of the Multi-Mode/Low Build proposal (see Response to Comment LB-188).
LB-188	City of South Pasadena	1/10/94	FU	<p>The MTA is revisiting the 30-year plan due to long-term funding shortfalls. Therefore, report should indicate there are funding difficulties for the Route 710 Freeway and the Blue Line. The Multi-Mode/Low Build can be self-funded.</p>	<p>The FHWA's approval of the ROD for the Route 710 Gap Closure project is subject to several conditions. One of these conditions is that Caltrans develop a financial plan for the project. Bear in mind that the financing of this project is a long-term proposition, with most expenditures occurring during the construction phase of the project. The project has been endorsed by the MTA Board and is a part of SCAG's Regional Mobility Element. Caltrans/FHWA takes issue with the assertion that the Multi-Mode/Low Build proposal can be self-funded. This is misleading. The centerpiece of the Multi-Mode/Low Build proposal is the Blue Line extension to Pasadena, and the Blue Line extension is certainly not self-funded.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-189	City of South Pasadena	1/10/94	CIR TR	The report does not cite the source of studies indicating minimizing the modal shift away from automobiles. The report should provide more information on MTA's light rail program and the surge in interest of ridership on Metrolink due to freeway failure during Northridge earthquake (1/17/94). Blue Line ridership projections should be confirmed. The LARTS model was not adjusted to reflect the new ridership levels or demonstrate capacity of Blue Line. LARTS model does not fairly compare capacity of Blue Line and capacity of Route 710 Freeway.	Caltrans used the same mode-choice model that is used by SCAG. The Blue Line ridership is given for all three model runs in the April, 1996, Caltrans report.
LB-190	City of South Pasadena	1/10/94	FU	MTA does not foresee funding being available for the Route 710 Freeway extension.	Please refer to Response to Comment LB-188.
LB-191	City of South Pasadena	1/10/94	PD	Report should indicate that Multi-Mode/Low Build incorporates many of the same features as the Route 710 Freeway.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-192	City of South Pasadena	1/10/94	OP	Report inaccurately claims that model assumptions were shared with and verified by City of South Pasadena. However, in meetings with Caltrans, the modelers refuse to make key adjustments to model for comparison of the Multi-Mode/Low Build, such as (1) trip generation changes compared to the Meridian Variation and No Build alternatives; (2) trip distribution changes; (3) Blue Line not analyzed based on capacity and transit service enhancements were not added; (4) ramp at Hellman Avenue and Route 710 Freeway to serve California State University at Los Angeles was not included in model; (5) segment in Pasadena not adjusted to reflect ramp system proposed; (6) no adjustment were made to travel speeds; and (7) model did not adjust for traffic calming strategies.	<p>In the April, 1996, Report, all changes requested by South Pasadena were made to both the highway and transit systems. They were agreed to at an October 18, 1995, meeting at SCAG, and reviewed and agreed to by South Pasadena consultants in December, 1995, and January, 1996. (1) and (2) the referenced April, 1996, report. Separate trip generation, distribution, mode-choice highway assignments, transit assignments, and air quality runs were made for the No Build Alternative, Build Alternative, and Multi-Mode/Low Build proposal. (3) If demand is less than capacity, then capacity is not an issue. Transit enhancements were added as part of the Multi-Mode/Low Build proposal. They would cost the taxpayer \$16.25 million per year. (4) As shown in the referenced April, 1996, report, the Hellman Avenue ramps were included in the Multi-Mode/Low Build proposal. (5) The referenced April, 1996, report includes ramp system adjustment in Pasadena. (6) The travel speeds from VROAD were adjusted by Direct Travel Impact Model (DTIM) II procedures.</p> <p>(7) The referenced April, 1996, report addresses traffic calming. Calming was added as part of the Multi-Mode/Low Build proposal.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-193	City of South Pasadena	1/10/94	OP	The Evaluation Report should include the No Build Alternative as an option, as well as the cost benefits of each of the three alternatives.	The April, 1996, report includes cost benefit analysis for both Build Alternative and Multi-Mode/Low Build proposal compared to No Build Alternative.
LB-194	City of South Pasadena	1/10/94	OP	The Evaluation Report should include the increases in traffic from the No Build Alternative as compared to the Build Alternative and Multi-Mode/Low Build proposal. The report dwells on the arterials with significant increases, such as Orange Grove Avenue and Fremont. The Multi-Mode/Low Build calls for traffic decreases on Orange Grove Avenue.	Three screenline analyses were included covering north-south arterials in the Route 710 corridor.
LB-195	City of South Pasadena	1/10/94	OP	Include the recent findings of the Echelon report regarding level of service at various intersections.	The referenced Echelon report was superseded by the April, 1996, report.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-196	City of South Pasadena	1/10/94	OP	<p>The following information comparing build and Multi-Mode/Low Build proposal should be included in the matrix found on Page VI of the Evaluation Report:</p> <ul style="list-style-type: none"> • Reduce local congestion • Reduce circuitous measured • Complete HOV network • Promote carpools/vanpools • Promote transit • Reduce single drive car trips • Reduce accident/fatality rates • Reduce energy consumption • Reduce air pollutants • Truck access • Discourages transit use • Limits public safety access • Traffic noise impacts on schools • Calms traffic in residential areas 	Please refer to Response to Comment LB-195. The April, 1996, report provides a matrix of answers to these questions under Conclusions.
LB-197	City of South Pasadena	1/10/94	OP	<p>Statements regarding Build Alternative as better transportation alternatives, proposed Multi-Mode/Low Build improvements having limited local benefit, and Multi-Mode/Low Build proposal not meeting regional mobility need are subjective and unsubstantiated.</p>	The April, 1996, report shows negative benefits for the Multi-Mode/Low Build proposal; see the cost benefit analysis.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-198	City of South Pasadena	1/10/94	OP	Statements claiming that Fair Oaks to Fremont Avenue corridor is the only facility available for north-south access in West San Gabriel Valley and Huntington Drive is a bottleneck are incorrect.	Refer to April, 1996, report. See results of Screenline #2 for analysis of north-south arterials. It shows the Build Alternative removes 32,000 vehicles from Raymond, Fremont, Fair Oaks, and Los Robles Avenues. The Multi-Mode/Low Build proposal adds 2,000 vehicles a day over the No Build Alternative.
LB-199	City of South Pasadena	1/10/94	OP	Evaluation Report states that traffic must traverse mostly residential neighborhoods. However, Fair Oaks Avenue is primarily commercial from Pasadena to Huntington Drive. Fremont is commercial and industrial in large portions of Alhambra with more commercial areas along avenue planned.	This evaluation was superseded by the April, 1996, report.
LB-200	City of South Pasadena	1/10/94	OP	Caltrans has never completed an origin and destination study of cars at the Valley Boulevard ramp and at Pasadena ramps at the freeway's current termini.	Comment noted during decision making process. Please refer to the report, "A Model Evaluation of the City of South Pasadena's Multi-Mode/Low Build Proposal" (April, 1996) for a discussion of the issues in question.
LB-201	City of South Pasadena	1/10/94	OP	Evaluation Report provides no data or material to define "tremendous congestion."	This evaluation was superseded by the April, 1996, report.
LB-202	City of South Pasadena	1/10/94	OP	It should be clarified that the 24 alternatives identified in the evaluation report are basically variations on three basic alignments.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-203	City of South Pasadena	1/10/94	OP CIR	Recent Echelon work indicates that the freeway will not significantly improve the local street traffic. Therefore, where in the DEIR or other information is the statement, "traffic would be confined to a regional facility, thereby protecting neighboring communities from outside traffic," found?	The April, 1996, report shows screenline improvements for the Build Alternative. The adverse effects of through traffic on Alhambra and El Sereno local streets covered by the Multi-Mode/Low Build proposal are documented on page 30 of the April, 1996, report.
LB-204	City of South Pasadena	1/10/94	OP	Evaluation Report should state that FHWA is prohibited from approving ROD by CEQ. The CEQ requires controversies on Multi-Mode/Low Build proposal and impacts on historic resources to be resolved. The purpose of Caltrans/DKS should be to fairly and objectively evaluate a viable alternative.	Evaluation superseded by April, 1996, report.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-205	City of South Pasadena	1/10/94	OP	The Evaluation Report indicates that “most of the recommendations” of the Route 710 Mitigation Advisory Committee were adopted. Which recommendations did Caltrans not recommend to the CTC and FHWA?	<p>The Mitigation and Enhancement Advisory Committee’s Final Report, June, 1993, made numerous recommendations to reduce the Route 710 Freeway/Transitway project’s “Footprint” and lessen its impacts on the environmentally sensitive surrounding communities. The vast majority of these recommended measures have been incorporated into the project. Those recommendations that were not incorporated into the project, and reasons for not incorporating them, are as follows:</p> <ol style="list-style-type: none"> 1. Cut-and-cover tunnel in the vicinity of Orange Grove Park in the City of South Pasadena. It was not incorporated into the project because it was determined to not be “cost-effective.” It would not serve for historic properties relocation or serve to retain local circulation patterns. Noise would be mitigated at the adjacent park by noise barriers, and the facility is fully depressed at this location.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-205 (cont.)	City of South Pasadena (cont.)				<p>2. Provide affected school districts with up to \$4,700,000 over a seven year period for lost ADA funds from the State, to offset enrollment drops. This recommendation was not incorporated into the project because of lack of legislative direction. However, it was acknowledged that existing statutes governing severance aid are obsolete. Caltrans has committed to working with school districts to have the appropriate sections of the Education Code revised.</p> <p>3. The hiring of consultants to serve as advocates for Spanish speaking and senior citizen displacees to make their relocation and adjustment easier. The provision of relocation advocates has been incorporated into the project, except that Caltrans feels that experienced relocation personnel on staff can do a better job.</p>
LB-206	City of South Pasadena	1/10/94	FU	The 30-year plan is in chaos. MTA will be revising the plan in the upcoming months due to significant funding shortfalls. Caltrans is required to provide a financing plan for their portion of the Route 710 Freeway prior to FHWA approval.	Please refer to Response to Comment LB-188.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-207	City of South Pasadena	1/10/94	OP	The Evaluation Report states that the Multi-Mode/Low Build proposal identified 16 issues. This statement is false. The Route 710 DEIR identified 16 issues. The Multi-Mode/Low Build comparison was to evaluate the two alternatives using the Caltrans identified issues.	Comment noted. However, the point of the DKS evaluation was that the completion of the Route 710 Extension would better address the identified issues.
LB-208	City of South Pasadena	1/10/94	OP	The Evaluation Report contains editorial statements that the CTC should not have to deal with. The report also states that "other important issues which were not included in the action plan are also addressed." Which ones are these?	This evaluation was superseded by the April, 1996, report.
LB-209	City of South Pasadena	1/10/94	OP	It should be noted that the City of South Pasadena is not the only group proposing the Multi-Mode/Low Build proposal.	Comment noted during decision making process.
LB-210	City of South Pasadena	1/10/94	OP	It should be noted that Caltrans refused to adjust the model to accurately reflect certain modeling assumptions.	The April, 1996, report includes all of the network changes recommended in the Multi-Mode/Low Build Evaluation Report agreed to on October 18, 1995, and verified by South Pasadena's consultant and Kimley Horn in December, 1995, to January, 1996.
LB-211	City of South Pasadena	1/10/94	CIR TR	Clarify information regarding Blue Line and transit corridor compared with alternatives.	Blue Line included in referenced April, 1996, report. Please refer to Response to Comment LB-210.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-212	City of South Pasadena	1/10/94	OP	SCAG survey concluded that there needs to be less construction of new freeways. Caltrans indicated that a limited origin and destination study was performed for Route 710 in 1982 with incomplete data. The report did not examine a 24-hour period, but concentrated on a morning commute.	Caltrans used a.m. peak (2 hours), p.m. peak (3 hours), and off peak (19 hours) incremental assignments in the referenced April, 1996, report.
LB-213	City of South Pasadena	1/10/94	OP	Conservative estimates indicate that an additional 19,000 daily trips will be added due to the extension of the Pasadena Blue Line into the San Gabriel Valley.	The Long Beach Freeway currently carries an average of 200,000 vehicles a day between Interstate 405 and State Route 60, a distance of 16 miles with 11 to 14 percent trucks or 400,000 person trips.
LB-214	City of South Pasadena	1/10/94	OP	What is meant by the term “drastic measure” in the statement, “In order to achieve any significant modal shift from automobile to public transportation, <i>drastic measures</i> must be incorporated.”	The term drastic in the statement refers to extreme measures that would have to take place, for example a sudden rise in gasoline prices that would make driving an unacceptable alternative for most drivers.
LB-215	City of South Pasadena	1/10/94	OP	The DKS analysis did not factor into the model any of the bus transportation measures which the Multi-Mode/Low Build proposes. The statement that bus service is acceptable in the West San Gabriel Valley is false.	Caltrans used MTA’s transit network for modeling this whole region in the referenced April, 1996, report.
LB-216	City of South Pasadena	1/10/94	CIR	The origin and destination study needs to be updated.	Models are updated on a periodic basis as new data such as origin and destination surveys are made. Currently, SCAG is implementing its 1991 survey data in ongoing model updates.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-217	City of South Pasadena	1/10/94	CIR	Please provide the source and page number for the statement that “approximately 50,000 trips a day enter the Los Angeles central business district that would use Route 710 if the gap were closed.”	This analysis superseded by April, 1996, report; see Figure 4 and page 23, Impact Upon the I-5 Corridor.
LB-218	City of South Pasadena	1/10/94	OP	The DKS report falsely states that the Multi-Mode/Low Build did not consider the regional perspective. Its conclusion that the limited freeway extension of the Multi-Mode/Low Build will have little or no effect on the extremely congested condition at the intersections of Valley Blvd. and Fremont Ave. as well as at Mission Road and Fremont Avenue is not supported with data.	Please refer to Responses to Comments LB-194 and LB-198.
LB-219	City of South Pasadena	1/10/94	CIR	The limited extension of the freeway to Mission Road will terminate in the industrial area in Alhambra/ City of Los Angeles. The Evaluation Report mislabelled the areas as residential.	See Figure 10 and page 36, Effects on Local Streets, in the referenced April, 1996, report.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-220	City of South Pasadena	1/10/94	HB	The Multi-Mode/Low Build proposal proposes no displacements of homes.	Comment noted. However, it should be pointed out that for Phase 2 of the South Pasadena portion, the Multi-Mode/Low Build proposal calls for the reconstruction of the intersection of Fair Oaks Avenue with Huntington Drive to provide for higher roadway capacity. There are several ways to accomplish this, but to obtain optimal efficiency it would be necessary to “smooth out” the entire Fremont Avenue/Huntington Drive/Fair Oaks Avenue transition, which would require acquisitions of commercial and residential uses to obtain sufficient right-of-way.
LB-221	City of South Pasadena	1/10/94	CIR	The ramps on Hellman Avenue could be redesigned to service California State University at Los Angeles traffic only, rather than diverting campus traffic to Valley Blvd to access the facility.	During the Advisory Committee process, Alhambra officials did express concern regarding the potential for Hellman Avenue becoming a thoroughfare for California State University at Los Angeles traffic, through Alhambra residential neighborhoods. However, Caltrans does not envision this scenario taking place because Route 710 traffic to/from California State University at Los Angeles would have no reason to access Alhambra neighborhoods. Of course, Alhambra residents attending California State University at Los Angeles could access the University via Hellman Avenue, but this is an existing traffic pattern that would simply continue following completion of the gap closure.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-222	City of South Pasadena	1/10/94	CIR	The DKS report downplays the interchange spacing by indicating that four interchanges are within 1.1 miles. The Caltrans proposed freeway shows four interchanges in these same locations and two frontage roads. Text should be corrected as such.	<p>The DKS evaluation has been superseded by the April, 1996, model evaluation. However, it should be noted that, in the case of the Final EIS, there is a split-diamond interchange at Hellman/ Valley/ Mission, with frontage roads to facilitate local circulation. This is very different from the arrangement in the Multi-Mode/Low Build proposal, which is for the purpose of diverting end of freeway traffic to Mission Road. This is not a split-diamond arrangement as in the Build Alternative presented in the Final EIS. The split-diamond arrangement operates in conjunction with a through freeway. The Multi-Mode/Low Build proposal is not for the purpose of accommodating through traffic, but diverting it onto arterial roads (and there are no frontage roads).</p> <p>At the October 18, 1995 modeling meeting for the Multi-Mode/Low Build proposal it was agreed to provide a one-way frontage road on the west side of Route 710 between Valley Boulevard and Hellman Avenue by</p>
LB-222 (cont.)	City of South Pasadena (cont.)				California State University at Los Angeles (please refer to Appendix G of the April, 1996 Model Evaluation.) The resulting ramp arrangement with the Multi-Mode/Low Build proposal is not a split-diamond arrangement as in the Build Alternative.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
					The Build Alternative includes a split-diamond interchange which serves as a local access/egress facility to/from a through Freeway. The Multi-Mode/Low Build arrangement diverts through Freeway traffic onto local arterial roads where it is to "diffuse" through local streets and roads.
LB-223	City of South Pasadena	1/10/94	CIR OP	Caltrans and the City of Alhambra should perform origin and destination studies at places where traffic is circulating within the city. It should be noted that the Multi-Mode/Low Build proposal cannot be responsible for the continued lack of development mitigation in Alhambra.	The City of Alhambra is responsible for its own Circulation Plan.
LB-224	City of South Pasadena	1/10/94	HB OP	The DKS study did not explain the PAIZ strategy in the Multi-Mode/Low Build. There are several areas along Fremont Avenue which need to be studied for impacts on existing residences.	The final version of the DKS evaluation did include a discussion of PAIZ strategy. However, the DKS evaluation has been superseded by the April, 1996, Route 710 Model Evaluation. Please refer to the April, 1996, Model Evaluation for a discussion of PAIZ strategies. There were no plans to displace residences along Fremont Avenue due to restriping.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-225	City of South Pasadena	1/10/94	OP	The DKS study is in error when it says the Multi-Mode/Low Build proposal provided no solution for the transition between Huntington Drive, Fremont and Fair Oaks Avenues. The Multi-Mode/Low Build proposal identified four alternatives to handle this transition; the DKS study did not model these changes.	This evaluation was superseded by April, 1996, report.
LB-226	City of South Pasadena	1/10/94	OP	The DKS report states "it seems inappropriate for this transition to carry freeway level traffic volumes." The Multi-Mode/Low Build proposal does not design Fremont Ave. to carry freeway volumes of traffic.	Please refer to Responses to Comments LB-194, LB-198, and LB-203.
LB-227	City of South Pasadena	1/10/94	OP	Please remove editorialization, such as "Once again,...the schematic was revised..." on Page 14 of DKS report.	Comment noted. The DKS evaluation was revised since the date of this comment.
LB-228	City of South Pasadena	1/10/94	CIR OP	The DKS report should also indicate that several Caltrans studies show that the Route 710 Freeway extension will severely impact I-210, especially at peak commute times. Also, the model does not make adjustments for the ramp system as envisioned by the Multi-Mode/Low Build at the northern terminus.	See Table 6 in the referenced April, 1996, report.
LB-229	City of South Pasadena	1/10/94	CIR OP	It should be noted that any TSM or SMART Corridor systems planned for the freeway can be incorporated into the Multi-Mode/Low Build proposal.	Refer to April, 1996, report. ITS improvements of added seven percent capacity were added to arterial roads as agreed to on October 18, 1995.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-230	City of South Pasadena	1/10/94	OP	The DKS report states that currently arterial roads in the San Gabriel Valley are operating "at or near capacity." Please provide a listing of the arterial streets in the San Gabriel Valley with their potential capacity and current operating capacity.	Please refer to Response to Comments LB-194, LB-198, and LB-203.
LB-231	City of South Pasadena	1/10/94	OP	The DKS report states that "various street improvements have been included in MTA's 30-year plan that will reduce traffic congestion." Please provide a listing of these improvements that are in the 30-year plan with a page number, along with their current and projected funding status.	Please refer to Response to Comment LB-187 and LB-188.
LB-232	City of South Pasadena	1/10/94	OP	Please provide data from the State of California on accident rates in El Sereno, Alhambra, San Marino, South Pasadena and Pasadena. Data should be sorted between those vehicles that would have used the freeway and those that would have used local streets.	Accident data are provided in the April, 1996, report.
LB-233	City of South Pasadena	1/10/94	OP	The DKS report indicates that the 30 year plan does not include an extension to the Pasadena Blue Line. The report should be clear that there is significant interest in the San Gabriel Valley to extending the Blue Line.	The Blue Line extension is included in the April, 1996, report.
LB-234	City of South Pasadena	1/10/94	FU	The DKS report should indicate the amount of funds that have already been spent by Caltrans for purchase of the right-of-way for the freeway.	Costs are provided in the April, 1996, report.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-235	City of South Pasadena	1/10/94	OP	Please provide the miles of proposed freeway that would be wider than 142 feet and the mileage of freeway that would be 142 feet wide.	The entire 6.2 mile length of the Route 710 freeway/transitway would be wider than 142 feet. It is accurate to say that the basic design width of the travelway is 142 feet, but the width from right-of-way line to right-of-line will be about 200 feet, except in interchange areas, where it will be wider.
LB-236	City of South Pasadena	1/10/94	CIR TR OP	The DKS report should state that the freeway works against multi-modal approaches, such as the Pasadena Blue-Line light rail, truck ban issue, and the provision of only one park and ride lot, which limits accessibility to the bus network.	Evaluation superseded by the April, 1996, report.
LB-237	City of South Pasadena	1/10/94	OP	The DKS report states that "elements of the Multi-Mode/Low Build proposal are already programmed or planned in the 30-year plan." Please provide page numbers where these improvements are mentioned.	All Multi-Mode/Low Build improvements were included in the April, 1996, report.
LB-238	City of South Pasadena	1/10/94	OP	Please correct the DKS report to refer to the Echelon study, which indicates there will be no significant improvement in local roadways by the completion of the freeway.	Please refer to April, 1996, report and responses to comments.
LB-239	City of South Pasadena	1/10/94	OP	The LARTS has a major flaw; it is relying on past trends to forecast the future and it cannot adjust for lifestyle and mode changes.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-240	City of Commerce	1/20/94	OP	States that the completion of the 710 Freeway is of regional significance, not a local problem. It is of critical importance to the economic and social vitality of the region. The City is strongly in favor of the completion of the 710 Freeway.	Comment noted during decision making process.
LB-241	City of South Pasadena	6/20/94	TR	Questions Blue Line projections of 290,000 in Multi-Mode/Low Build proposal and the need for a projection of Blue Line ridership with and without the Route 710 Freeway.	The April, 1996, Multi-Mode/Low Build Evaluation analyzed the Blue Line ridership for three conditions: No Build Alternative - 54,060/day; Build Alternative - 48,661/day; Multi-Mode/Low Build proposal - 57,389/day. The Multi-Mode/Low Build proposal added transit service costing \$16.25 million/year.
LB-242	City of South Pasadena	6/20/94	TR	Why has there not been an integrated study of travel demand considering both the freeway and the light rail line?	The modal evaluation of the City of South Pasadena's Multi-Modal/Low Build proposal by Caltrans District 7 (April, 1996) considered both the freeway and light rail line in the Build Alternative and the Multi-Mode/Low Build proposal and the light rail line in the No Build Alternative.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference										
LB-243	City of South Pasadena	6/20/94	TR	In comparing performance criteria, Caltrans stated that the freeway “outperforms” the Multi-Mode/Low Build proposal in 10 of the 11 performance categories. The word “outperforms” implies a false degree of superiority when Caltrans own facts show that the Multi-Mode/Low Build proposal performs to within 5 percent of the freeway for all but two categories.	When dealing with very large numbers, a small percentage can be significant. The No Build actually outperforms the Multi-Mode/Low Build proposal, that is, it is better to do nothing. The Multi-Mode/Low Build proposal lowers transit ridership also, in spite of the Blue Line increase.										
LB-244	City of South Pasadena	6/20/94	TR	Congestion on arterial streets that occurs as a result of the Multi-Mode/Low Build proposal could be further reduced by additional arterial improvements. These minor additional improvements are a more cost-effective option than the proposed freeway.	<p>The April, 1996, Multi-Mode/Low Build Evaluation analyzes arterial streets at three locations. One typical screenline is south of California Avenue, and extends from Orange Grove on the west to Los Robles on the east. The projected number of vehicle trips (in thousands) for this screenline is shown below:</p> <table style="margin-left: auto; margin-right: auto;"> <tr> <td></td> <td style="text-align: right;">(000)</td> </tr> <tr> <td>1994</td> <td style="text-align: right;">152/day</td> </tr> <tr> <td>2015 No Build</td> <td style="text-align: right;">198/day</td> </tr> <tr> <td>2015 Build</td> <td style="text-align: right;">143/day</td> </tr> <tr> <td>2015 Low Build</td> <td style="text-align: right;">200/day</td> </tr> </table> <p>This is one of a number of indications that the Multi-Mode/Low Build proposal makes traffic worse than doing nothing.</p>		(000)	1994	152/day	2015 No Build	198/day	2015 Build	143/day	2015 Low Build	200/day
	(000)														
1994	152/day														
2015 No Build	198/day														
2015 Build	143/day														
2015 Low Build	200/day														

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-245	City of South Pasadena	6/20/94	FI	Letter claims that the regional benefits are almost the same between the Build Alternative and Multi-Mode/Low Build proposal.	The April, 1996, Multi Mode/Low Build Evaluation using the very latest techniques and very conservative assumptions shows an annual benefit/cost ratio of 1.62. The Multi-Mode/Low Build proposal ratio of a negative 1.25, another indication that doing nothing is better than the Multi-Mode/Low Build proposal.
LB-246	City of South Pasadena	12/5/94	OP	<p>Caltrans continues to misrepresent the facts concerning the performance of the Multi-Mode/Low Build proposal to the Route 710 freeway. Caltrans' own 3/4/94 LARTS report positively supports the Multi-Mode/Low Build proposal. The Multi-Mode/Low Build proposal is a cost-effective investment, while the freeway is not.</p> <p>An MIS study will show this to be true. The FEIS/FEIR certified by Caltrans and FHWA in 1992 failed to include any comparison of the freeway to the Multi-Mode/Low Build proposal.</p>	<p>Caltrans prepared the "State Route 710 - A Model Evaluation of the City of South Pasadena's Multi-Mode/Low Build Proposal" in April, 1996. The evaluation concluded that the Multi-Mode/Low Build proposal would result in more congested nearby freeways and local arterial roads, leading to a situation that would be worse than doing nothing at all.</p> <p>There has been no misunderstanding of the Multi-Mode/Low Build proposal on the part of Caltrans. On August 27, 1990, Caltrans officials met with the Mayor, legal counsel, and other representatives of the City of South Pasadena.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-246 (cont.)	City of South Pasadena (cont.)				<p>Caltrans and South Pasadena representatives of the meeting discussed the Multi-Mode/Low Build proposal then favored by the City. Caltrans prepared plans depicting the concepts of the proposal and presented them to all participants. Caltrans asked the South Pasadena representatives if this accurately reflected what they had in mind, and the response was yes.</p> <p>The Multi-Mode/Low Build proposal, referred to by Caltrans as the Raymond/Arroyo Couplet, was analyzed and the results included in the 1992 FEIS/FEIR, as requested by South Pasadena. Then it was alleged that this was not what they had in mind. In September, 1993, the City developed another Multi-Mode/Low Build proposal referred to as the Multi-Mode/Low Build proposal. Please refer to Response to Comment EIS-3-70.</p> <p>Regarding April, 1996, model evaluation and 1/10/95 MIS review committee, on January 10, 1995, the Major Investment Review committee met and determined that the Route 710 Gap Closure project is to be "grandfathered," as provided by Federal Regulations, having been classified as a Category 2 Project. This finding was memorialized in a February 21, 1995, letter to Caltrans from SCAG.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
					On January 10, 1995, the Major Investment Review committee met and determined that the Route 710 Gap Closure project is to be "grandfathered," as provided by Federal Regulations, having been classified as a Category 2 Project. This finding was memorialized in a February 21, 1995, letter to Caltrans from SCAG.
LB-247	City of South Pasadena	12/19/94	OP FU	Requests the preparation of a Category III MIS.	Please refer to Response to Comment LB-246.
LB-248	City of South Pasadena	12/19/94		Offers the assistance of Walter Kulash and Todd Chavers in the preparation of an evaluation of the Multi-Mode/Low Build proposal.	Please refer to Response to Comment LB-246.
LB-249	Jeffrey Kightlinger, Burke, Williams & Sorenson (Counsel for City of Alhambra)	2/1/95	NR	Transmits low build analyses from the cities of Alhambra, Commerce, Long Beach, and Los Angeles.	Comment noted during decision making process.
LB-250	City of South Pasadena	9/13/95	OP	Expresses frustration regarding Caltrans' lack of communication regarding the Multi-Mode/Low Build proposal.	This comment discusses one of many evaluations for the Multi-Mode/Low Build proposal; this one was published December, 1993. Subsequently, Caltrans has published another evaluation of the No Build and Build Alternatives and Multi-Mode/Low Build proposal in April, 1996.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-251	City of South Pasadena	9/13/95	OP	Caltrans has misrepresented the Multi-Mode/Low Build proposal.	The South Pasadena Multi-Mode proposal has been under almost continuous change for at least ten years. It has been difficult for Caltrans to analyze a proposal that undergoes continuous change. We freeze the changes at some point, which means that a few weeks later we no longer have the latest plan. This was finally put to rest at a meeting with South Pasadena, SCAG, FHWA, Caltrans, and other interested parties on October 18, 1995. At that meeting, South Pasadena agreed to the specifics of the Multi-Mode/Low Build proposal which were evaluated in the Multi-Mode/ Low Build Evaluation (April, 1996).
LB-252	City of South Pasadena	9/13/95	AL	The FEIS/FEIR inadequately describes and then reject the proposal to partially complete the Route 710 Freeway by extending the freeway to Huntington Drive.	Please refer to Response to Comment LB-246.
LB-253	City of South Pasadena	9/13/95	FU	Caltrans needs to prepare a detailed financial plan for the freeway, and work with MTA to be compatible with its Long Range Plan.	Please refer to Response to Comment LB-188.
LB-254	City of South Pasadena	9/13/95	OP	The Multi-Mode/Low Build proposal needs to be considered as a viable alternative.	Comment noted during decision making process.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-255	Antonio Rossmann, Attorney for City of South Pasadena	9/20/95	OP	Caltrans FEIS does not include the Multi-Mode/Low Build proposal or any other similar alternative. The EIS does not include the fully-developed Multi-Mode/Low Build proposal that was developed by South Pasadena because it was presented in 1993 (the FEIS was distributed in 1992). The FEIS distorts the Multi-Mode/Low Build concept by forcing traffic through historic Old Pasadena, producing new historic impacts that are unsatisfactory. And, the FEIS modifies the initial Multi-Mode/Low Build proposal to include a Huntington Drive variation.	<p>The FEIS includes a Multi-Mode/Low Build proposal that was developed by the City of South Pasadena and cultural resource preservation advocates. Also, in 1989, the City of South Pasadena submitted to Caltrans a Multi-Mode/Low Build proposal under the heading "Raymond/Arroyo Couplet." The alternative was rejected as it did not meet the project purpose and need.</p> <p>The FEIS analyses 24 alternatives, which Caltrans considers a "reasonable range" of alternatives. The NEPA process does not require that an EIS analyze a full spectrum or infinite number of alternatives.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-255 (cont.)	Antonio Rossmann, Attorney for City of South Pasadena (cont.)			Caltrans FEIS does not include the Multi-Mode/Low Build proposal or any other similar alternative. The EIS does not include the fully-developed Multi-Mode/Low Build proposal that was developed by South Pasadena because it was presented in 1993 (the FEIS was distributed in 1992). The FEIS distorts the Multi-Mode/Low Build concept by forcing traffic through historic Old Pasadena, producing new historic impacts that are unsatisfactory. And, the FEIS modifies the initial Multi-Mode/Low Build proposal to include a Huntington Drive variation.	The FEIS does include a Multi-Mode/Low Build proposal that was developed by the City of South Pasadena and cultural resource preservation advocates. At an August 27, 1990, meeting held at Caltrans District 7, South Pasadena representatives accepted the Huntington Drive variation of the Raymond/Arroyo couplet as acceptable for analysis. After the FEIS was completed, Caltrans, at FHWA's request, modeled No Build and Build Alternatives and a Multi-Mode/Low Build proposal proposed by the City of South Pasadena. On October 18, 1995, SCAG sponsored a meeting to define the "low build," and agree upon input parameters into the model. The result of this meeting was an agreement dated October 30, 1995, among all parties, including the City of South Pasadena, on the network configuration and traffic conditions that would be modeled. This very detailed analysis focused on mobility, travel, air quality, and costs.
LB-255 (cont.)	Antonio Rossmann, Attorney for City of South Pasadena (cont.)				Not only would the Multi-Mode/Low Build proposal not meet the regional transportation needs, the Multi-Mode/Low Build analysis shows that it would not produce improvements to the local traffic circulation and would result in higher air pollutant levels along the corridor.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
					The diversion of traffic into Del Mar Boulevard to Raymond Avenue and Arroyo Parkway was a feature of the Raymond/Arroyo couplet.
				Caltrans FEIS does not include the Multi-Mode/Low Build proposal or any other similar alternative. The EIS does not include the fully-developed Multi-Mode/Low Build proposal that was developed by South Pasadena because it was presented in 1993 (the FEIS was distributed in 1992). The FEIS distorts the Multi-Mode/Low Build concept by forcing traffic through historic Old Pasadena, producing new historic impacts that are unsatisfactory. And, the FEIS modifies the initial Multi-Mode/Low Build proposal to include a Huntington Drive variation.	At an August 27, 1990, meeting held at Caltrans District 7, South Pasadena representatives accepted the Huntington Drive variation of the Raymond/Arroyo couplet as acceptable for analysis. After two distributions of the FEIS, Caltrans modeled a Multi-Mode/Low Build proposal (see previous response) that did not include the Huntington Drive variation. The proposal, like earlier analyzed "low build" proposals, failed to meet the project's purpose and need.
LB-256	Antonio Rossmann, Attorney for City of South Pasadena	9/20/95	OP	Caltrans' FEIS does not give any Multi-Mode/Low Build proposal more than a preliminary evaluation, which are never provided to decision makers.	The FEIS includes a detailed analysis of the Raymond/Arroyo couplet. As stated in previous responses, Caltrans performed a very detailed evaluation of South Pasadena's Multi-Mode/Low Build proposal as presented in September, 1993. The analysis is described in the report "A Model Evaluation of the City of South Pasadena's Multi-Mode/Low Build Proposal" released in April, 1996.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-257	Antonio Rossmann, Attorney for City of South Pasadena	9/20/95	OP	Requests preparation and circulation of supplemental EIS, which should include Multi-Mode/Low Build proposal.	The Environmental Reevaluation (April, 1998) completed by FHWA, pursuant to 23 CFR 771.129(b) concludes that, because the identified changes and the resulting impacts do not result in overall additional adverse impacts, and there are no new circumstances, or new information relevant to the project that would result in significant adverse environmental impacts not identified in the DEIS, or the 1st, 2nd or 3rd Supplemental DEIS, or FEIS, a supplemental environmental document is not necessary.
LB-257 (cont.)	Antonio Rossmann, Attorney for City of South Pasadena	9/20/95			The Multi-Mode/Low Build proposal was not considered a reasonable alternative after undergoing extensive analysis. The Multi-Mode/Low Build Evaluation Report was completed in January, 1994, and distributed to interested parties for review. The final report was completed on February 25, 1994. All comments will be part of the project's ROD.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-257 (cont.)	Antonio Rossmann, Attorney for City of South Pasadena (cont.)	9/20/95	OP	Requests preparation and circulation of supplemental EIS, which should include Multi-Mode/Low Build proposal.	<p>The Council on Environmental Quality (CEQ) requires that all reasonable alternatives must be considered and evaluated. Reasonableness is defined as practical or feasible from the technical and economic standpoint and that satisfies the project's purpose and need. FHWA/Caltrans do not perceive the Multi-Mode/Low Build proposal as a reasonable alternative. The Multi-Mode/Low Build proposal is not a viable alternative, because it does not conform to the Regional Transportation Plan, it does not reduce trips in and around the Los Angeles central business district, it increases arterial street congestion, it promotes circuitous trips, other cities would be impacted by arterial improvements, and it does not actively support HOV network. Therefore, it does not deserve full consideration.</p> <p>The analysis performed by Caltrans, as agreed among all parties, including the City of South Pasadena, describes the network configuration and traffic conditions that would be modeled, including project conditions.</p> <p>The Analysis Report titled "A Model Evaluation of the City of South Pasadena's Multi-Mode/Low Build Proposal" is available from Caltrans.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
			op	Requests preparation and circulation of supplemental EIS, which should include Multi-Mode/Low Build proposal.	Growth inducing impacts are addressed in Chapter VIII in the FEIS. Growth will take place whether the 710 gap closure project is completed or not. The region is projected to grow 20 million by the year 2020 according to SCAG's regional Comprehensive Plan and Guide (RCPG). The 710 gap closure project would accommodate growth by adding capacity and allowing for a more efficient operation of the regional freeway system.
LB-258	City of South Pasadena	10/30/95	OP	Mode Choice Modeling - modeling procedures will help to determine if Multi-Mode/Low Build proposal is a viable and cost effective alternative to the freeway.	Caltrans uses the same Mode Choice Model that is used by SCAG. This included a recycling of the assignment output speeds.
LB-259	City of South Pasadena	10/30/95	OP	Highway Network modeling: seven percent increase in capacity of arterial streets; concern about the first iteration of the assignment process.	The peak periods had more than ten iterations, so undue concern about the first iteration is misplaced. The capacity changes due to its assumptions of future networks is under periodic review at SCAG with input from Caltrans. We will follow SCAG's lead in making such adjustments.
LB-260	City of South Pasadena	10/30/95	RD	Requests an itemized list of Regional Mobility Element improvements that will be used to establish model base, as well as information on the cost of these items. Will local capital improvements be included in base?	Please refer to Response to Comment LB-190.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-261	City of South Pasadena	10/30/95	RD	Caltrans' invitation for South Pasadena's modelers to review their work.	Kimley-Horne was given a copy of the Transit Network and the changes to be made for the Multi-Mode/Low Build proposal. Kimley-Horn spent the last week of November, 1995, and the month of December reviewing the proposed changes, approving them in early January. They reviewed the changes to the Highway Network in our offices on December 13, 1995, and approved the changes as agreed to on October 18, 1995.
LB-262	City of Baldwin Park	12/19/95	OP	The Multi-Mode/Low Build proposal is seriously flawed, unworkable, and based on theoretical rather than practical assumptions. Therefore, request that Dept. of Interior rescind letter to FHWA asking for new environmental review and ask that Dept of Interior wait for FHWA to complete Section 4(f) process.	Comment noted during decision making process.
LB-263	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	3/21/96	CIR	In the Model Reevaluation, the Multi Mode/Low Build proposal does not stand in any sort of reasonable or credible relationship to the Build and No Build Alternatives that were also modeled.	It is not exactly clear as to what is meant by the contention that the Multi-Mode/Low Build proposal "does not stand in any sort of reasonable or credible relationship" with the Build and No Build Alternatives. All three were modeled and subjected to the same level of vigorous detailed analysis, and the result was presented in a clear fashion. It may be that the memo's author is more concerned about the conclusions reached. However, we stand by the outcome of the analyses and the conclusions reached in the report.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-264	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	3/21/96	CIR	Road capacity: both the Build Alternative and the Multi-Mode/Low Build proposal have significantly more capacity relative to the No Build Alternative. However, in the Multi-Mode/Low Build model, results show more vehicle miles traveled (VMT) and slower speeds. This causes serious questions about the modeling results.	This memo states that the Multi-Mode/Low Build proposal adds significant roadway capacity. Actually, on the south end some capacity has been added by completing the Build Alternative to Mission Road, a distance of about one-quarter mile. The extension gets freeway traffic over the railroad and allows Mission Road to share the burden of getting traffic to Fremont Avenue. It also includes a half interchange at Hellman Avenue, which gives better access to California State University at Los Angeles.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-265	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	3/21/96	CIR	Road performance improvements: the Build Alternative and the Multi-Mode/Low Build proposal add significantly to road performance. However, the model results show more VMT and slower speeds. This poses serious question about the modeling results.	<p>However, on the north end the Multi-Mode/Low Build proposal significantly reduces capacity. It eliminates the existing one mile stub of Route 710 and possibly even more important, puts traffic calming on primary arterial roads (many used by buses). This increases congestion and slows speeds. The combination of removing a piece of the existing route 710 and traffic calming have actually reduced the net capacity of the Multi-Mode/Low Build proposal when compared to the No Build Alternative. Nothing could more clearly illustrate the lack of analysis that went into the Multi-Mode/Low Build proposal. Traffic calming is used throughout the world to keep traffic off of local streets and on arterial roads. However, South Pasadena's Multi-Mode/Low Build Evaluation Report (Figure 1, Northern Low Build Measures Phase 1; Figure 2, Northern Low Build Measures Final Plan; and Figure 3, So. Pasadena's Low Build Measures) clearly shows the streets to be calmed. The model representation of the calming of these streets was approved at a meeting with So. Pasadena's consultant, Kimley Horne, on December 13, 1995.</p> <p>The bottom line is that the combination of highway plans in the Multi-Mode/Low Build proposal reduced the net capacity of the highway system.</p>

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-266	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	3/21/96	CIR	Impacts on transit show the proper relationship between the Build and the No Build Alternative, i.e., the No Build has higher transit ridership but the Multi-Mode/Low Build proposal shows less transit than the No Build Alternative. This is even after transit service was added as part of the Multi-Mode/Low Build proposal. A survey of 20 recent major investment studies involving highways and transit did not disclose a single instance of this “inverse” transit relationship.	The increased transit feeders to the Blue Line did increase the Blue Line ridership by 3,300 per day. Many of the arterial roads “calmed” in the City of Pasadena had major bus service; when calmed, the bus speeds dropped. The net effect of the congestion caused by calming and elimination of an existing piece of Route 710 was to lower the total transit ridership. As to the comment about the “inverse” relationship not showing up in the 20 other studies, it seems likely that the Build Alternative in the other studies did not make traffic worse than the No Build Alternative.
LB-267	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	3/21/96	CIR	Model anomalies may be due to misinterpretation of the Multi-Mode/Low Build proposal.	Please refer to Response to Comment LB-246.
LB-268	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	3/21/96	CIR	Caltrans' modeling of the Multi-Mode/Low Build proposal was not a good faith effort, or it is not possible to model the Multi-Mode/Low Build proposal.	Please refer to Response to Comment LB-246. Documentation is also provided in Appendix G of the Caltrans Report.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-269	Glatting, Jackson, Kercher, Anglin, Lopez, Rinehart	3/21/96	CIR	Proposes that an approach of “incremental adjustment” of Build and No Build Alternatives may be a productive approach to Multi-Mode/Low Build proposal analysis. It is suggested to start with the No Build, and then incrementally compute the impact of the Multi-Mode/Low Build proposal's features such as augmented transit service, traffic calming, street improvements, etc.	Transportation system modeling by “incremental adjustments” is unknown and, hence, is not an acceptable or available methodology.
LB-270	William J. York, Jr.	1/11/96	OP	The Multi-Mode/Low Build proposal will implement economical and subtle improvements to accommodate modest traffic increases that can be expected to occur over time.	It is a myth that freeways of themselves “induce” additional demand. The demand is already using surface streets and out of the way routes. Freeways serve to add capacity to the regional freeway system, allowing it to operate more efficiently, and relieving local arterial roads of through traffic.
LB-271	C. Thomas Williams	2/12/96	OP	The new Multi-Mode/Low Build proposal is far less suitable for residents of El Sereno. Supports the old Huntington Low Build or completion of the Route 710 Freeway gap closure.	Comments noted. Please refer to April, 1996, Model Evaluation (p.5) regarding effects of the Multi-Mode/Low Build proposal on El Sereno. Regarding excess properties, Caltrans would be constrained to dispose of surplus properties at or below market value.
LB-272	C. Thomas Williams	2/26/96	OP	Supports the old Huntington Low Build proposal or completion of the Route 710 Freeway gap closure.	Please refer to Response to Comment LB-271.

Comment No.	Commentor	Comment Date	Subject Code	Issue	Response/Document Reference
LB-273	C. Thomas Williams	2/26/96	OP	The Huntington Low Build proposal reduces adverse traffic circulation impacts of the new Multi-Mode/Low Build proposal and improves services of the completed portion of Route 710 Freeway. This proposal will also allow for further extension at a future date if needed.	Please refer to Response to Comment LB-271.

ATTACHMENT

**COMMENTS RECEIVED ON THE MULTI-MODE/LOW BUILD
PROPOSALS**