

ATTACHMENT A

to

City of Alhambra Comment Letter 8-5-15

Evaluation of Transportation Elements of the SR 710 North Study Draft Environmental Impact Report. Environmental Impact Statement prepared by Gibson Transportation Consulting, Inc.


[home](#) [about](#) [staff](#) [services](#) [projects](#) [contact](#)

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president



Pat Gibson has over 45 years of experience in preparing traffic and parking analyses for both public and private sector projects. He has directed the transportation sections for Environmental Impact Reports and Environmental Impact Statements for numerous large development projects, including:

Aquarium of the Pacific
 Arizona Cardinals NFL Stadium
 Arrowhead Pond of Anaheim
 Bakersfield Commons
 Century City Center
 Disneyland Resort
 Dodger Stadium
 Downtown Disney, Disney World
 Dubailand Theme Parks, United Arab Emirates
 Hollywood & Highland
 Honda Center
 The Huntington Library Education & Visitors Center
 LAX Northside Plan Update
 LEGOLAND
 Long Beach Convention Center
 Los Angeles Convention Center
 NBC/Universal Studios
 Paramount Pictures Studios
 PETCO Park
 Phoenix Coyotes NHL Arena
 Playa Vista
 The Queen Mary
 Rose Bowl
 STAPLES Center
 The Village at Westfield Topanga
 University of Southern California
 Wilshire Grand

Pat has directed over 50 downtown parking studies and has conducted hundreds of parking needs, feasibility, and functional design studies, as well as shared parking and parking financial analyses, for developments throughout Southern California and the United States. He has prepared traffic and parking studies for stadiums and event centers, new and expanded regional shopping centers, and retail/entertainment centers throughout the United States. He spearheaded traffic, parking, access/circulation, and safety studies for over 50 schools and universities, and has spoken internationally on the topic.

Pat co-authored both editions of *Shared Parking for the Urban Land Institute* as well as *Parking Requirements for Shopping Centers, 2nd Edition* for the Urban Land Institute and International Council of Shopping Centers.

He teaches the transportation planning and traffic engineering courses at the University of California, Los Angeles and East Los Angeles College.

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Committee Member on Design of Regional Shopping Centers

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MEMORANDUM

TO: Leland Dolley, Leland C. Dolley A Law Corporation
FROM: Patrick A. Gibson, P.E., PTOE, and Eugene Tang, AICP
DATE: July 9, 2015
RE: Evaluation of Transportation Elements of the
SR 710 North Study Draft Environmental Impact Report/
Environmental Impact Statement

Ref: 1370

Gibson Transportation Consulting (GTC), on behalf of the City of Alhambra, has prepared an evaluation of the transportation analyses related to the State Route (SR) 710 North Study. GTC reviewed the documents identified below and compared the impacts of the alternatives.

The following documents and presentations were utilized in this evaluation:

- *SR 710 North Study, Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings* (California Department of Transportation [Caltrans] and Los Angeles County Metropolitan Transportation Authority [Metro], March 2015) (the DEIR)
- *SR 710 North Study Transportation Technical Report* (Caltrans and Metro, November 2014) (the Transportation Report)
- *SR 710 North Study Air Quality Assessment Report* (Caltrans and Metro, January 2015) (the AQ Report)
- 710 North Public Hearings (Public Hearings)
 - May 6, 2015, La Cañada High School Auditorium, La Cañada
 - May 7, 2015, Los Angeles Christian Presbyterian Church, El Sereno

DEIR

The Statement of Purpose and Needs, as provided in all documents of the DEIR, is:

"The purpose of the proposed action is to effectively and efficiently accommodate regional and local north-south travel demands in the study area of the western San Gabriel Valley and east/northeast Los Angeles, including the following considerations:

- Improve efficiency of the existing regional freeway and transit networks.

- Reduce congestion on local arterials adversely affected due to accommodating regional traffic volumes.
- Minimize environmental impacts related to mobile sources.

"The lack of continuous north-south transportation facilities in the study area has the following consequences, which have been identified as the elements of need for the project:

- Degradation of the overall efficiency of the larger regional transportation system
- Congestion on freeways in the study area
- Congestion on the local streets in the study area
- Poor transit operations within the study area"

The Study Area for the SR 710 North Project is generally referenced as the western San Gabriel Valley and east/northeast Los Angeles. The Study Area boundaries include Interstate 210 (I-210) to the north, Interstate 605 (I-605) to the east, Interstate 10 (I-10) to the south, and Interstate 5 (I-5) and State Route 2 (SR 2) to the west.

Project Alternatives

Caltrans, in cooperation with Metro, proposed transportation improvements to improve mobility and relieve congestion in the Study Area, while minimizing the ensuing environmental impacts. In order to meet these objectives, the following Project alternatives were developed for the SR 710 North Study:

- **No Build Alternative:** The California Environmental Quality Act Guidelines requires that a "No Project" alternative be evaluated to provide a baseline for the comparison of impacts for the other alternatives. The No Build includes projects and planned improvements through 2035, including those contained in *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future* (Southern California Association of Governments [SCAG], April 2012), the Federal Transportation Improvement Program (FTIP), Measure R, the funded portions of Metro's 2009 Long Range Transportation Plan (LRTP), as well as the California High Speed Rail (HSR) project.
- **Transportation System Management/Transportation Demand Management (TSM/TDM) Alternative:** Federal Regulations require that a TSM/TDM Alternative be considered on all proposed major highway projects in urban areas. TSM/TDM is predicated on a series of surface street and operational improvements, along with active transportation and transit enhancements/refinements.
- **Bus Rapid Transit (BRT) Alternative:** The BRT Alternative was considered to provide high-speed, high-frequency bus service through a combination of new, dedicated bus lanes and mixed-flow traffic lanes to key destinations between East Los Angeles and Pasadena. BRT builds upon TSM/TDM and adds specific transit enhancements/refinements.

- Light Rail Transit (LRT) Alternative: The LRT Alternative includes a passenger rail line, along a dedicated route, which would serve key destinations between East Los Angeles and Pasadena. LRT similarly builds upon TSM/TDM with modifications to accommodate a light rail solution.
- Freeway Tunnel Alternative: The Tunnel Alternative would introduce a tunnel connection between Pasadena and Alhambra; this builds upon TSM/TDM with modifications to provide connectivity between the north and south stubs of the 710.

The City of Alhambra has previously expressed interest and support for a Tunnel Alternative for the SR 710 North Study. While the DEIR studied a number of tunnel variations, for the purposes of this evaluation, the Dual Bore Tunnel with Toll variation was selected due to the available roadway capacity and potential for providing a cost effective solution. Therefore, all references to the Tunnel Alternative in this evaluation are to the Dual-Bore Tunnel with Toll variation.

The Transportation Report evaluated the performance and potential impacts of each of the above alternatives for various statistical performance measures. The Transportation Report utilized the SCAG Travel Demand Model to prepare analyses for the 2035 horizon year; the model forecasts travel behavior and demand, based on a series of inputs and assumptions derived from actual data. The Transportation Report evaluated each alternative relative to overall transportation system and highway performance measures, transit performance measures and traffic operations/volumes.

COMMENTS

Based on our review of the documentation, GTC submits the following comments:

COMMENT 1: ADEQUACY OF THE ANALYSIS

GTC finds the methodology and analysis of the Transportation Report to be consistent with the state of the practice for the analysis of large-scale transportation alternatives.

COMMENT 2: DEIR UNDERESTIMATES THE BENEFITS OF THE TUNNEL ALTERNATIVE

While the DEIR provides a comprehensive analysis of the SR 710 North Study, the presentation of those results may have unintentionally deemphasized the potential benefits of the Tunnel Alternative.

GTC examined the statistical performance of the project, as documented in the DEIR, and prepared visual representations comparing the alternatives.

System Performance

The system performance measures used in this evaluation are defined below.

- Vehicular Travel Distance identifies the changes in total vehicle miles traveled (VMT) of each alternative, for both automobiles and trucks.
- Vehicular Travel Time identifies the changes in total vehicle hours traveled (VHT) by each alternative, for both automobiles and trucks.
- The Daily Person Throughput identifies the total number of person trips crossing an east-west screenline by each alternative, for both vehicular and transit trips.

Both the VMT and VHT have been calculated specific to the Study Area as well as the SCAG modeling region; in addition, these measures are provided in a daily and combined AM and PM peak period value. Much of the data presented in the DEIR is presented in terms of the number of vehicles or persons crossing a screenline drawn across the center of the Study Area. Figure 1 illustrates the east-west screenline.

Travel behavior will be affected by transportation improvements made throughout the system. Depending on the alternative, the amount of travel may increase (travelers may take longer trips to different destinations due to increased mobility) or decrease (shift from autos to transit)¹. The increase in travel distance may not necessarily translate to an increase in travel time (more capacity may increase travel distance and decrease travel time for all travelers).

Figures 2A and 2B, respectively, illustrate the daily VMT and VHT across the SCAG region for each alternative. Figures 3A and 3B, respectively, illustrate the daily VMT and VHT within the localized Study Area. Figure 4 depicts the daily person throughput across the Study Area screenline. Table 1 provides additional detail on the comparison of the system performance measures by alternative.

Regional Analysis. The Tunnel Alternative projects a daily VMT change of +0.08%, while the VMT change of other alternatives ranges from -0.02% to +0.01%. The change in VHT is projected at -0.21% with the Tunnel Alternative, as compared to a range of -0.03% to +0.09% with the other alternatives. These patterns hold when examining the VMT and VHT of the combined AM and PM peak period; the Tunnel Alternative results in the largest percentage of change from the No Build Alternative, when compared to the other alternatives.

Study Area Analysis. Similar to the regional comparison, the Tunnel Alternative also projects the greatest percentage of change from the No Build Alternative within the Study Area. The daily VMT projects change of +1.63%, whereas the other alternatives project change ranging from +0.16% to +0.28%. Relative to VHT, a change of -3.12% is projected with the Tunnel Alternative; this compares to -0.57% to 0.0% with the other alternatives. A similar pattern exists with the combined AM and PM peak period measures. The daily person throughput across the Study Area screenline projects the greatest increase of +2.74% with the Tunnel Alternative, whereas the other alternatives range from +0.25% to +0.47%.

¹ Transportation Report, Section 4.1.1

Summary. Relative to System Performance, the Tunnel Alternative is projected to result in increases to VMT and person throughput along with a decrease in VHT. This implies that the Tunnel Alternative is able to move more persons through the system, as demonstrated by the daily person throughput, to greater distances and in less time than the other alternatives.

The Tunnel Alternative has the potential to annually save over 6.7 million hours of travel within the region when compared to the No Build Alternative. The vast majority of that travel time savings will be felt locally. Within the Study Area, the Tunnel Alternative potentially results in over 5.7 million hours of travel time saved while serving 22.9 million more person trips annually than the No Build Alternative. No other alternative comes close to this level of travel time savings or increased person throughput.

Highway Performance

The highway performance measures used in the analysis are defined below:

- Traffic Volume Served is expressed as regional north-south vehicular travel crossing the east-west screenline on both the freeway and arterial systems. The freeway and arterial measurements provide an indication of how well the road system is working for regional and local trips.
- Traffic Diversion to Local Arterials shows the volume of traffic that uses the arterial street network instead of the freeway facilities, due to congestion or lack of freeway connectivity. This measure is applied to arterial system in the Study Area only and is expressed in VMT.
- Use of Local Arterials for Long Trips is a performance measure that provides the percentage of vehicle trips on the arterial system that cut through the Study Area (i.e., trips that do not have an origin or destination inside the Study Area).
- Travel Time Improvement is the number of regional trips in the No Build Alternative that would experience a reduction in travel time in comparison to the Build Alternatives. These trips would not have to use the improvements provided in the Build alternatives but would benefit from them.

Figure 5 illustrates the arterial and freeway traffic volumes served across the screenline for each alternative, while Figure 6 illustrates the traffic diversion to local arterials. Table 2 also details the traffic volume and VMT comparisons for the Highway Performance Measures by alternative.

An operational comparison of the alternatives is shown below:

HORIZON YEAR (2035) OPERATIONAL PERFORMANCE MEASURES BY ALTERNATIVE

Performance Measure	No Build	TSM/TDM	BRT	LRT	Tunnel
Use of Local Arterials for Long Trips					
PM Peak Period Percent Cut-Through	13.7%	14.3%	14.2%	14.0%	7.8%
Travel Time Improvement					
Percent of AM and PM Peak Period Trips More Than 2.5 Minutes Faster Than No Build	0%	0%	0%	3%	10%

Traffic Volume Served. Within the Study Area, the Tunnel Alternative is projected to result in a change of -9.19% in arterial traffic volume, whereas the other alternatives range from +1.02% to +1.14%. Thus, the Tunnel Alternative is the only Build Alternative that has the potential to reduce traffic on the arterial streets within the Study Area. Conversely, freeway volume is projected to change by +13.05% with the Tunnel Alternative, compared to -0.29% to -0.19% for the other alternatives. Again, the Tunnel Alternative is the only alternative that removes vehicular traffic from the local arterial streets and puts it back on the freeway system.

Traffic Diversion to Local Arterials. Compared to the No Build Alternative, the Tunnel Alternative is projected to result in a change in arterial VMT of -6.42% within the Study Area. The other alternatives project an arterial VMT change ranging from -0.12% to +0.49%.

Use of Local Arterials for Long Trips. Compared to the No Build Alternative, the Tunnel Alternative projects that 7.8% of PM peak hour traffic cuts through the Study Area arterials. By comparison, the other alternatives project a level of cut-through traffic of 13.7% to 14.3% on Study Area arterials. The three other Build Alternatives actually increase the use of local arterial streets for long trips as compared to the No Build Alternative.

Travel Time Improvement. During the AM and PM periods, the Tunnel Alternative projects that 10% of trips could experience a travel time reduction greater than 2.5 minutes. By comparison, the LRT Alternative projects that 3% of those AM and PM peak hour trips could experience a similar travel time improvement, while the TSM/TDM and BRT Alternatives offer no such travel time improvement.

Relative to Highway Performance, the Tunnel Alternative indicates a projected reduction in arterial street traffic and an increase in freeway volume; corresponding decreases in arterial cut-through traffic and travel time (by at least 2.5 minutes) are also projected. This suggests that the Tunnel Alternative benefits arterial streets by shifting regional traffic to the freeways and decreasing travel time.

Transit Performance

The transit performance measures used in this analysis are defined below:

- **New Transit Trips** identifies the number of new transit taken by people who choose to use transit services and who would have otherwise used a different mode for travel.
- **Transit Mode Share** represents the percentage of total daily person trips utilizing transit; this was calculated based on daily trips in the study area.
- **North-South Transit Throughput** represents the total daily person trips, using transit services, which traverse the study area screenline.
- **Transit Accessibility** is the percentage of the Study Area population located within 0.25 mile of a transit stop with high frequency service (peak headways less than 15 minutes).

Table 3 details the comparison of the transit performance measures.

New Transit Trips. As indicated in Table 3, the Tunnel Alternative is projected to experience an increase of 10,300 new transit trips, compared to 11,250-15,350 new transit trips for the other alternatives. Thus, all of the Build Alternatives are essentially transit neutral when it comes to the number of net new transit trips supported by the Build Alternatives. The total difference in transit patronage among all of the Build Alternatives is only 4,950 daily transit trips out of over 3 million daily person trips in the Study Area.

Transit Mode Share. During the 2035 Horizon Year, the transit mode share for each alternative is nearly identical; the largest increase would be 0.1% in the BRT and LRT Alternatives. Again, the Build Alternatives are essentially transit neutral.

North-South Transit Throughput. The number of daily person trips by transit crossing the screenline in the Tunnel Alternative is projected at 212,000 person trips. This compares to 209,000 person trips in the No Build Alternative and 211,000-215,000 person trips in the TSM/TDM, BRT, and LRT Alternatives.

Transit Accessibility. During the 2035 Horizon Year, the percentage of transit accessibility for each alternative is nearly identical; the largest increase would be 0.1% in the BRT and LRT Alternatives.

Relative to Transit Performance, the Tunnel Alternative is projected to increase transit trips and person throughput when compared to the No Build Alternative. The TSM/TDM, BRT, and LRT Alternatives would provide greater increases than the Tunnel Alternative because they are more transit intensive. These increases, however, should also be considered relative to the projected percentages of transit mode share and transit accessibility. With the exception of the minor increase in the BRT and LRT Alternatives, the transit mode share and transit accessibility measures are nearly identical across the Build Alternatives.

On-Street Parking Loss

The DEIR included a parking assessment that identified potential impacts to existing on-street parking spaces associated with each Build Alternative. The parking losses are characterized as either temporary or permanent. Temporary parking loss is associated with peak hour parking restrictions, while permanent parking loss is associated with those improvements that would not replace the lost parking. Table 4 details the parking losses across the alternatives.

As shown in Table 4, the TSM/TDM Alternative would result in 26 spaces temporarily lost during the weekday AM and PM peak periods, all in Alhambra, and 220 spaces permanently lost, the majority of which is concentrated in Alhambra and Los Angeles, with losses in San Gabriel, San Marino, and South Pasadena as well.

The BRT Alternative would result in the temporary loss of 1,047 spaces during the weekday AM and PM peak periods. A substantial portion (77%) of this temporary parking loss would occur in Monterey Park and South Pasadena; the remainder would occur in Alhambra, Los Angeles, and Pasadena. A total of 96 spaces in Alhambra, Los Angeles, Monterey Park, Pasadena, and South Pasadena would be permanently lost during all hours of the day.

The LRT Alternative would not cause the loss of AM or PM peak hour on-street parking; a total of four spaces would be permanently lost in South Pasadena.

The Tunnel Alternative would not cause the loss AM or PM peak hour on-street parking, nor would any parking spaces be permanently lost.

COMMENT 3: THE DEIR DID NOT DO A THOROUGH JOB OF PRESENTING THE OVERALL EFFECTS OF TRAFFIC SHIFTS AS A RESULT OF THE ALTERNATIVES

Although the DEIR provided a comprehensive analysis of the performance measures of each alternative, those analyses primarily focused on north-south movement through the Study Area. Little discussion was given relative to east-west movement through the Study Area, possibly understating the potential effects of each alternative.

Traffic volumes across the arterial and freeway system are the fundamental data used to calculate several of the performance measures discussed above. While the traffic volume data was provided in the DEIR, the traffic volumes themselves were not explicitly discussed.

GTC prepared a comparison of traffic volumes for select alternatives and for all directions of travel, utilizing the traffic volumes for select alternatives from Appendix D of the AQ Report, which in turn utilized the Transportation Report volumes prepared using the SCAG Travel Demand Model.

GTC compared the traffic volumes presented for the 2035 Horizon Year analyses of the TSM/TDM and Tunnel Alternatives along with the Freeway Level of Service (LOS) exhibits for the Tunnel Alternative. The Tunnel Alternative was calculated as a percentage change from TSM/TDM. A threshold of +/-5% was utilized, which represents a change of one-half LOS. The traffic volumes are presented as Average Daily Traffic (ADT) for passenger vehicles and trucks, respectively expressed as ADT and Truck ADT. This comparison illustrates the potential traffic

shifts in both the north-south and east-west directions, highlighting the potential benefits and impacts of the selected alternatives.

Tables 5A and 5B detail the arterial and freeway segments selected for this comparison along with the traffic volumes provided in the Transportation Report. Of the freeway segments identified, those labeled between points of an interchange were not included. Figures 7A and 7B illustrate the traffic volume differences across the Study Area and Figures 8A and 8B illustrate the differences in the immediate vicinity of Alhambra. The color coding represents an increase (red) or decrease (green) in the Tunnel Alternative traffic volume, relative to the TSM/TDM Alternative.

ADT

As illustrated, the effect of the Tunnel Alternative on the arterial and freeway system is consistent with the evaluation of Highway Performance discussed above; traffic volume is drawn to the freeways, relieving arterials across the Study Area. This effect is pronounced in the immediate vicinity of the north and south portals and through Alhambra. ADT volumes are projected to increase on SR 710 and I-210 with decreases projected along Huntington Drive, Main Street, and Fremont Avenue. This effect is not isolated to the immediate vicinity; ADT increases are projected on Colorado Boulevard and Foothill Boulevard. The arterial ADT reduction pattern extends to Eagle Rock Boulevard/Cypress Avenue, and Figueroa Street to the west and San Gabriel Boulevard, Rosemead Boulevard, Santa Anita Avenue, and Peck Road to the east. Also notable are segments of SR 2, I-5, and SR 110 with a projected decrease in ADT. As shown, reductions in ADT volume are apparent in the north-south direction, along with some improvements in the east-west direction.

Truck ADT

The pattern of Truck ADT is consistent with passenger ADT, where truck volume is generally drawn toward the freeways from the arterials. Again, the effect is pronounced near the portals and in Alhambra. Increased Truck ADT is projected along SR 134, I-210, and SR 710; a decrease in arterial Truck ADT is projected along Huntington Drive, Main Street, Valley Boulevard, and Fremont Avenue. The wider ranging impact of Truck ADT redistributing to the Tunnel is clear through the Study Area. Continuous segments along SR 2, I-5, I-10, I-605, and I-210 are projected to experience a decrease in Truck ADT. Similarly, continuous segments of arterials (i.e., Eagle Rock Boulevard/Cypress Avenue, Figueroa Street, Huntington Drive, San Gabriel Boulevard, Rosemead Boulevard, Santa Anita Avenue, and Peck Road) also project decreases of at least 5% in Truck ADT. Even more dramatically than the ADT volumes above, the comparison of Truck ADT indicates clear improvements to east-west movement through the Study Area, in addition to the north-south direction.

The LOS along the freeway segments should be considered in conjunction with the projected changes in ADT and Truck ADT. As provided in the Transportation Report, Figures 9A and 9B illustrate the freeway LOS respectively projected for the Study Area during the AM and PM peak periods.

LOS with ADT/Truck ADT Increase

- An increase in Truck ADT is projected for SR 134 between SR 2 and I-210. This segment is projected to operate between LOS C and D during the AM peak period and between LOS C and E during the PM peak period.
- An increase in ADT and Truck ADT is projected for I-210 north of SR 134. This segment is projected to generally operate at LOS A/B in the northbound direction and LOS D in the southbound direction in the AM peak period. Short segments of LOS E and F operation would be experienced southbound in the AM peak period. In the PM peak period, LOS D northbound and LOS C southbound would predominate. In other words, despite the increase in vehicular traffic on this section of I-210, this freeway would continue to operate at a better LOS than any other freeway in the region.
- An increase in ADT and Truck ADT is projected for SR 710 at the north and south portals. These segments are projected to operate generally at LOS C.

LOS with ADT/Truck ADT Decrease

- A decrease in ADT and Truck ADT is projected for SR 2 between I-5 and I-210. This segment is projected to generally operate between LOS A/B and C during the AM and PM peak periods.
- A decrease in ADT and Truck ADT is projected for I-5 between SR 2 and I-10. This segment is projected to primarily operate at LOS D to F.
- A decrease in Truck ADT is projected for I-10 between I-5 and SR 710. The projected operation through this segment is LOS A/B and C with short segments of LOS E.
- A decrease in Truck ADT is projected for I-210 between SR 710 and I-605. The projected operation through this segment is LOS C to F.
- A decrease in Truck ADT is projected for I-605 between I-210 and I-10. This segment is projected to primarily operate at LOS C and D with shorter segments at LOS E/F.

The volume comparison clearly illustrates the potential shifts of ADT/Truck ADT in the Study Area as a result of the Tunnel Alternative. While an increase in ADT/Truck ADT results along I-210 (north of the tunnel), that segment of freeway is projected to primarily operate at LOS D or better during the AM and PM peak hours, which is generally considered as acceptable operation within an urbanized environment. This focused increase in ADT/Truck ADT is tempered by the corresponding decreases in arterial ADT/Truck ADT that extend throughout the Study Area.

By connecting the SR 710 gap with the Tunnel, the benefits to the arterial street network increase for all directions of travel.

COMMENT 4: PARKING PROHIBITIONS NEEDED FOR THE TSM/TDM AND BRT ALTERNATIVES MAY BE DIFFICULT TO IMPLEMENT

Adjacent cities have expressed support for the TSM/TDM and BRT Alternatives. However, these two alternatives depend on significant on-street parking prohibitions (either permanently or during the peak hours) in order to implement the reversible lanes and the exclusive bus lane strategies.

The parking prohibitions are needed through the heart of the business districts in Pasadena and South Pasadena and, in our experience, these parking prohibitions are very difficult to get implemented.

If the cities' support for these alternatives does not include a commitment to prohibit peak hour parking through their business districts, the beneficial effects of the TSM/TDM and the BRT Alternatives will not be realized.

COMMENT 5: THE DEIR OVERSTATES THE EFFECTS OF THE NO BUILD ALTERNATIVE

As mentioned earlier in this memo, the No Build Alternative includes projects and planned improvements through 2035, including those contained in the SCAG RTP/SCS, FTIP, Measure R, L RTP, and HSR projects.

It is highly unlikely that ALL of the planned and programmed improvements in the SCAG RTP/SCS and the FTIP will actually be implemented by 2035. This is not a criticism of the DEIR, but it should be pointed out in the DEIR that the travel performance of the transportation system under the No Project Alternative is extremely optimistic and unlikely to be achieved. Thus, the performance of the alternatives is likely to be better than shown in the DEIR.

COMMENT 6: MOST OF THE TUNNEL ALTERNATIVES STUDIES ARE UNREALISTIC

The DEIR analyzes a number of tunnel variations even though most of the variations are unfeasible. Without a Public Private Partnership (PPP) and without tolls for travel through the tunnel, the tunnel most likely cannot be financed. Therefore, the analysis of variations that do not include tolls presents an illusionary condition that will probably never be realized and unnecessarily complicates the DEIR.

COMMENT 7: THE BENEFITS OF THE TUNNEL ALTERNATIVE ARE NOT STUDIED FOR MUCH OF EAST LOS ANGELES

The boundaries of the Study Area are drawn such that much of East Los Angeles is outside of the Study Area. Therefore, the trip-reduction effects of the Tunnel Alternative on the streets in East Los Angeles are not specified and instead are grouped into the "Regional Effects" category. This makes it difficult for the community of East Los Angeles to evaluate the positive effects of the Tunnel Alternative on its streets.

COMMENT 8: THE DUAL BORE TUNNEL WITH TOLLS IS THE ALTERNATIVE THAT BEST MEETS THE PROJECT'S STATEMENT OF PURPOSE AND NEEDS

The matrix below distills the results of these multiple transportation analyses into an evaluation against the SR 710 North Study Statement of Purpose and Needs. The results of each Build Alternative are compared against the No Build Alternative.

PURPOSE AND NEEDS	No Build	TSM/TDM	BRT	LRT	Tunnel
1. Improve the efficiency of the existing regional freeway and arterial systems (i.e., How much is the time spent on the road reduced?)	12,107 Vehicle Hours Traveled	-0.01% Reduction	-0.03% Reduction	+0.09% Increase	+0.24% Increase
2. Increase in regional transit ridership (i.e., Are people more likely to use public transit in the region?)	New Transit Trips	+11,250 Increase	+13,500 Increase	+15,300 Increase	+10,300 Increase
3. Increase in study area transit ridership (i.e., Are people more likely to use public transit in the study area?)	4.2% Transit Mode Share	4.2%	4.3%	4.3%	4.2%
4. Reduce congestion on local arterials adversely affected due to accommodating regional traffic volumes (i.e., Is there less cut-through traffic?)	13.7% PM Arterial Cut Through Traffic	+4% Increase	+4% Increase	+2% Increase	+3% Increase
5. Increase capacity; Increase north-south mobility (i.e., Does this move more people?)	3,210,000 Daily Person Trips Across Screenline	+0.25% Increase	+0.47% Increase	+0.40% Increase	+2.74% Increase
6. Reduce regional congestion (i.e., Will this reduce peak hour trips by at least 2.5 minutes?)	% Peak Hour Trips with ≥ 2.5 minute Travel Time improvement	No Change	No Change	+3% Increase	+2.5% Increase

Does not meet goal >>>>>>>>>>> Meets goal

The Tunnel Alternative would provide a greater degree of improved regional efficiency, essentially the same degree of new transit ridership and transit mode share, a greater reduction in the percentage of arterial cut-through traffic, a greater increase in person trip capacity, and a greater increase in travel time savings.

Based on the evaluation of data presented in the DEIR, the results support the City of Alhambra's position that the Tunnel Alternative would be the most effective solution to closing the existing SR 710 gap, improving regional mobility, and supporting the goal of congestion relief.

SUMMARY AND CONCLUSION

This evaluation of the DEIR focused on the transportation impacts of the TSM/TDM, BRT, LRT and Tunnel Alternatives. The “Dual Bore with Toll” operational variation of the various Tunnel Alternatives was selected for this evaluation, as it provides increased roadway capacity, the most cost effective tunnel variation, and financial construction feasibility.

Through review of the System Performance measures published in the DEIR, each of the alternatives demonstrates some level of increased mobility and decreased congestion. This was

determined through evaluation of the VMT, VHT, and daily person throughput measures. The Tunnel results in increases of up to 1.6% VMT across the region and within the Study Area. Conversely, the VHT and daily person throughput are projected to improve by approximately 3% across the region and within the Study Area. The other alternatives also result in changes to these performance measures; however, the findings indicate that the Tunnel Alternative promotes a greater magnitude of positive improvements to regional mobility, accessibility and congestion reduction.

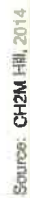
The evaluation of Highway Performance measured characteristics of traffic through the Study Area including screenline traffic volume, arterial VMT, cut-through traffic, and travel time. The Tunnel Alternative was found to reduce the arterial volume by over 9% while increasing the freeway volume by 13%, relative to overall Study Area traffic. These findings correspond to the approximately 6% reduction in arterial VMT and the approximately 40% decrease to the percentage of cut through traffic in the Study Area. The percentage of AM and PM peak hour trips with travel time savings increases by 10%. The other alternatives result in nominal changes to these performance measures. The findings continue to indicate that the Tunnel Alternative offers positive improvements to regional mobility and congestion reduction.

Transit Performance was evaluated by the number of new transit trips, mode share, Study Area person throughput, and transit accessibility. Although the Tunnel Alternative results in an improvement of over 10,000 new transit trips and an increased daily throughput of 3,000 person trips compared to the No Build Alternative, this level of change is less than those of the other alternatives. Interestingly, the levels of transit mode share and transit accessibility are effectively unchanged and the same across the alternatives. The findings indicate that the Tunnel Alternative would offer some transit performance improvements over the No Build Alternative, but suggest that the other alternatives may not offer an improvement as significant as anticipated.

A parking loss evaluation across the alternatives indicates that the Tunnel Alternative would not result in the temporary or permanent loss of any on-street parking. However, the TSM/TDM and BRT Alternatives would result in substantial loss of on-street parking spaces. In TSM/TDM, the majority of parking loss would be permanent; conversely, BRT would result in primarily peak period parking losses. The LRT Alternative would result in the permanent loss of four spaces.

A traffic volume comparison was performed, plotting the difference in traffic volume from the Tunnel Alternative relative to the TSM/TDM Alternative. This comparison utilized the ADT and Truck ADT data provided in the DEIR. Relative to ADT, the increase and decrease in traffic volume occurs in the anticipated locations, i.e., in the vicinity of each end of the tunnel and within Alhambra. The projected decreases in traffic, however, are not limited to areas within Alhambra; rather, ADT decreases are projected throughout the Study Area. This pattern is more pronounced when examining Truck ADT; the pattern of Truck ADT reduction extends from the freeways (SR 2, I-5, I-10, I-210, I-605) to continuous segments of the arterials (Eagle Rock Boulevard/Cypress Avenue, Huntington Drive, Fremont Avenue, San Gabriel Boulevard, Rosemead Boulevard, Santa Anita Avenue, Peck Road). This comparison corresponds to the results of the System Performance and Highway Performance evaluations, where the Tunnel Alternative offers improvements to regional mobility and congestion reduction.

Based on the analysis detailed above, the Dual Bore Tunnel with Tolls Alternative best meets the Project's Statement of Purpose and Needs.



EAST-WEST SCREENLINE

FIGURE 2A
DAILY VHT - REGIONAL

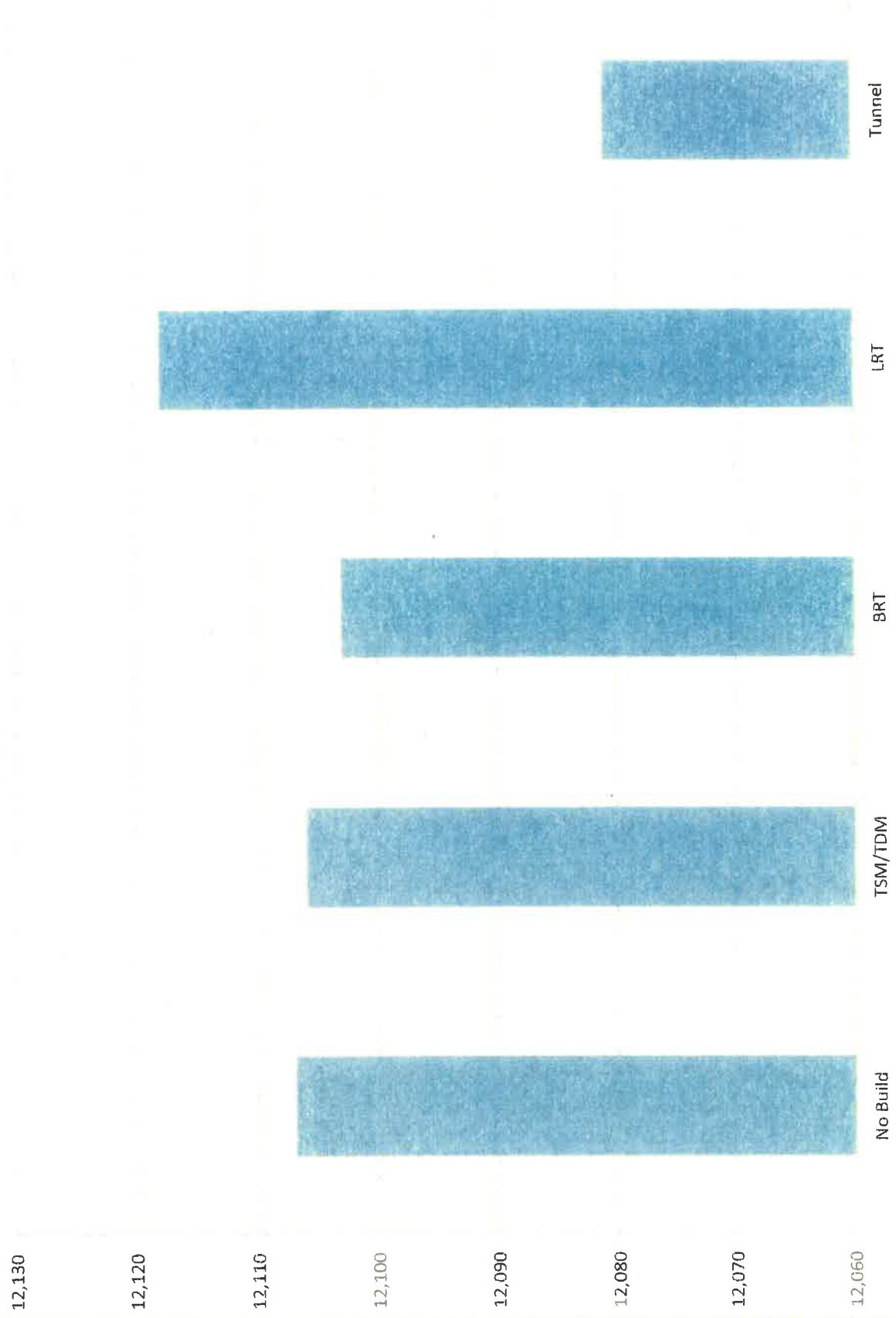


FIGURE 2B
DAILY VMT - REGIONAL

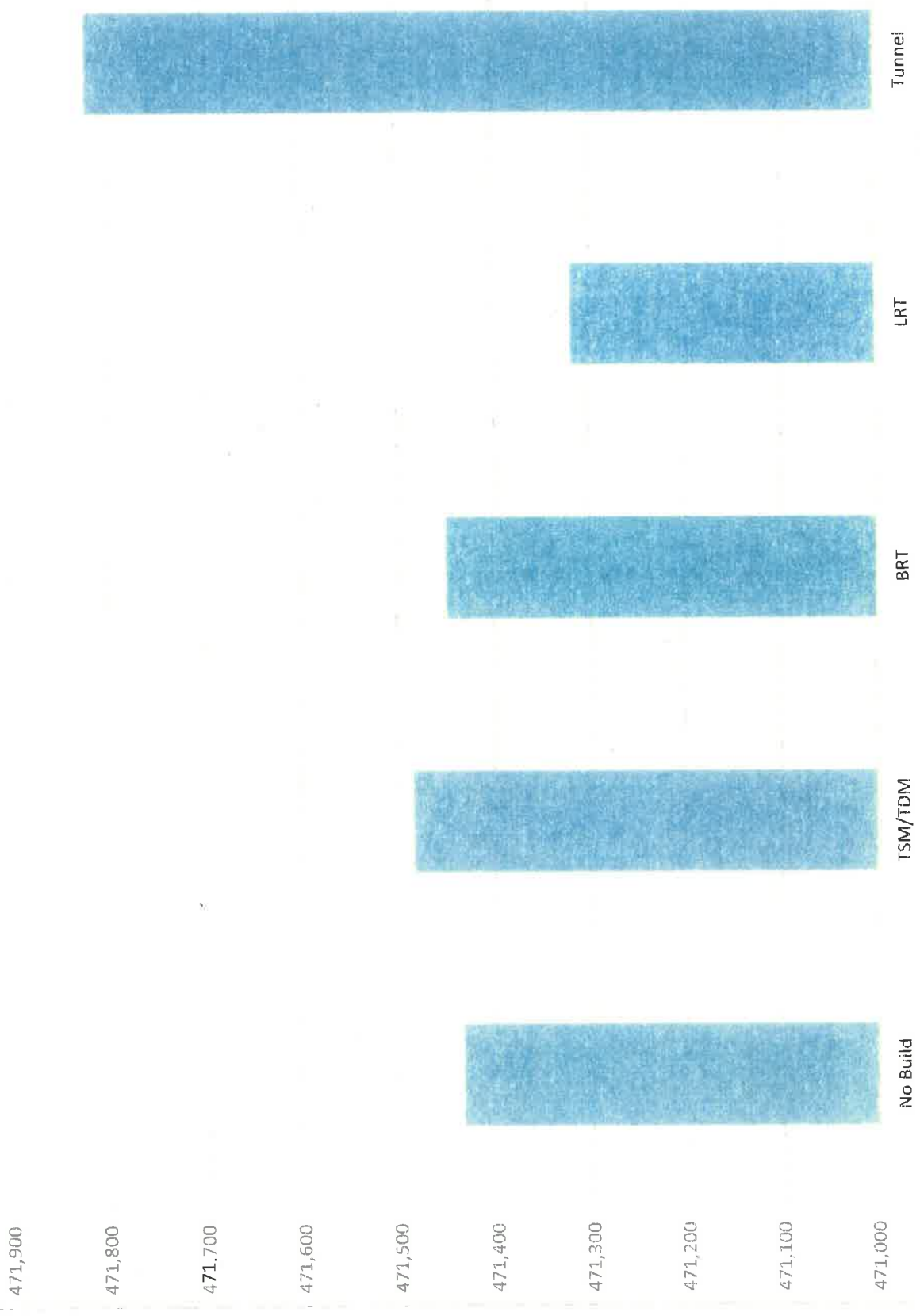


FIGURE 3A
DAILY VHT - STUDY AREA

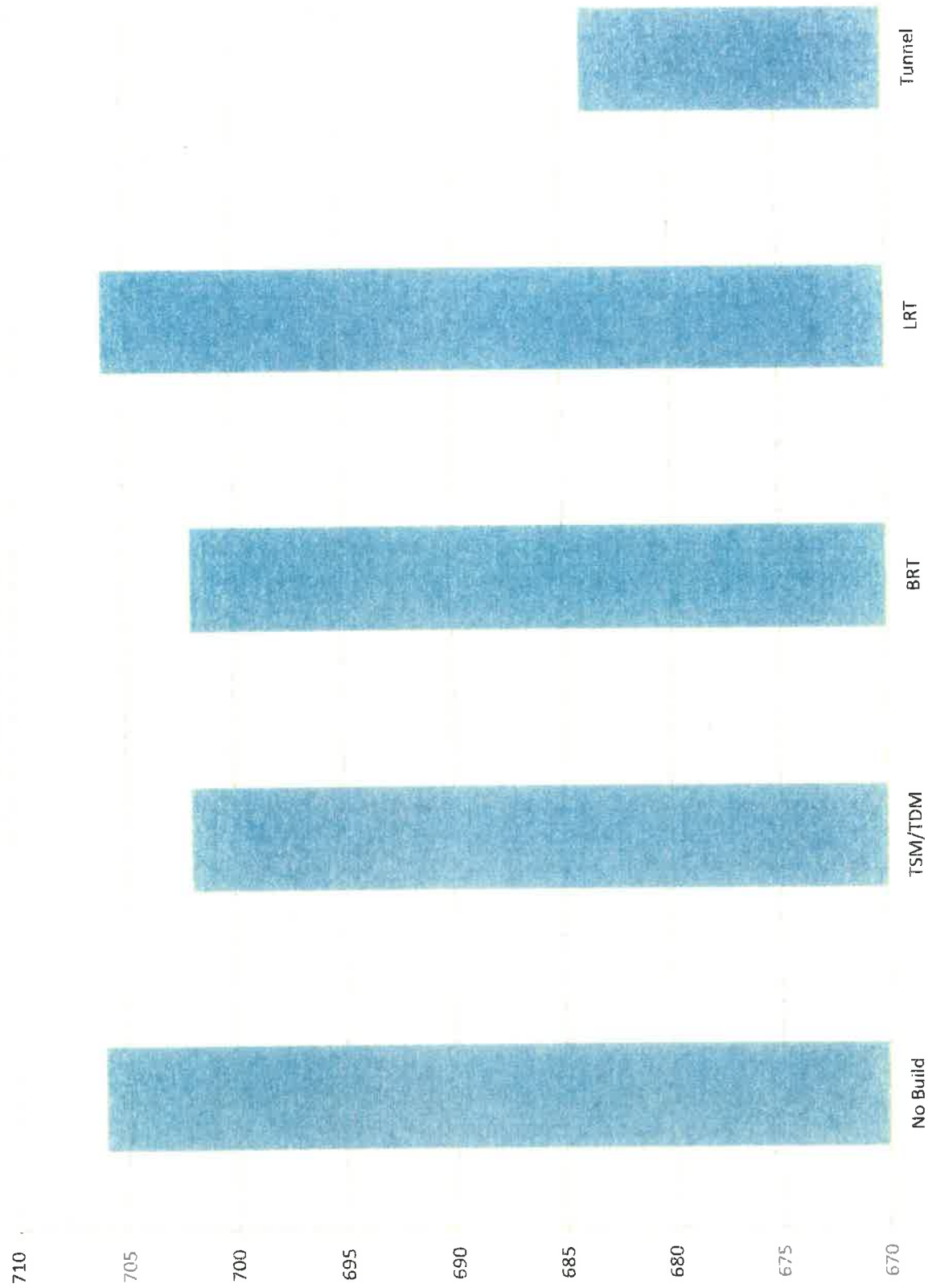


FIGURE 3B
DAILY VMT - STUDY AREA

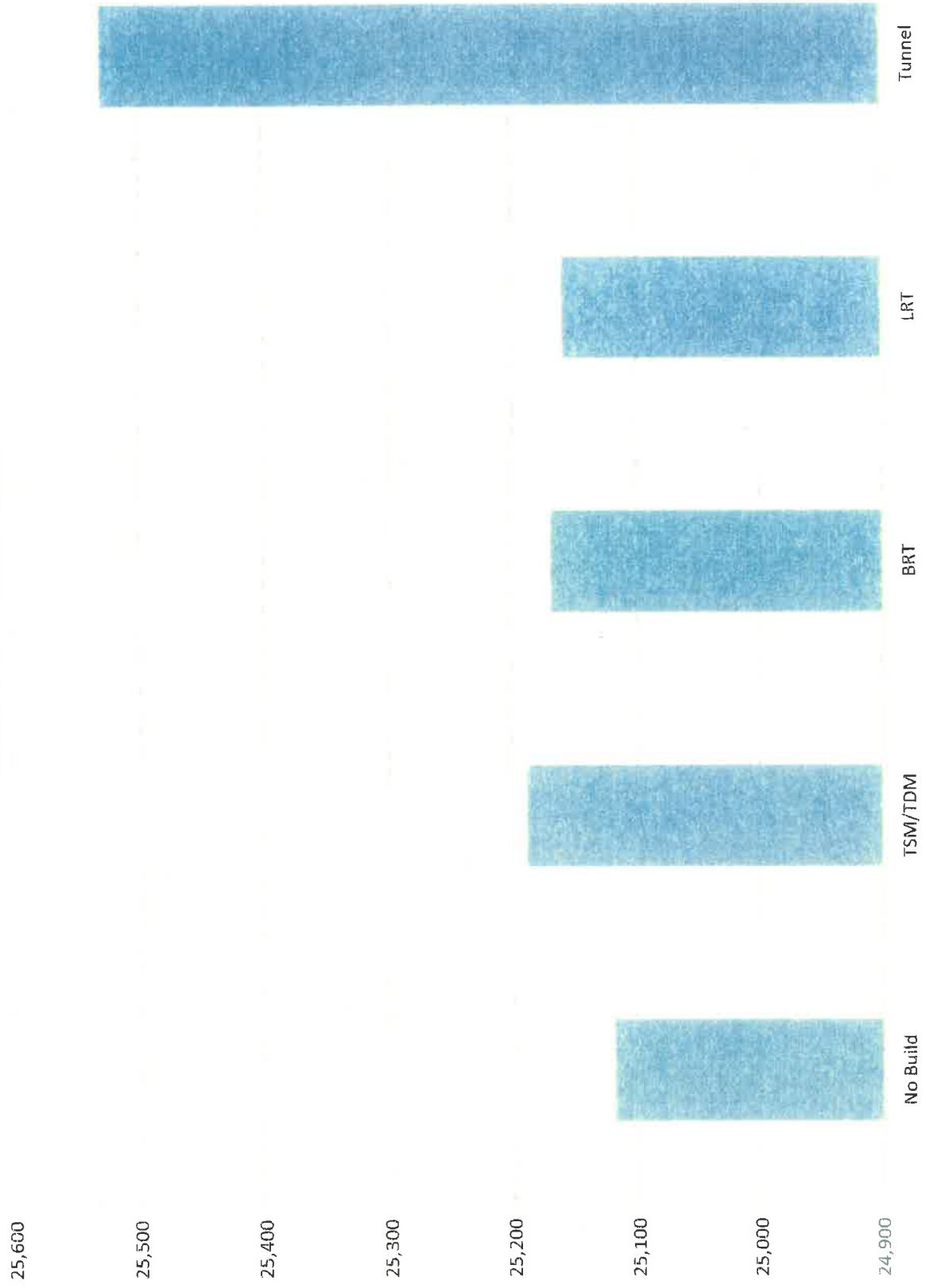


FIGURE 4
DAILY PERSON THROUGHPUT - STUDY AREA

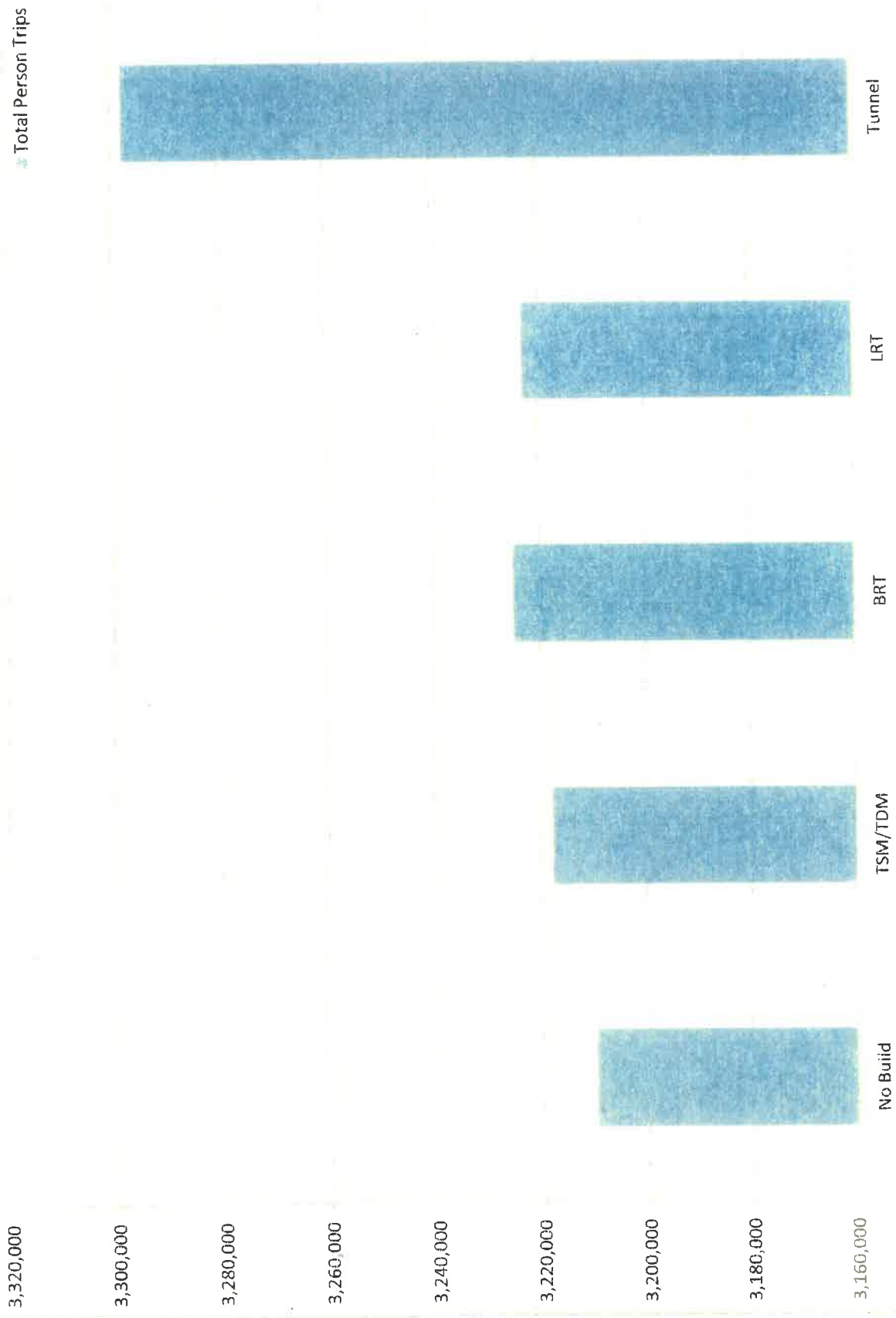


FIGURE 5
DAILY TRAFFIC VOLUME ACROSS SCREENLINE

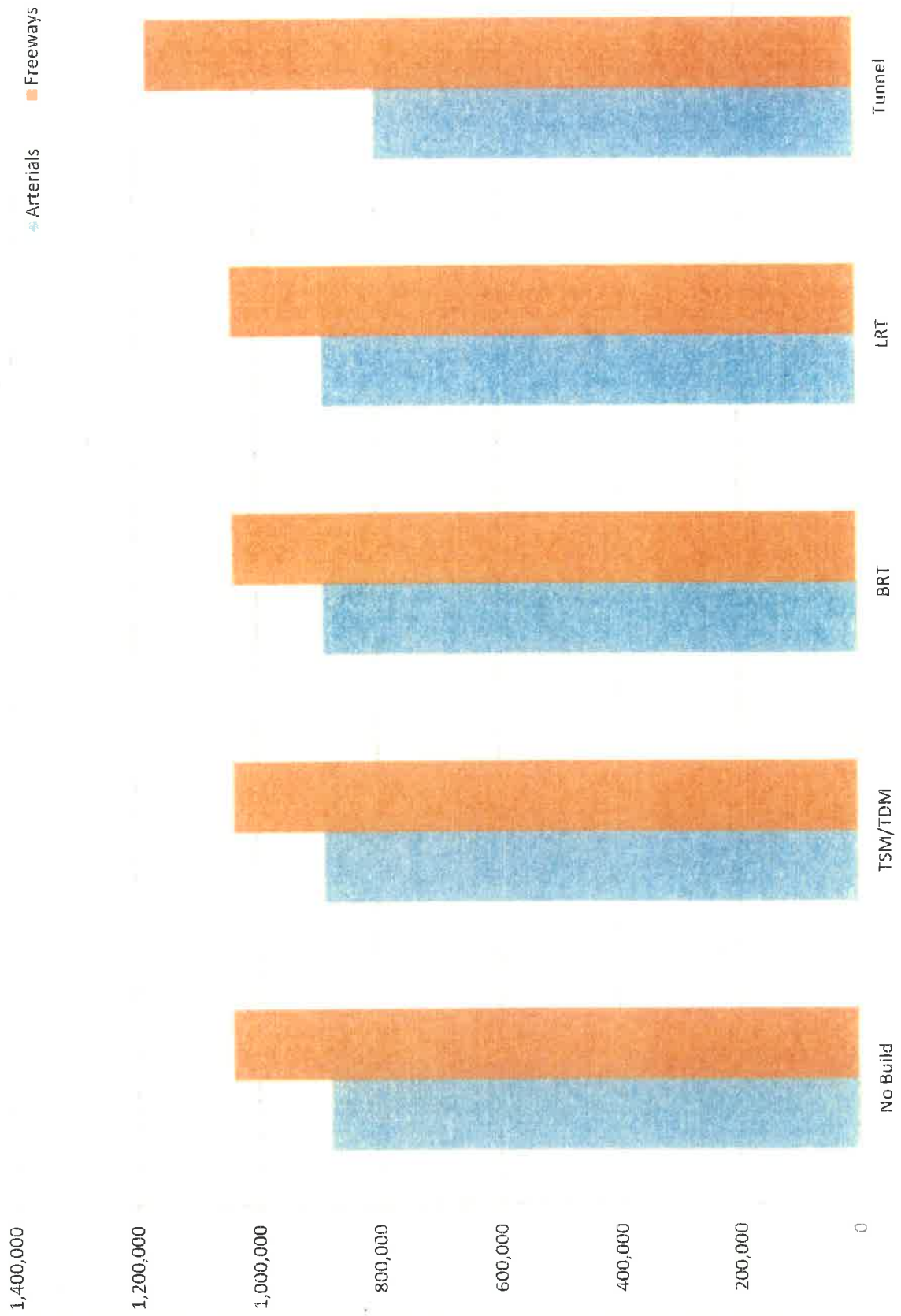
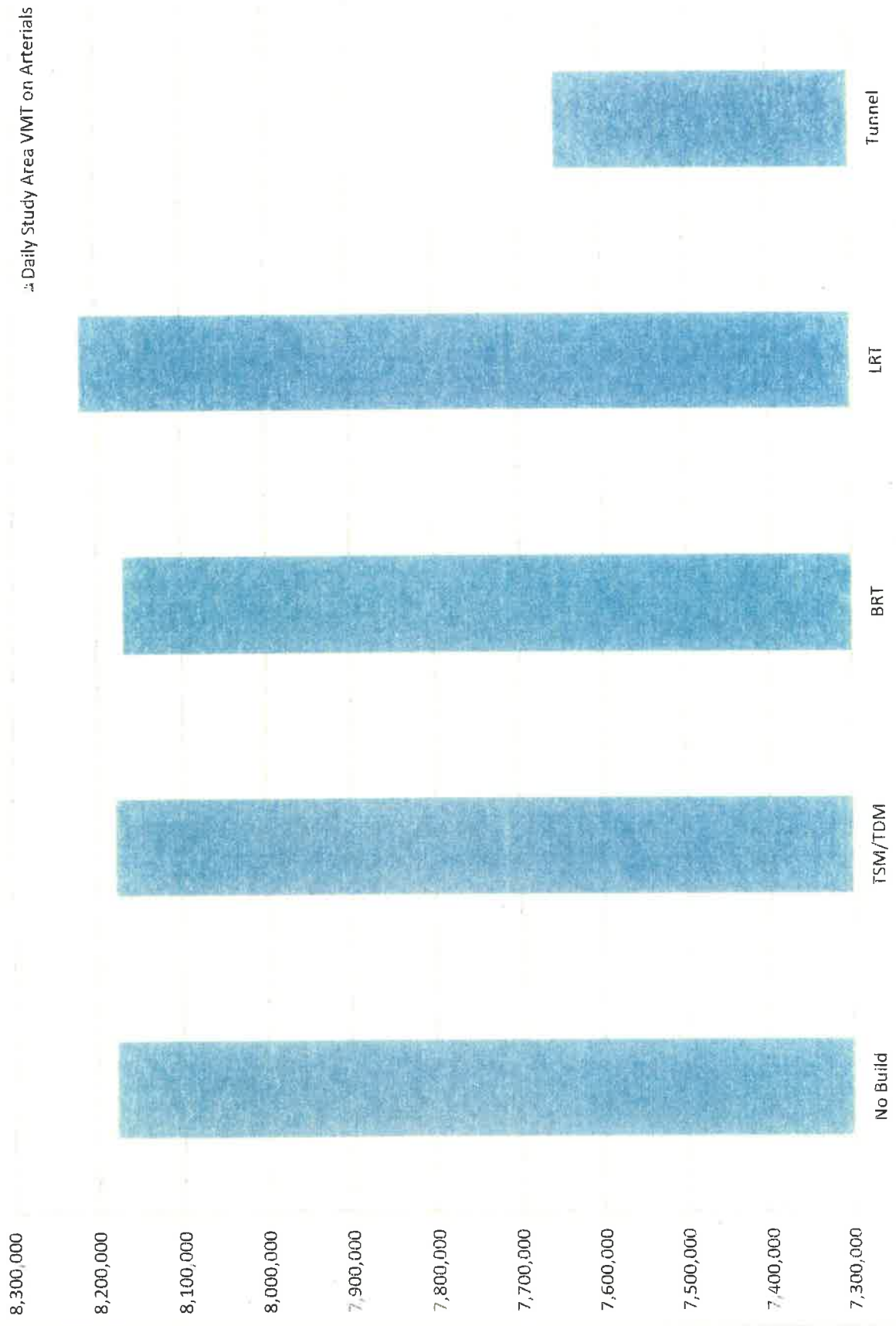
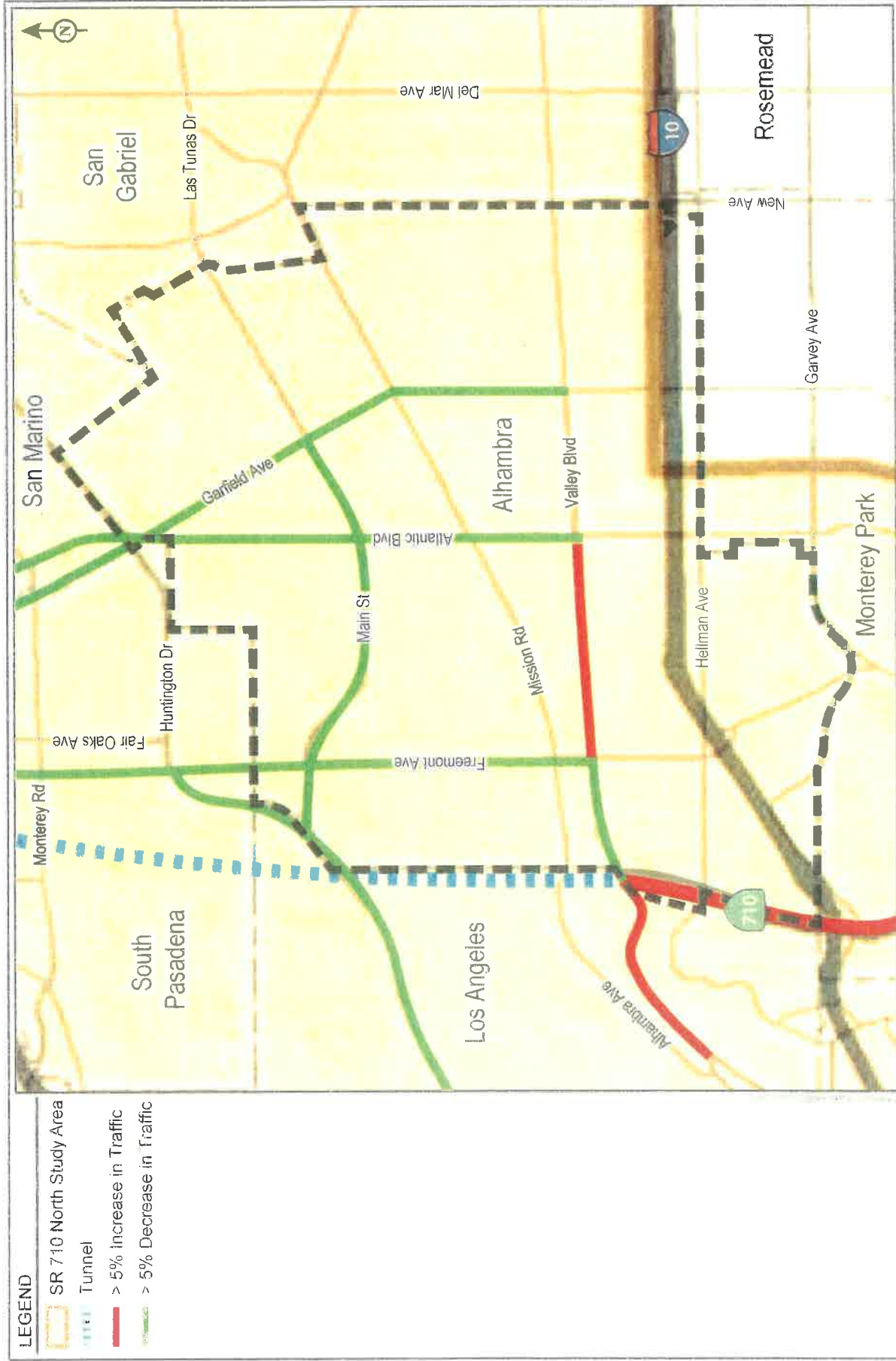


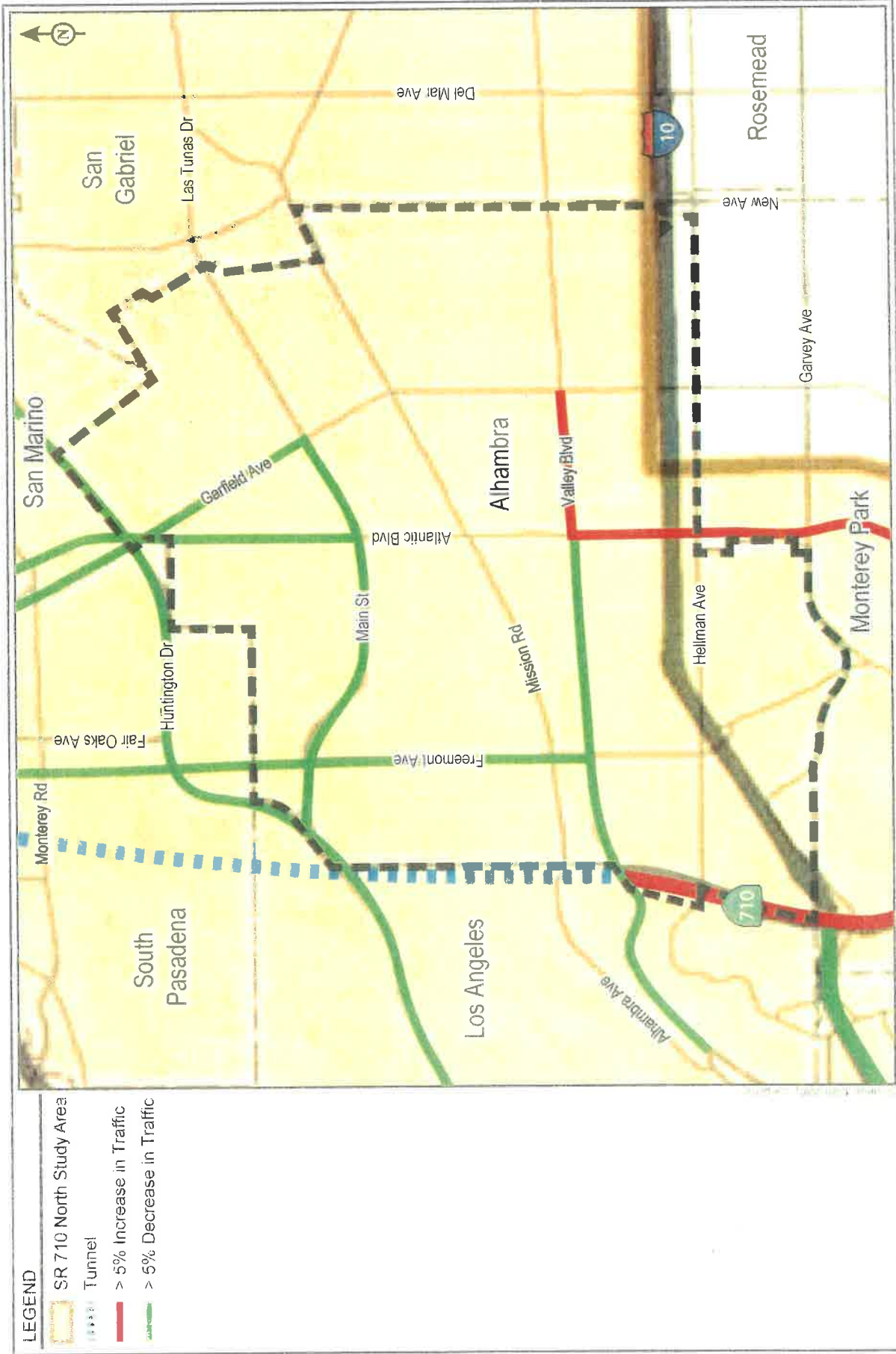
FIGURE 6
TRAFFIC DIVERSION TO LOCAL ARTERIALS





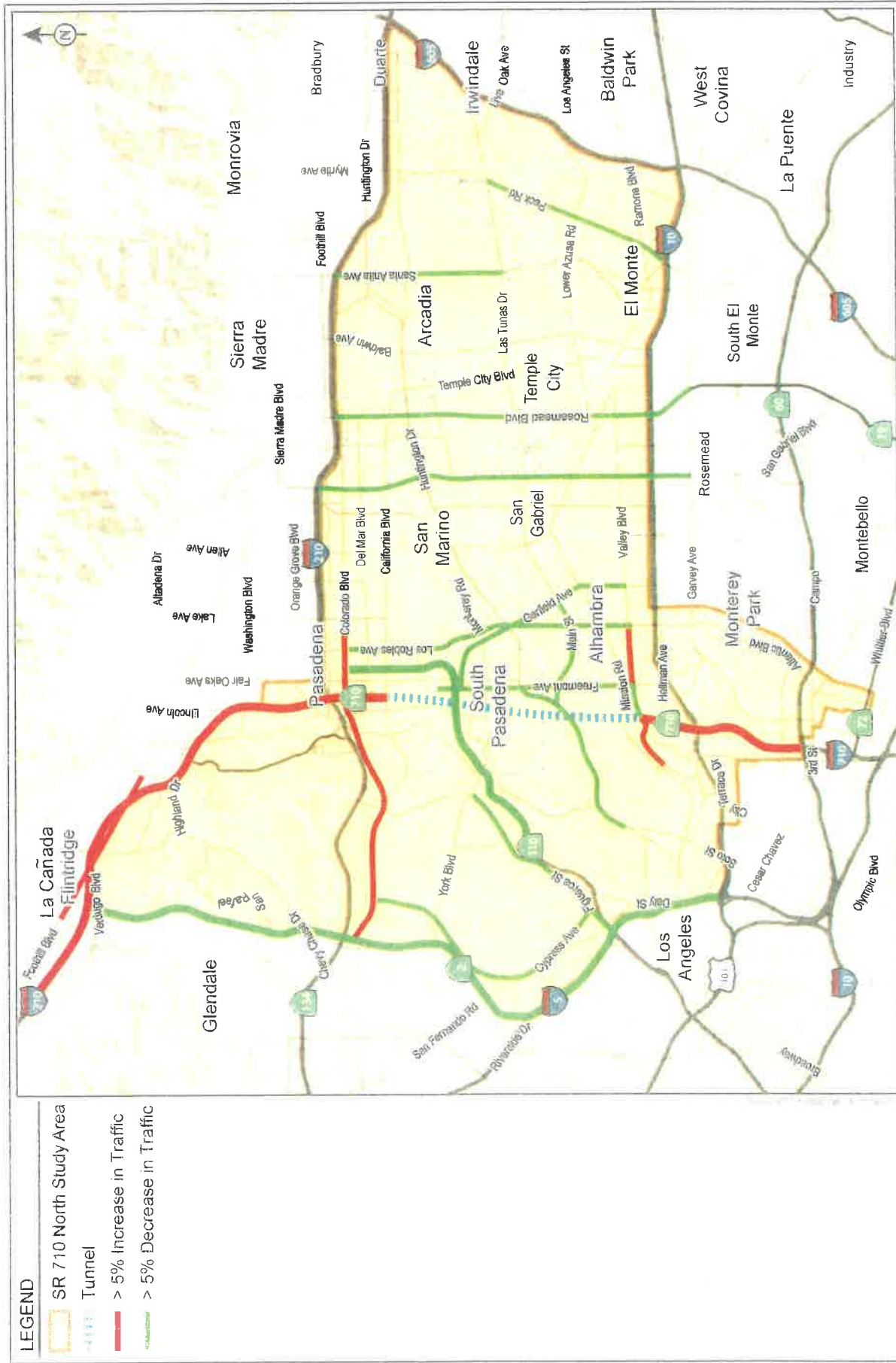
2035 AVERAGE DAILY TRAFFIC
TUNNEL VS TSM/TDM

FIGURE
7A



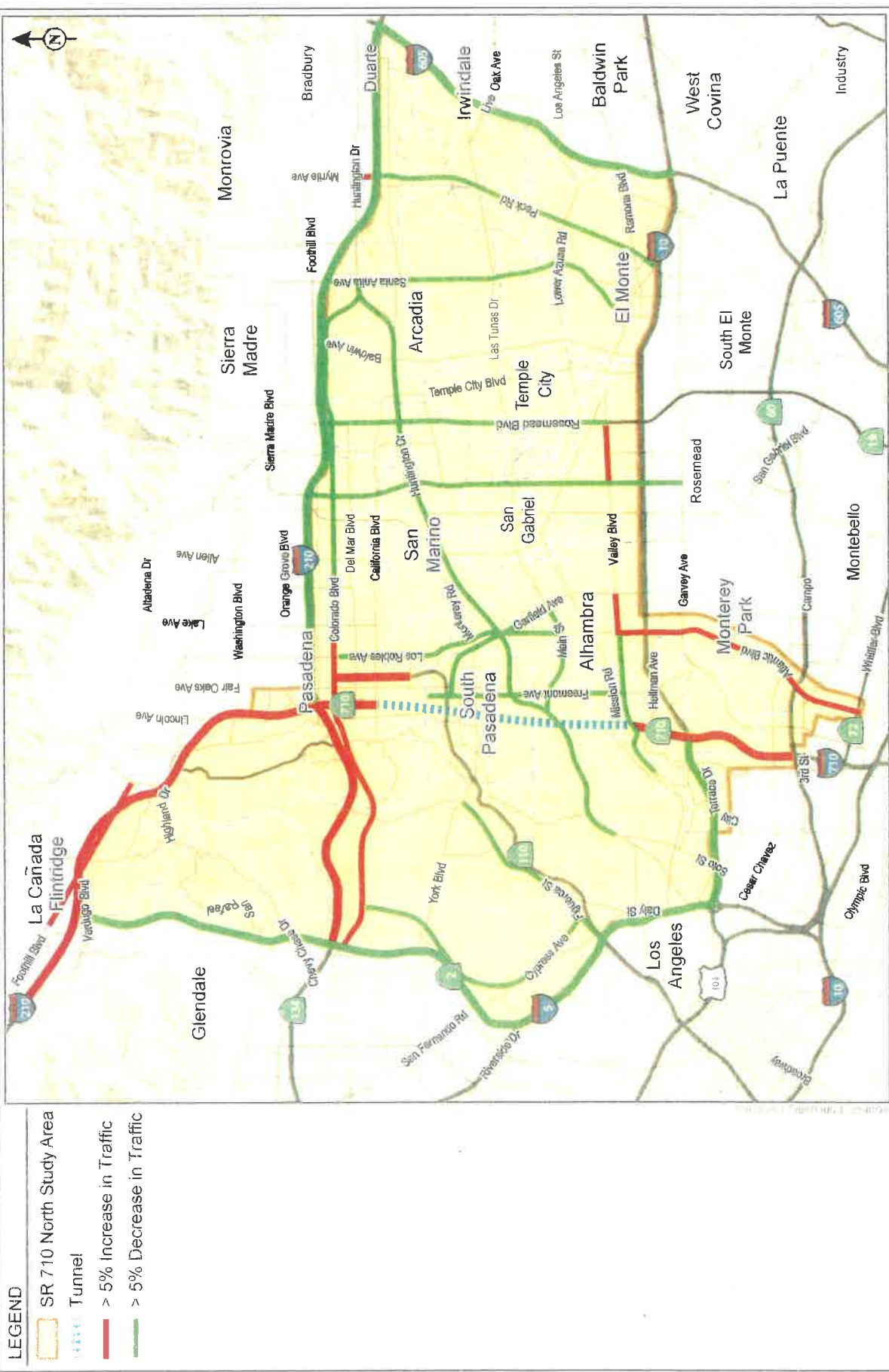
2035 TRUCK TRAFFIC
TUNNEL VS TSM/TDM

FIGURE
7B



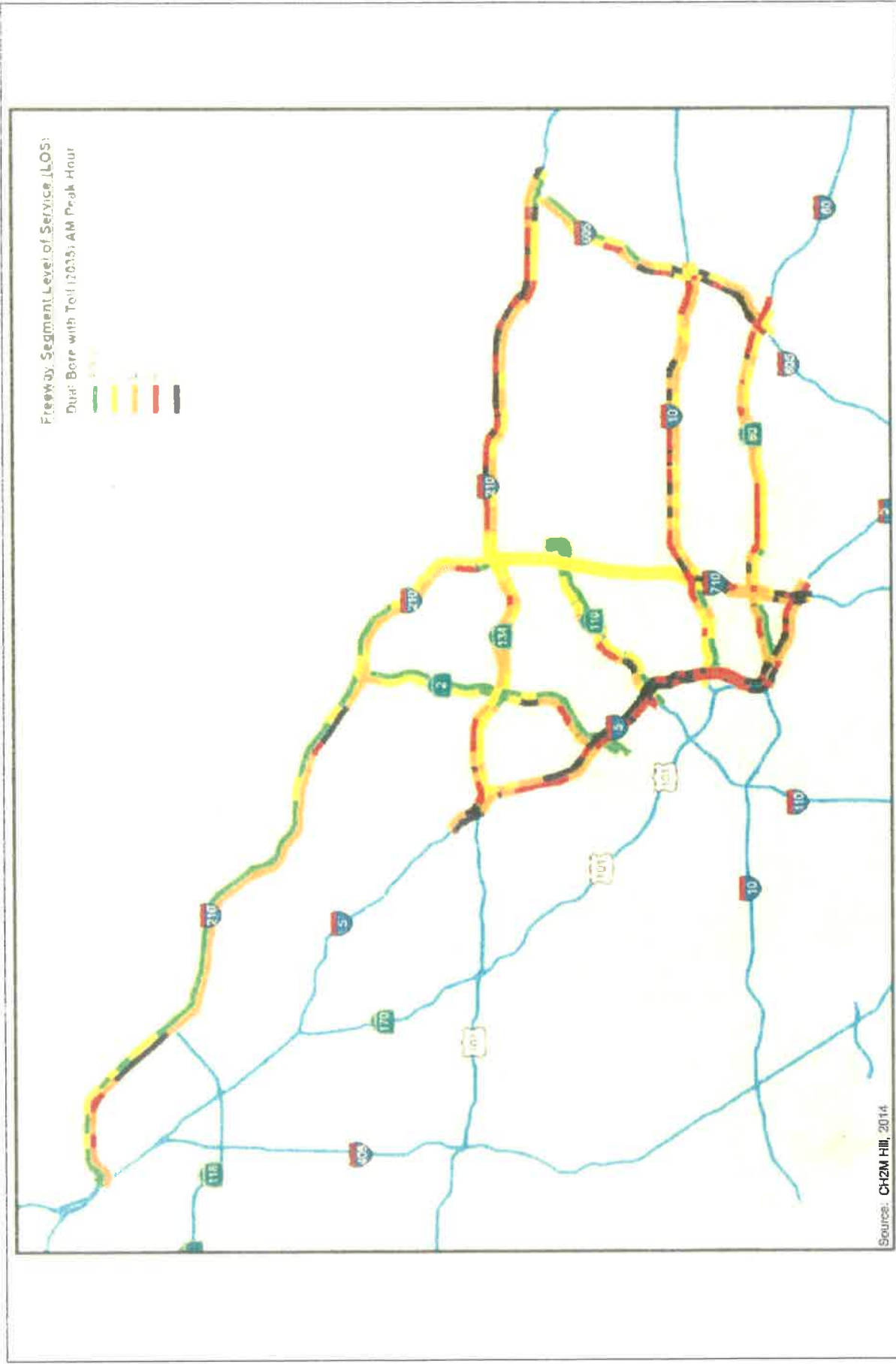
2035 AVERAGE DAILY TRAFFIC
TUNNEL VS TSM/TDM

FIGURE
8A



2035 TRUCK TRAFFIC
TUNNEL VS TSM/TDM

FIGURE
8B



2035 FREEWAY LOS -- AM PEAK HOUR -- TUNNEL

FIGURE
9A

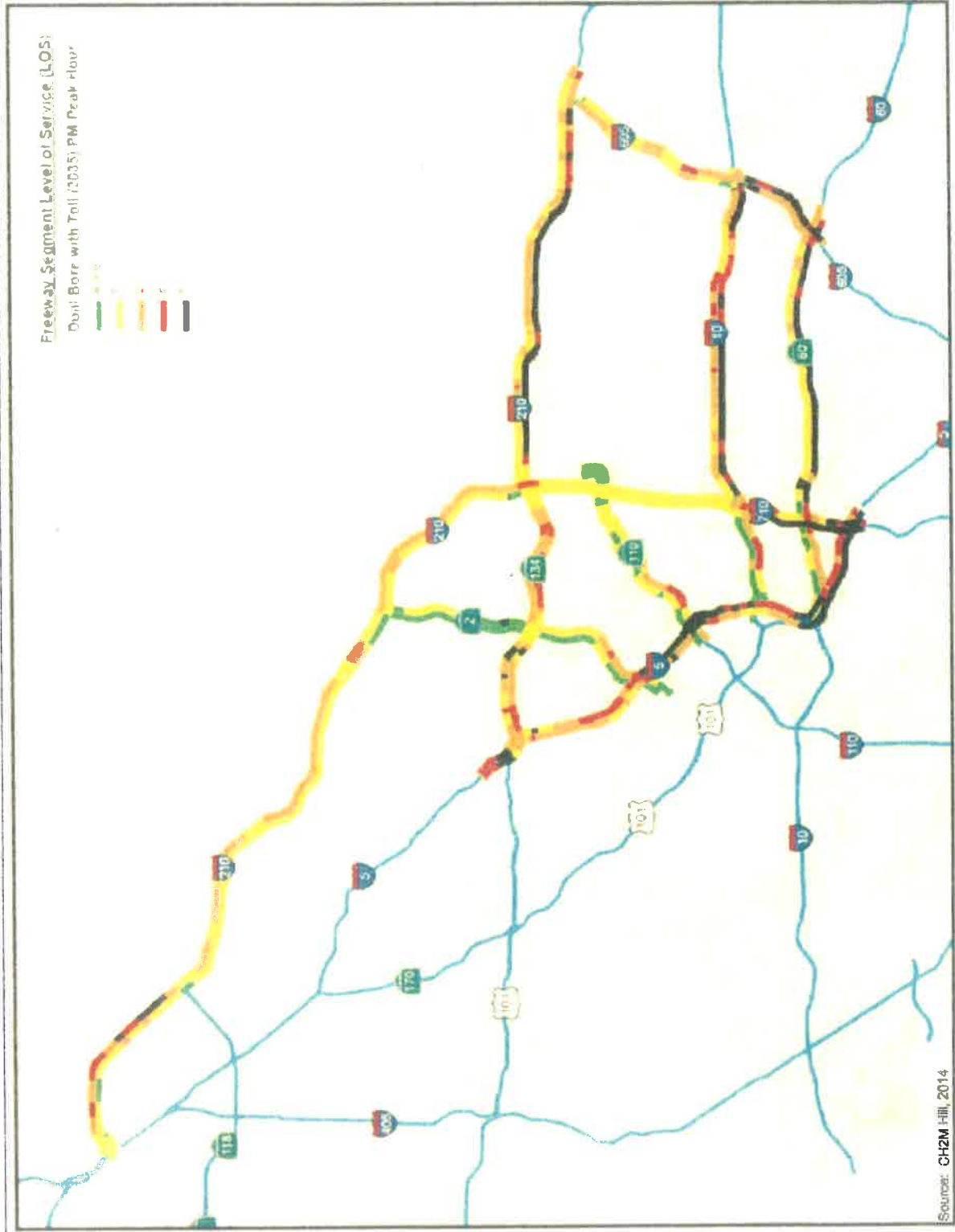


FIGURE
9B

2035 FREEWAY LOS -- PM PEAK HOUR -- TUNNEL

TABLE 2
HORIZON YEAR (2035) SYSTEM AND ROADWAY PERFORMANCE MEASURES BY ALTERNATIVE

Performance Measure	No Build		TSM/TDM		BRT		LRT		Tunnel	
	Value	%	Value	+ / -	%	Value	+ / -	%	Value	+ / -
Daily Traffic Volumes										
Arterials Crossing East-West Screenlines	881,000	1.02%	890,000	9,000	1.14%	890,000	9,000	1.02%	800,000	-81,000
Freeways Crossing East-West Screenlines	1,042,000	-0.29%	1,039,000	-3,000	-0.29%	1,039,000	-2,000	-0.19%	1,178,000	136,000
	1,923,000	0.31%	1,929,000	6,000	0.36%	1,930,000	7,000	0.36%	1,978,000	55,000
Traffic Diversion to Local Arterials										
Daily Study Area VMT on Arterials	8,180,000	0.00%	8,180,000	0	-0.12%	8,170,000	-10,000	0.49%	7,655,000	-525,000
										-6.42%

Notes:

Source: Table 4.5 from SR 710 North Study EIR/EIS, California Department of Transportation and Los Angeles County Metropolitan Transportation Authority, March 2014.

TABLE 3
HORIZON YEAR (2035) TRANSIT PERFORMANCE BY ALTERNATIVE

Performance Measure	No Build	TSM/TDM	BRT	LRT	Tunnel
New Transit Trips Change in Total Daily Linked Transit Trips in the SCAG Region	--	11,250	13,500	15,350	10,300
Transit Mode Share Study Area Mode Share	4.20%	4.20%	4.30%	4.30%	4.20%
North-South Transit Throughput Daily Person Trips by Transit Crossing East-West Screenline	209,000	211,000	215,000	214,000	212,000
Transit Accessibility Percent of Study Area Population and Employment within 0.25 Mile of High Frequency Service	80.60%	80.60%	80.60%	80.70%	80.60%

Notes:

Source: Table 4-10 from SR 710 North Study EIR/EIS, California Department of Transportation and Los Angeles County Metropolitan Transportation Authority, March 2014.

TABLE 4
PARKING LOSS SUMMARY

City	Weekday AM/PM Peak Period Parking Loss [a]				Permanent Parking Loss [b]			
	TSM/TDM	BRT	LRT	Dual Bore w/Toll	TSM/TDM	BRT	LRT	Dual Bore w/Toll
Los Angeles/Alhambra	0		0	0	135	-	0	0
Los Angeles	0	118	0	0	0	4	0	0
San Gabriel	0	0	0	0	18	0	0	0
San Marino	0	0	0	0	40	0	0	0
Monterey Park	0	417	0	0	0	23	0	0
Alhambra	26	28	0	0	2	16	0	0
South Pasadena	0	394	0	0	25	27	4	0
Pasadena	0	90	0	0	0	26	0	0
Total	26	1,047	0	0	220	96	4	0

Notes:

Source: Tables 6-2, 6-5, and 6-7 in SR 710 North Study EIR/EIS Transportation Technical Report, California Department of Transportation and Los Angeles County Metropolitan Transportation Authority, November 2014.

[a] Permanent parking loss during weekday AM and PM peak periods (estimated to be 7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM).

Parking will be available off-peak hours.

[b] Permanent parking loss due to final implementation of project. It has been assumed that this loss will not be restored after completion of project.

TABLE 5A
TRAFFIC VOLUMES OF SELECTED ARTERIAL AND FREEWAY SEGMENTS

Selected Facility	Start	End	No Build (2035)		TSM/TOM (2035)		LRT (2035)		ART (2035)		Dual Bore w/Tol (2035)	
			ADT	Truck ADT	ADT	Truck ADT	ADT	Truck ADT	ADT	Truck ADT	ADT	Truck ADT
Freeways												
SR 110	I-210/I-605 IC West	Rosemead Bl	295,814	38,555	294,679	38,502	296,000	38,299	294,664	38,461	288,219	36,100
	Rosemead Bl	San Gabriel Bl	335,922	39,350	334,241	39,290	335,189	39,068	334,090	39,252	325,990	36,307
	San Gabriel Bl	I-210/I-710 IC East	361,358	39,329	360,719	39,599	361,593	39,366	360,632	39,568	355,734	37,220
	I-210/I-710 IC East	I-210/I-710 IC Mid	263,492	32,591	263,374	32,587	264,836	32,408	263,531	32,552	268,334	32,791
	I-210/I-710 IC Mid	I-210/I-710 IC North	50,507	941	52,553	1,102	51,594	1,024	52,595	1,110	501,808	9,133
SR 2	I-210/I-710 IC North	Lincoln Av	170,308	20,388	172,426	20,331	171,474	20,377	172,266	20,505	205,505	26,318
	Lincoln Av	SR 2	152,521	20,231	151,900	20,199	153,074	20,183	153,295	20,277	189,675	25,939
	SR 2	La Graciana Bl	182,495	21,111	182,457	21,599	182,763	21,362	182,375	21,524	180,065	25,971
	I-210/SR 2	SR 2/SR 134 IC North	39,364	7,538	37,909	7,433	38,371	7,423	37,909	7,543	32,144	4,372
	SR 2/SR 134 IC North	SR 2/SR 134 IC South	190,492	13,717	189,176	13,639	190,027	13,543	189,367	13,594	168,397	4,412
SR 134	I-5/SR 2 IC South	I-5/SR 110 IC North	291,456	31,923	290,952	31,746	291,013	32,248	290,492	31,544	285,228	27,500
	I-5/SR 110 IC North	I-5/I-10 IC North	306,829	34,894	306,069	34,444	306,452	34,331	306,050	34,116	291,240	28,548
	I-5/I-10 IC North	E Cesar Chavez Av	290,538	27,172	289,925	28,562	290,731	28,153	290,739	27,542	289,392	29,601
	SR 134/I-210/SR 710 IC	N Figueroa St	285,947	21,157	286,554	21,174	287,092	20,954	286,768	21,094	291,750	22,872
	N Figueroa St	SR 124/SR 2 IC East	288,237	21,188	287,568	21,140	289,538	20,911	288,055	21,047	293,331	22,765
SR 710	SR 710/I-210 IC Mid	SR 710/I-210 IC South	59,597	941	52,553	1,102	51,594	1,024	52,595	1,110	501,808	9,133
	SR 710 North Portal	SR 710 South Portal	61,191	2,715	100,798	3,473	84,213	2,356	109,740	3,485	154,140	3,206
	SR 710 South Portal	SR 710/I-10 IC North	166,381	13,775	174,494	13,214	167,004	12,494	173,758	13,456	195,252	14,768
	SR 710/I-10 IC North	SR 710/SR 60 IC	111,759	22,303	111,385	20,659	109,157	21,292	112,390	21,491	106,747	15,515
	I-10/I-5 IC East	I-10/I-710 IC West	240,281	13,376	238,512	13,002	236,159	13,116	238,114	13,267	235,516	12,690
I-605	I-10/I-710 IC East	Rosemead Bl	202,294	15,822	200,355	15,871	208,287	15,861	200,318	15,865	208,455	15,903
	Rosemead Bl	I-605/I-605 IC West	256,382	14,872	252,092	14,365	250,355	14,155	257,067	14,926	260,709	14,903
	I-605/I-210 IC South	Los Angeles St	153,766	24,114	152,799	24,170	153,420	23,470	153,270	24,221	148,671	22,552
	Los Angeles St	I-605/I-10 IC North	185,238	25,252	184,123	25,343	185,460	26,033	184,640	26,395	180,360	24,757
	Greenway St	S Avenue 52	101,433	0	100,861	0	101,470	0	100,711	0	94,806	0
Arterials	Colorado Bl	Verdugo Rd	16,094	263	26,263	270	26,446	283	26,146	283	24,955	335
	N Figueroa St	N Lake Av	10,345	156	10,149	151	10,339	154	10,131	154	12,395	196
	N Lake Av	N Hill Av	3,792	11	3,592	0	3,012	0	3,016	0	5,543	0
	N Hill Av	San Gabriel Bl	10,766	76	10,045	64	10,011	23	10,701	95	10,060	25
	San Gabriel Bl	Rosemead Bl	9,627	64	9,355	55	9,366	73	9,364	68	6,330	46
Huntington Dr	Rosemead Bl	Huntington Dr	16,281	189	13,353	177	16,353	195	13,764	277	12,463	137
	Centennial Dr	Santa Anita Av	21,660	391	21,531	387	21,364	397	21,514	385	20,749	379
	Santa Anita Av	Rosemead Bl	40,765	833	41,577	813	41,858	854	41,675	813	41,316	759
	Rosemead Bl	San Gabriel Bl	50,374	1,174	51,820	1,214	52,557	1,255	52,792	1,230	53,318	1,128
	San Gabriel Bl	Garfield Av	55,824	740	59,541	766	54,894	780	59,661	783	56,224	691
N Broadway	Garfield Av	Frontier Av	49,744	866	48,400	891	49,266	910	48,603	899	46,139	791
	Frontier Av	Eastern Av	59,511	1,124	59,929	1,264	58,470	1,107	59,954	1,203	47,418	685
	Eastern Av	N Mission Rd	42,635	737	41,444	724	42,087	690	42,087	693	37,050	577
	Huntington Dr/N Mission Rd	Avenue 20 San Fernando Rd	40,930	849	39,179	844	40,531	867	39,546	827	38,684	825
	Peck Rd	Santa Anita Av	26,377	1,107	35,710	1,061	36,677	1,079	36,676	1,100	36,215	1,078
Las Tunas Dr	Peck Rd	Santa Anita Av	24,126	461	23,112	363	24,158	399	23,813	351	23,595	360
	Santa Anita Av	Rosemead Bl	18,918	272	18,502	237	18,855	273	18,512	233	18,511	326
	Rosemead Bl	Garfield Av	24,440	271	23,945	243	24,011	271	23,277	241	23,027	239
	Garfield Av	Palin Av	21,591	222	21,704	237	21,566	273	21,565	253	19,126	171
	Palin Av	Huntington Dr	23,341	414	24,289	499	23,174	449	24,322	498	17,283	287
Valley Bl	I-605	Santa Anita Av	40,305	622	40,156	625	40,571	619	40,131	617	39,976	617
	Santa Anita Av	Rosemead Bl	32,294	456	30,252	331	30,723	356	30,777	350	29,830	379
	Rosemead Bl	San Gabriel Bl	27,019	210	27,750	249	28,299	255	27,765	250	27,903	360
	San Gabriel Bl	Garfield Av	20,725	133	20,717	137	20,595	133	20,684	139	21,414	135
	Garfield Av	Atlantic Bl	11,573	89	11,128	82	11,755	81	11,130	81	11,558	95
SR 710 Ramps	Atlantic Bl	Frontier Av	13,635	179	12,473	174	13,339	171	12,592	132	12,535	155
	Frontier Av	SR 710 Ramps	52,242	1,377	50,783	1,487	56,995	1,377	50,258	1,496	51,731	288
	SR 710 Ramps	N Mission Rd	16,497	559	8,317	293	16,191	514	8,503	299	3,097	114
	I-210	I-210	13,369	364	13,736	268	15,645	258	15,739	261	15,158	286
	I-210	Live Oak Av	32,664	737	32,395	722	32,368	736	32,363	735	33,888	689
Peck Rd	Live Oak Av	Valley Bl	28,328	955	27,739	944	27,781	961	27,727	953	25,737	136
	Valley Bl	Garvey Av	11,343	485	41,080	477	41,340	483	41,062	478	41,156	495
	Santa Anita Av	Colorado Bl	26,373	461	26,133	450	26,435	443	26,154	436	24,262	350
	Colorado Bl	Las Tunas Dr	29,317	506	28,952	491	29,108	491	28,333	480	27,889	423
	Las Tunas Dr	Valley Bl	42,010	1,415	40,793	1,277	40,271	1,370	40,827	1,381	39,030	1,360
Rosemead Bl	Valley Bl	Garvey Av	34,413	514	34,592	519	34,698	504	34,601	511	31,506	454
	Orange Grove Bl	Huntington Dr	35,803	730	36,314	744	36,592	758	36,182	761	31,568	516
	Huntington Dr	Las Tunas Dr	45,415	839	51,536	943	51,007	956	51,603	951	46,681	448
	Las Tunas Dr	Valley Bl	48,929	1,422	47,728	1,503	47,728	1,552	47,449	1,512	45,135	1,513
	Valley Bl	Garvey Av	12,512	378	12,472	363	12,437	379	12,487	384	12,414	450
San Gabriel Bl	Huntington Dr	Las Tunas Dr	45,013	731	44,245	736	44,507	732	44,246	763	40,236	302
	Las Tunas Dr	Valley Bl	11,267	614	29,836	609	40,264	628	29,864	625	35,822	375
	Valley Bl	Garvey Av	29,943	628	18,451	601	38,918	623	38,249	633	36,383	557
	Garvey Av	Huntington Dr	50,245	1,431	53,947	1,511	57,308	1,520	57,388	1,549	57,953	1,551
	Huntington Dr	Garfield Av	25,638	555	29,245	650	29,435	582	29,504	581	23,619	401
Garfield Av	Garfield Av	Coltonia St	13,052	408	15,325	350	24,947	447	25,271	452	18,151	143
	Frontier Av	Huntington Dr	12,423	37	13,246	34	12,112	30	13,423	32	12,291	18
	Huntington Dr	W Main St	17,543	417	17,719	444	17,824	451	17,742	473	17,950	372
	W Main St	Valley Bl	43,333	441	43,113	467	44,206	464	43,134	445	39,430	404
	Huntington Dr	Main St	15,633	358	47,236	438	36,475	720	47,433	740	26,940	522
N Atlantic Bl	Main St	Valley Bl	13,439	217	11,976	319	23,156	965	52,469	369	17,914	311
	Valley Bl	I-10	30,915	109	30,189	110	32,977	923	30,449	878	30,726	895
	I-10	SR 60	40,267	548	19,862	539	40,211	556	38,751	554	40,368	533
	SR 60	Whittier Bl	41,565	307	11,128	413	11,800	395	11,460	421	12,115	363
	Colorado Bl	Greenway St	55,373	322	55,050	319	54,419	317	54,333	308	47,466	483
S Los Robles	Greenway St	Huntington Dr	28,199	206	18,472	211	18,234	231	18,405	235	15,771	167
	Colorado Bl	Cipriani Av	26,795	382	27,183	354	27,371	411	27,194	382	25,369	302
	Cipriani Av	N Figueroa St	23,007	166	23,131	187	22,996	144	23,440	163	18,451	405
	N Figueroa St	HS	26,010	1,120	23,513	1,029	25,957	1,057	25,465	1,030	23,956	501
	HS	N Figueroa St	18,360	125	18,730	141	18,773	141	18,761	140	18,737	147
N Mission Rd	N Mission Rd	Mission Rd	21,202	36	20,923	37	21,088	38	20,151	395	19,709	123
	Rosemont Av	SR 2	16,181	509	16,392	109	16,409	109	16,284	108	17,268	171
	SR 2	Angeleno Creek Hwy	10,394	62	10,255	62	10,437	62	10,3,21			

TABLE 3B
TRAFFIC VOLUME COMPARISON OF TUNNEL ALTERNATIVE VERSUS THE BUILD ALTERNATIVES

Selected Facility	Start	End	Dual Bore w/Toll (2035)		vs. TSM/TDM (2035)		vs. LRT (2035)		vs. BRT (2035)	
			ADT	Truck ADT	% Δ ADT	% Δ Truck ADT	% Δ ADT	% Δ Truck ADT	% Δ ADT	% Δ Truck ADT
Freeways										
I-210	I-210/I-605 IC West	Rosemead Bl	289,210	36,100	2.2%	-6.2%	-2.6%	-5.7%	-2.2%	-6.1%
	Rosemead Bl	San Gabriel Bl	325,990	35,307	2.5%	-6.3%	-2.8%	-5.8%	-2.4%	-6.2%
	San Gabriel Bl	I-210/I-710 IC East	355,734	37,220	1.4%	-6.0%	-1.6%	-5.5%	-1.4%	-5.9%
	I-210/I-710 IC East	I-210/I-710 IC Mid	268,434	21,791	2.1%	3.5%	1.5%	2.8%	2.0%	3.4%
	I-210/I-710 IC Mid	I-210/I-710 IC North	101,308	9,233	93.1%	737.8%	97.3%	801.7%	93.6%	725.1%
	I-210/I-710 IC North	Lincoln Av	205,305	26,313	19.4%	28.2%	20.1%	29.2%	19.5%	28.3%
	Lincoln Av	SR 2	189,575	25,939	16.4%	27.8%	16.3%	26.5%	16.2%	27.9%
	SR 2	La Crescenta Bl	180,065	25,971	10.8%	20.2%	10.6%	21.6%	10.9%	20.1%
	SR 2	I-210/SR 2	SR 2/SR 134 IC North	31,144	4,373	-17.1%	-41.2%	-17.3%	-46.8%	-17.1%
SR 2	SR 2/SR 134 IC South	SR 2/I-5 IC North	163,197	8,932	-11.0%	-34.3%	-11.4%	-41.5%	-10.9%	-34.8%
	I-5/SR 2 IC South	I-5/SR 110 IC North	285,228	27,509	2.0%	-13.1%	2.0%	-14.7%	1.9%	-12.8%
	I-5/SR 110 IC South	I-5/I-10 IC North	203,140	29,349	-4.2%	-14.2%	-4.3%	-15.2%	-4.1%	-13.4%
	I-5/I-10 IC South	S Cesar Chavez Av	289,192	29,604	0.2%	3.9%	0.3%	5.1%	0.5%	7.5%
SR 134	SR 134/I-210/SR 710 IC	N Figueroa St	191,750	22,672	1.4%	7.1%	1.3%	8.2%	1.5%	7.5%
	N Figueroa St	SR 134/SR 2 IC East	293,331	22,765	1.9%	7.7%	1.3%	8.5%	1.8%	8.2%
SR 710	SR 710/I-210 IC Mid	SR 710/I-210 IC South	101,408	9,233	93.1%	737.8%	97.3%	801.7%	93.2%	725.1%
	SR 710 South Portal	SR 710/I-10 IC North	194,140	14,249	92.6%	310.3%	90.2%	302.2%	95.6%	308.7%
	SR 710/I-10 IC South	SR 710/SR 60 IC	195,251	14,768	11.9%	19.3%	16.3%	14.4%	12.4%	9.4%
I-10	I-10/I-5 IC East	I-10/I-710 IC West	366,747	15,518	1.2%	-24.3%	0.8%	-27.1%	1.9%	-27.5%
	I-10/I-710 IC West	I-10/I-710 IC East	235,516	12,690	1.3%	2.4%	0.4%	3.1%	-1.1%	4.3%
	I-10/I-710 IC East	Rosemead Bl	205,159	15,903	1.3%	0.2%	1.2%	0.3%	1.2%	0.2%
	Rosemead Bl	I-10/I-605 IC West	260,709	14,303	1.4%	-0.4%	1.1%	0.3%	1.4%	-0.2%
I-605	I-605/I-210 IC South	Los Angeles St	148,575	22,552	-2.7%	-6.7%	-3.3%	-5.5%	-3.0%	-6.3%
	Los Angeles St	I-605/I-10 IC North	150,360	24,757	2.2%	-6.0%	-2.7%	-4.9%	-2.4%	-6.2%
SR 110	Glenarm St	S Avenue 52	94,206	0	-6.0%	0.0%	-6.0%	0.0%	-5.9%	0.0%
	S Avenue 52	SR 110/I-5 IC North	147,350	3	-4.2%	0.0%	-3.8%	0.0%	-4.2%	0.0%
Arterials										
Colorado Bl	Yardugo Rd	N Figueroa St	26,953	335	10.3%	24.1%	9.3%	18.4%	10.3%	18.8%
	N Figueroa St	N Lake Av	12,395	136	19.8%	23.2%	17.6%	20.8%	19.5%	25.7%
	N Lake Av	N Hill Av	5,632	7	-23.1%	0.0%	-25.9%	0.0%	-25.0%	0.0%
	N Hill Av	San Gabriel Bl	4,050	46	-24.3%	-28.1%	-26.1%	-37.0%	-24.7%	-36.3%
	San Gabriel Bl	Rosemead Bl	6,330	46	-32.3%	-29.2%	-34.6%	-41.8%	-32.4%	-32.6%
	Rosemead Bl	Huntington Dr	12,363	112	-18.8%	-36.7%	-21.3%	-42.6%	-18.4%	-36.7%
Huntington Dr	Crestfield Dr	Santa Anita Av	10,749	375	-3.6%	2.1%	-5.1%	4.5%	-1.7%	1.6%
	Santa Anita Av	Rosemead Bl	11,316	705	-0.9%	-13.3%	1.3%	-12.4%	-0.9%	-13.3%
	Rosemead Bl	San Gabriel Bl	53,812	1,128	1.9%	-7.1%	2.4%	-12.2%	1.9%	-8.3%
	San Gabriel Bl	Garfield Av	56,724	591	-5.6%	-9.8%	-4.5%	-11.8%	-5.8%	-12.7%
	Garfield Av	Fremont Av	46,139	793	-4.7%	-11.0%	-6.3%	-12.8%	-6.1%	-12.8%
	Fremont Av	Eastern Av	47,412	383	-20.5%	-15.7%	-19.5%	-26.1%	-20.5%	-26.4%
	Eastern Av	N Mission Rd	37,350	638	-9.5%	-11.3%	-10.7%	-14.2%	-10.1%	-7.9%
	Huntington Dr/N Mission Rd	Avenue 20 San Fernando Rd	38,884	425	1.8%	-4.3%	-4.7%	-9.0%	2.2%	-0.5%
S Live Oak Av	Commerce Dr	Peck Rd	36,216	1,078	1.3%	1.0%	2.1%	-0.1%	1.3%	1.0%
	Peck Rd	Santa Anita Av	23,556	360	-1.5%	0.8%	-3.4%	-9.6%	-1.5%	-0.3%
Las Tunas Dr	Santa Anita Av	Rosemead Bl	18,611	226	0.6%	-4.6%	1.3%	-17.8%	0.5%	-9.0%
	Rosemead Bl	Garfield Av	33,628	239	1.3%	1.6%	-1.9%	-11.8%	1.3%	-0.8%
	Garfield Av	Palm Av	18,126	171	-16.5%	-27.8%	-16.1%	-23.1%	-15.9%	-32.4%
	Palm Av	Huntington Dr	17,285	267	-28.8%	-46.5%	-25.7%	-39.1%	-29.8%	-46.5%
Valley Bl	I-605	Santa Anita Av	39,975	617	0.4%	1.3%	1.7%	-0.3%	0.4%	0.7%
	Santa Anita Av	Rosemead Bl	29,830	379	-1.4%	3.1%	2.9%	-4.3%	1.5%	-1.5%
	Rosemead Bl	San Gabriel Bl	27,903	280	0.6%	12.4%	1.4%	9.8%	0.5%	12.0%
	San Gabriel Bl	Garfield Av	21,418	156	3.4%	0.7%	4.0%	2.3%	3.5%	7.2%
	Garfield Av	Atlantic Bl	13,559	109	19.7%	32.9%	14.9%	32.9%	19.7%	34.4%
	Atlantic Bl	Fremont Av	15,935	115	27.8%	-7.3%	19.5%	-32.7%	26.5%	-12.8%
	Fremont Av	SR 710 Ramps	31,931	983	-37.1%	-33.6%	-43.1%	-67.4%	-37.3%	-38.3%
	SR 710 Ramps	N Mission Rd	7,097	114	9.4%	-61.1%	-43.8%	-78.7%	7.0%	-61.8%
Myrtle Av	Colorado Bl	I-210	15,158	286	2.4%	8.7%	-1.8%	10.9%	-2.8%	8.7%
	I-210	Live Oak Av	40,838	689	4.7%	-7.1%	4.6%	-6.4%	4.6%	-6.2%
Peck Rd	Live Oak Av	Valley Bl	25,777	435	-7.2%	-13.5%	-7.4%	-13.0%	-7.2%	-14.0%
	Valley Bl	Garvey Av	11,168	495	0.2%	3.8%	-0.1%	1.2%	0.3%	3.9%
Santa Anita Av	Colorado Bl	Las Tunas Dr	24,162	150	-6.8%	-22.2%	-7.6%	-21.0%	-6.9%	-19.1%
	Las Tunas Dr	Valley Bl	37,389	421	3.7%	-13.9%	-4.2%	-13.8%	-3.6%	-10.9%
	Valley Bl	Garvey Av	39,030	1,360	-4.3%	-1.2%	3.1%	-0.7%	-4.4%	-1.5%
Rosemead Bl	Orange Grove Bl	Huntington Dr	31,505	354	-8.9%	-12.5%	-9.2%	-9.3%	-8.9%	-11.5%
	Huntington Dr	Las Tunas Dr	31,508	616	-13.1%	-17.2%	-15.7%	-18.7%	-13.2%	-18.1%
	Las Tunas Dr	Valley Bl	46,331	848	-9.4%	-10.1%	-10.1%	-11.3%	-9.3%	-10.3%
	Valley Bl	Garvey Av	68,135	1,513	-5.9%	0.3%	6.3%	-2.5%	-6.0%	0.1%
San Gabriel Bl	I-210	Huntington Dr	37,824	550	-14.3%	-24.7%	-14.2%	-26.1%	-14.4%	-27.1%
	Huntington Dr	Las Tunas Dr	40,186	602	-9.2%	-18.2%	-9.7%	-19.9%	-9.2%	-21.1%
	Las Tunas Dr	Valley Bl	16,422	375	-8.1%	-21.2%	-9.8%	-25.5%	-8.2%	-25.1%
	Valley Bl	Garvey Av	36,383	557	-5.4%	-7.1%	-6.5%	-10.6%	-5.5%	-12.0%
Fremont Av	Valley Bl	Huntington Dr	37,358	1,251	-28.4%	-17.4%	-28.3%	-28.8%	-28.4%	-21.3%
	Huntington Dr	Garfield Av	23,519	403	-21.2%	-38.0%	-19.8%	-40.9%	-21.8%	-39.0%
	Garfield Av	Columbia St	18,161	345	-28.3%	-45.6%	-27.2%	-47.0%	-28.1%	-47.4%
Garfield Av	Fremont Av	Huntington Dr	12,191	11	-5.7%	-97.1%	2.3%	-40.0%	-6.9%	-45.5%
	W Main St	Valley Bl	42,350	372	-10.0%	-16.2%	-10.2%	-17.9%	-10.0%	-21.4%
N Atlantic Bl	W Main St	Valley Bl	19,530	804	-8.2%	0.2%	-9.3%	-11.5%	-7.9%	8.3%
	Huntington Dr	Main St	16,348	522	-21.8%	-24.1%	-20.5%	-27.5%	-22.4%	-29.5%
	Main St	Valley Bl	47,915	812	-7.8%	0.9%	-10.0%	-15.1%	-8.7%	-6.5%
	Valley Bl	I-10	50,728	895	1.1%	10.8%	4.2%	3.0%	0.4%	4.3%
I-10	SR 60	SR 60	40,363	632	1.3%	17.4%	0.4%	13.8%	4.2%	18.3%
	SR 60	Whittier Bl	42,121	889	2.4%	6.2%	1.3%	8.0%	1.6%	4.3%
	S Arroyo Pkwy	Colorado Bl	47,466	193	-13.8%	-31.4%	-12.8%	-32.4%	-13.6%	-37.8%
S Los Robles	Corson St	Huntington Dr	15,721	167	-14.6%	-20.9%	-14.3%	-27.7%	-14.3%	-29.2%
	Colorado Bl	Cypress Av	25,360	302	-7.0%	-14.7%	-7.3%	-26.5%	-6.7%	-20.3%
Eagle Rock Bl	N Figueroa St	Eagle Rock Bl	19,451	405	-17.0%	-7.3%	-15.4%	-25.5%	-17.0%	-13.6%
N Figueroa	York Bl	I-5	23,956	301	-6.2%	-22.2%	-7.7%	-24.2%	-5.9%	-22.2%
York Bl	Eagle Rock Bl	N Figueroa St	18,767	147	0.7%	4.3%	0.0%	4.3%	0.0%	3.0%
N Mission Rd	Huntington Dr	Marrero St	19,709	433	1.8%	0.9%	-6.5%	-6.7%	-2.1%	9.8%
	Rosemont Av	SR 2	17,263	112	5.3%	2.3%	5.4%	2.3%	6.0%	3.7%
Foothill Bl	SR 2	Angeles Crest Hwy	13,251	76	27.5%	22.6%	27.5%	22.6%	27.6%	22.6%
	Angeles Crest Hwy	Oak Grove Dr	11,215	106	43.0%	37.7%	44.4%	34.2%	43.2%	27.7%
	SR 2	Angeles Forest Hwy	23,945	1,972	0.7%	3.7%	0.8%	3.1%	0.8%	3.0%