Hon. Anthony J. Portantino
State Assemblymember Ret.

Tab 74

June 23, 2015

Ms. Lucetta Dunn
Chair
California Transportation Commission

RE: Agenda Item 74 Via: E-mail to ED Kempton for Board Distribution

Dear Chair Dunn,

First let me compliment Executive Director Kempton for his forceful request to MTA to produce the Cost Benefit Analysis (CBA) for the proposed 710 tunnel. His efforts have resulted in the CBA being released last Friday afternoon. I also understand that CTC Staff is recommending to the CTC to not comment on the DEIR for the 710 until it is certified. I do feel that there are two issues contained within the CBA and the DEIR that warrant strong comment, oversight and intervention from the CTC.

1) The CBA and the DEIR are both purposely underestimating the cost of the proposed tunnel by half. Similar projects, most notably the Sepulveda Pass, are using $1 billion per mile as a budgeting model, yet the 710 DEIR and CBA are using $500 million. It has long been postulated that if the 710 project costs increases beyond $6 billion it becomes too difficult to finance. By cutting the funding model in half the project continues to have inertia and finding a benefit becomes easier. Frankly, there is no credible evidence to support $500 million per mile when experience and current projects underway are using twice that.
2) The CBA and DEIR have no provision, plan or budget for the anticipated breakdown of the tunnel boring machine. The same machine has been stuck in Seattle for over a year and is requiring a four city block additional, vertical tunnel to be excavated in order to free it. I have expressed this issue directly to MTA and have been told directly that "***it's not MTA's job to plan for what ifs.***" Again, this defies all logic as we should be using experience to help us to improve the process. If we know the boring machine gets stuck, shouldn't there be a plan or contingency proposed to deal with it? In Seattle, the equivalent of four blocks will be taken out, shouldn't the residents above or adjacent be informed that the machine might get stuck? Shouldn't there be a budget factor included in the CBA to cover the cost of acquiring the land, excavating the four block tunnel and the significant construction cost incurred? Yet, none of this is included anywhere within the CBA or the DEIR.

In short, the CTC should inquire as to what justification is being made for cutting the cost per mile in half from the Sepulveda Pass and why there is no plan for the breakdown of the boring machine when we know that there is a real possibility it gets stuck.

I respectfully submit that these two issues are well within the purview of the CTC. I would go even further to state that the CTC has the moral and ethical responsibility to demand justification on both issues. It is important to note that within the CTC's mission it says to have "**active participation**" in the state's transportation "**financial stability**." The request above meets that mission.

Cordially,

Anthony J. Portantino

Anthony J. Portantino

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CITY OF SOUTH PASADENA

OFFICE OF THE MAYOR
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7210 ▪ FAX: 626.403.7211
WWW.SOUTHPASADENACA.GOV

PINK SUPPLEMENTAL ITEM

June 24, 2015

California Transportation Commission
1120 North Street, MS-52
Sacramento, CA 95814

RE: Submittal of Notice for Availability for Comments: 07-LA-710, PM 26.7/32.1T SR 710 North Study

Dear Honorable Chair and Members of the California Transportation Commission,

The City of South Pasadena (City) is pleased to support the California Transportation Commission (CTC) staff recommendation that the CTC make no comments regarding the environmental issues addressed in the State Route 710 (SR-710) North Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). Taking a position on the Draft EIR/EIS would be premature as Metro and Caltrans have not selected a Preferred Alternative. Furthermore, the Draft EIR/EIS's includes numerous deficiencies that misinform decision makers about the true environmental impacts of each alternative and presents transportation modeling results that are inconsistent.

Indeed, we hope that each member of the CTC will take a moment to review the new Beyond the 710 proposal, which was announced on May 28, 2015, at a press conference covered by every major Los Angeles media outlet. The proposal can be found at http://www.beyondthe710.org/better_alternatives.

In addition, the Cost Benefit Analysis (CBA) provides a disconcertingly skewed analysis that includes underestimated costs for the Tunnel Alternative and provides misleading conclusions. The use of Net Present Value to depict the summary results of the CBA seemingly indicates that the Single Bore variation of the Tunnel Alternative would be the best investment and the Light Rail Alternative would be the poorest. However, if a Benefit-Cost Ratio was utilized, the Transportation System Management/Transportation Demand Management Alternative would be a far superior investment. In addition, the Residual Value calculations in the CBA refer to the remaining useful life of the project rather than the estimated value of future benefits. This is inconsistent with the principals of the Net Present Value analysis and further skews the benefits in favor of the project with the highest cost.

The CBA's estimate for Employment Benefits utilize European guidance and is directly correlated to the capital expenditures of each alternative. This oversimplified appraisal misleadingly indicates that the

alternative with the highest project cost would generate the highest number of jobs. However, the Draft EIR/EIS states the Light Rail Alternative would result in the highest number of permanent jobs of all of the build alternatives.

The CBA Traffic Analysis includes estimates for Value of Time. However, the sensitivity analysis includes a note revealing that "A different value of time (VOT) featuring different VOTs for auto and transit users was applied $22.57 for auto and $6.35 for transit (2014 prices) - instead of the Cal-B/C assumptions ($13.25 for both auto and transit)." There is no explanation as to why different VOTs are used in the analysis or why there it is assumed that the VOT for users of one mode is less valuable than another.

The misuse of Net Present Value and the use of incorrect assumptions raise significant doubt about the conclusions identified in the CBA. While CTC staff recommends not commenting on the Draft EIR/EIS, it is important to note that many of the assumptions used in the CBA were derived from the Draft EIR/EIS; and therefore requires further scrutiny.

As the anticipated financing authority for a potential Public Private Partnership, the City recommends that the CTC conduct a formal review of the CBA to truly understand the implications of the proposed Tunnel Alternative and fulfill the CTC's mission statement of "ensuring a safe, financially sustainable, world-class multimodal transportation system that reduces congestion, improves the environment, and facilitates economic development through the efficient movement of people and goods."

If you have any questions or comments, please feel free to contact Sergio Gonzalez, City Manager, at sgonzalez@southpasadenaca.gov or (626)423-7210.

Sincerely,

Robert S. Joe
Mayor, City of South Pasadena

cc: Connected Cities and Communities
5-Cities Alliance
South Pasadena City Council

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City Council
David A. Spence, Mayor
Jonathan C. Curtis, Mayor Pro Tem
Michael T. Davitt
Leonard Pieroni
Terry Walker

CITY OF LA CAÑADA FLINTRIDGE

June 24, 2015

California Transportation Commission
1120 North Street, MS-52
Sacramento, CA 95814

RE: Submittal of Notice for Availability for Comments: 07-LA-710, PM 26.7/32.1T DR-710 North Study

Dear Honorable Chair and members of the Commission:

The City of La Cañada Flintridge has reviewed the comment letter prepared and submitted by the City of South Pasadena, signed by Mayor Robert S. Joe, and dated June 24, 2015. The City of La Cañada Flintridge would like to add its concurrence and full support to the comments included, and concerns raised, within the South Pasadena letter.

We also recommend that the California Transportation Commission (CTC) take no action with respect to comments to the SR-710 North Study Draft Environmental Impact Report/Statement (DEIR/DEIS) for the reasons set forth in the South Pasadena letter and we encourage the CTC to truly assess the veracity and appropriateness of the methodology used in the Cost Benefit Analysis only just released this past week. We strongly believe that, while no preferred alternative has yet been identified within the DEIR/DEIS, the intention has been made very clear that the Tunnel alternative will become the foregone recommendation to the health and safety detriment of the many residents of our communities. Thank you for giving your serious attention to our concerns.

Should you have any questions, please feel free to contact me at MAlexander@lcf.ca.gov or (818) 790-8880.

Sincerely,

Mark R. Alexander
City Manager

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Dear Chair Dunn,

I am writing to you on behalf of the West Pasadena Residents' Association (WPRA), which represents 7,000 households in Pasadena. After carefully studying the Metro proposals, participating in Metro outreach sessions, talking with Metro representatives and area residents, the WPRA is convinced that the proposed freeway tunnels extending the 710 freeway are bad for both the San Gabriel Valley and Los Angeles County.

As we continue to review the SR-710 Study Draft EIR/EIS, it is increasingly clear that the tunnel alternative will have an alarming environmental impact to both our historic community at the north tunnel portal, and to other cities along the SR-710 route. Many impact analyses in the report, such as those for air quality and health, are grossly deficient. Other environmental impact analyses, such as tunnel vibration boring effects, have not been performed at all. Moreover, the report fails to consider the very possible scenario of a Tunnel boring Machine (TBM) failure. Failures of drilling equipment, flooding and collapses have plagued almost half of the world's large tunnel projects surveyed by the WPRA. The spectacular failure of the Seattle tunnels' TBM is a recent and real-world example of how TBM's can and do fail. Such a failure have would have severe environmental consequences to nearby communities and significantly increase project costs.

Adding to our concerns is the recent release of the SR-710 Cost Benefit Analysis, which continues to demonstrate Metro's bias for the freeway tunnel alternative. While we are still in the process of analyzing the report, a few of our concerns include the following: 1) The cost to build the tunnels are grossly underestimated based on comparable cost estimates for other large tunnel projects. 2) The cost to operate the tunnels are also significantly underestimated. The required surveyance crews and emergency services proposed in the Draft EIR/EIS are not consistent with best practices for recently built, long roadway tunnels that incorporate lessons learned from past tunnel disasters. 3) The cost to treat health conditions related to freeway pollution was not included at all. These health issues include asthma, lung disease and heart disease to name a few. 4) Safety costs only consider estimates for car crashes. Completely ignored are the costs related to pedestrian and cyclist safety, and the very real and long-term safety risks associated with putting a roadway in a very long tunnel. The 5-mile tunnels proposed by Metro do not have inspection stations, fire shelters or emergency access to the surface. Tunnel accidents and fires can be expected to occur and have the potential to result in a significant loss of human life.

We understand that the Cost Benefit Analysis is not part of the Draft EIR/EIS process and are very concerned that there is no process by which the public may respond to this report. Therefore we request that a process be established by which the public may provide input to the Cost Benefit Analysis and by which Caltrans/Metro may respond back to the public in an open dialogue.

Finally, we encourage you to support the growing community consensus that a multi-mode alternative is an excellent and environmentally responsive solution for meeting regional transportation needs. We endorse Pasadena's SR-710 Preferred Alternative that was unanimously approved by the Pasadena City Council on April 13, 2015, and we support the goals and efforts of the Beyond the 710 coalition. As the Draft EIR/EIS data shows, building

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another freeway does not relieve traffic, it just shifts traffic around at an enormous health, environmental and financial cost to taxpayers.

Sincerely,

Geoffrey Baum
President, West Pasadena Residents' Association

cc: Metro Board, Pasadena City Council, Assemblymember Chris Holden, Senator Carol Liu, Representative Adam Schiff

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Tab 74

Gloria Valladolid
P O 3071
Alhambra CA 91803

June 24, 2015

Will Kempton, Executive Director
California Transportation Commission
1120 N Street, Room 2221 (MS-52)
Sacto, CA 95814 Will.kempton@dot.ca.gov

Dear Mr Kempton and Commissioners

RE City of Alhambra Comment Letter vs Residents of Alhambra
The City of Alhambra has pushed the 710 tunnel on its citizens with their propaganda everywhere710 banners, expensive, disruptive "710 Celebration Days," and the monthly articles with no documentation of facts in the Chamber of Commerce controlled propaganda rag that pretends to be a newspaper, *Around Alhambra*. The Alhambra City Council spent $150,000 in 2014 when they twice closed Fremont to create unbearable gridlock. They also closed Fremont in 2013 and again in 2015 when they spent tens of thousands each time to again create gridlock for its citizens. Their incorrect messages are that the tunnel will eradicate the traffic congestion and provide "virgin" air (Messina). Clearly, the City Council does not have the welfare of its citizens in mind when pushing the 710. The City never publishes notices regarding issues that affect its citizenry in real newspapers read by the thinking public.

Consequently, at Monday's Council meeting when they "discussed" the 710 EIR Comment Letter from the city, we coincidentally only had one representative at the meeting to speak against the city's letter. I presented facts that demonstrate that the toll tunnel is a terrible idea for Alhambra because it does not do what our Council says; it does not improve congestion nor air quality in Alhambra.

My comments were directly from the EIR referring to the Air Quality Criteria Pollutants Table. That Table says the air quality is the same for every alternative, including the no build alternative. I also said the EIR shows air quality is determined by location and topography (EIR 3.13.2.1). Finally, I cited the EIR which says, freeway congestion gets worse on the 210 between the 710 and Glendale and the 2 and the 710 south of the 10. Consequently, the only traffic relief will be on the 605 because some commuters will shift to the 710 and take the tunnel instead because it will be more direct for their particular destinations. Clearly, the facts emphasize that the tunnel is not a good idea for Alhambra. Commissioners, please consider my comments as representing the people and not our City Council's position who is selling us off as we will continue to experience our local traffic congestion and suffer the health disbenefits of this supposed regional improvement. Subjecting a whole segment of the population to these insufferable conditions is criminal for a civilized society. Our City officials are not serving their constituents. Commissioners, please consider the people who live in Alhambra and the

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horribly negative consequences of having the toll tunnel. Do not support the tunnel construction.
Sincerely
Gloria Valladolid

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Please put the following in your public record and forward to the CTC Board ahead of your June 25 meeting:

Dear CTC:

The 710 connection is a highly volatile topic and given the 26,000 pages of D-EIR, and only this week the cost-benefit analysis came out, I can't see how that is enough time to formulate a position on which of Metro's options, if any, are best. Why can't there be several options, why only one?

My city council, spearheaded by Barbara Messina, has been pushing the 710 tunnel option as the ONLY option. For the last 3 years, they've hosted street fairs to promote it, which is suspect, since the D-EIR hadn't come out yet and they couldn't know the facts yet. Please don't be like my city council and prematurely jump on some decision that will affect the region significantly in terms of costs and construction, as well as dangers associated with the tunnel.

Please read:MTA's Project Accused of Tunnel Vision http://www.glendalenewspress.com/news/tsn-vsl-mtas-report-on-710-freeway-gap-project-accused-of-tunnel-vision-20150624,0,651960.story?track=rss

Seattle's Big Bertha tunnel is currently stalled and behind by 1.5 years, a change order request for an extra $293 million and the tunnel boring machine broke down. I direct you to this: "State Pulls Plug on Panel that was Monitoring Tunnel Project"http://www.seattletimes.com/seattle-news/transportation/state-pulls-plug-on-panel-that-was-monitoring-tunnel-project/?utm_source=twitter&utm_medium=social&utm_campaign=article_left

Please table any decision on what is best for the area since a)the D-EIR makes claims that only 2.5 min. will be shaved off of all commuters in the area b) it's unknown whether people will use the tunnel with the tolls (I won't - I'll continue on side streets to work since traffic isn't that bad), c) nowhere does it project how many actually would use the tunnel/whether it's convenient for them d) 60,000 more cars per day according to Metro will be diverted from the toll charging tunnel and get on the streets anyway - defeats the purpose. e) the tunnel scrubbers can't clean the fine particulate matter that causes cancer, f) Beyond 710 has proposed another alternative that merits through study/

We really need a more modern solution for Los Angeles' transportation needs. Car use has declined over the years in LA - metro ridership is up (despite rises in fares), and I would like to see a lightrail built there, that connects East LA College, Cal State LA and Pasadena City College. That in itself would take thousands of drivers off the streets.

Thank you.

Melissa Michelson
Alhambra

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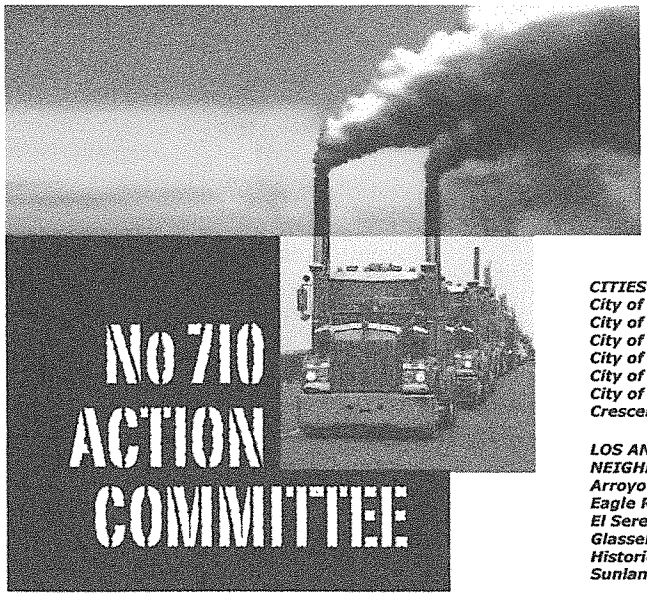

OPPOSITION GROUPS (PARTIAL LIST)
LA RED, El Sereno
Caltrans Tenants of the 710 Corridor
Glassell Park Improvement Association
Far North Glendale Homeowners Association
San Rafael Neighborhoods Association
West Pasadena Residents Association
Highland Park Heritage Trust
La Canada Unified School District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

CITIES
City of Glendale
City of La Canada Flintridge
City of Los Angeles
City of Pasadena
City of Sierra Madre
City of South Pasadena
Crescenta Valley Town Council

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

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

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

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

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ITEM

June 24, 2015

California Transportation Commission
1120 North Street, MS-52
Sacramento, CA 95814

RE: SR 710 North Study Cost Benefit Analysis and Cost Estimate for the tunnel alternative in SR 710 DEIR

Dear Honorable Chair and Members of the California Transportation Commission,

The No 710 Action Committee would like to comment on two aspects of agenda item 74 on the agenda for your June 25th meeting. As you are aware, Caltrans and LA County MTA promised both the CTC and the public that the Cost Benefit Analysis (CBA) for the SR 710 North Project would be released concurrently with the DEIR/EIS. We have been waiting since March 6th for its release. Over three months later, it was finally released on Friday, June 19th. The No 710 Action Committee appreciates the efforts of Mr. Kempton to have the CBA report released, to extend the public comment period long enough to provide the public time to study the report in conjunction with the DEIR/EIS, and his request that that Metro and Caltrans implement a formal process for submission of public comment on the CBA report that would insure that the public's comments on the CBA report are responded to.

The tool chosen for the analysis was the "California Life-Cycle Benefit/Cost Analysis Model (Cal-B/C0. In Section 2.1.2 "Background" and throughout the rest of the report, the model is repeatedly, and only, referred to as "The California Benefit/Cost (Cal-B/C) model" – designating a ratio of Benefit to Cost. This ratio was discussed by CH2MHill employee, Sam Seskin, during a presentation made to the project Technical Advisory Committee in May of 2014. (We have included a link to the slides from that presentation/discussion at the end of this document). However, no ratios were included in the report. Results were presented only as Net Present Value (NPV), the difference between the Present Value of Benefits and the Present Value of Costs for each alternative/variation. Conclusions based on this simple difference cannot be considered valid when the alternatives being compared have orders of magnitude differences in their cost and benefit values. In Section 2.6, the report makes the statement "The larger this number (NPV) is, the greater the net benefits that are delivered." Larger NPVs do equate to larger net benefits, but they don't necessarily equate to greater value per dollar spent. In fact it is mathematically impossible for an alternative such as TSM/TDM, whose costs and benefits are measured in the hundreds of millions of dollars, to have an NPV in the thousands of millions (billions). The statement in the report leads the reader to the wrong conclusion about the alternative that is the best value. This misrepresentation demonstrates the need for "normalization" of the results through use of the Benefit/Cost ratio.

To demonstrate this assertion, we have added Benefit/Cost ratios calculated for all alternatives from the Present Value of Costs and Present Value of Benefits Data to Table 3-1:

TABLE 3-1
Cost-Benefit Analysis Summary
SR-710 North Study Los Angeles County California

Alternative/Variation	Present Value of Costs ($ million)	Present Value of Benefits ($ million)	Net Present Value ($ million)	Benefit/Cost Ratio
TSM/TDM	255	599	344	2.35
Single Bore (Toll)	1,979	3,503	1,524	1.77
Single Bore (Toll, No Trucks)	1,951	3,429	1,478	1.76
Single Bore (Toll, Express Bus)	1,997	3,587	1,590	1.79
Dual Bore (No Toll)	3,273	3,348	75	1.05
Dual Bore (No Toll, No Trucks)	3,227	3,733	506	1.16
Dual Bore (Toll)	3,374	3,337	-37	0.99
BRT (ELA to Pasadena)	510	879	369	1.72
LRT (ELA to Pasadena)	2,163	1,293	-870	0.59

The table below ranks these alternatives from best to worst based on 2 criteria: in the first column is their ranking as it emerged from the CBA report based on NPV, and in the third column, their ranking based on Benefit/Cost ratio.

Alternative/Variation	NPV (largest to smallest) ($ million)	Alternative/Variation	Benefit/Cost Ratio (largest to smallest)
Single Bore (Toll, Express Bus)	1,590	TSM/TDM	2.35
Single Bore (Toll)	1,524	Single Bore (Toll, Express Bus)	1.79
Single Bore (Toll, No Trucks)	1,478	Single Bore (Toll)	1.77
Dual Bore (No Toll, No Trucks)	506	Single Bore (Toll, No Trucks)	1.76
BRT (ELA to Pasadena)	369	BRT (ELA to Pasadena)	1.72
TSM/TDM	344	Dual Bore (No Toll, No Trucks)	1.16
Dual Bore (No Toll)	75	Dual Bore (No Toll)	1.05
Dual Bore (Toll)	-37	Dual Bore (Toll)	0.99
LRT (ELA to Pasadena)	-870	LRT (ELA to Pasadena)	0.59

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Note that based on NPV, the Single Bore tunnel variations emerge from the CBA report as the best investment. However, when you examine the Cost/Benefit ratios, the TSM/TDM alternative, ranked sixth behind 4 tunnel variations and the BRT alternative based on NPV, jumps to first. In addition, the BRT alternative moved from fifth to fourth place, jumping ahead of the Dual Boreore (No Toll, No Trucks) tunnel variation. Although it is still behind the three Single Bore variations, numerically the ratios of these 4 alternatives are virtually the same, with a separation of only 0.07. The three Dual Bore variations are clustered together below the BRT alternative, and the ratios for these variations are separated from the first five alternatives/variations by a much greater margin. In both rankings the LRT alternative is last (worst).

These results demonstrate that the use of NPV instead of Benefit/Cost ratio obscures the return on investment, or "bang for the buck" and leads to a different conclusion from the study. Built into these calculations are incorrect assumptions about and use of employment benefits, residuals and discounts, omission of factors important to stakeholders (health impacts, reliability, resiliency, value of active transportation and economic productivity), flawed conclusions from the DEIR/DEIS and underestimates for the tunnel alternatives in both the CBA and the DEI/EIS.

It is the contention of the No 710 Action Committee that both the DEIR/EIS and the Cost Benefit Analysis use gross underestimates for the cost of the SR 710 dual bore tunnel alternative. The Los Angeles Metropolitan Transportation Authority currently has 2 roadway tunnel projects of the same size under consideration. One is the SR 710 dual bore tunnel option in the DEIR/EIS – two, 4.5-mile tunnels of 58' diameter. The second is a 9-mile tunnel, also 58' in diameter, being considered for the Sepulveda Pass Corridor Project. While Metro's reports claim to have used the per mile cost of Seattle's SR-99 Alaskan Way Viaduct Replacement Tunnel to estimate the costs for these two tunnels, the SR 710 tunnel cost estimate, $5.65 Billion in the DEIR/EIS, is inexplicably about one-half that for the Sepulveda Pass Corridor tunnel (without rail) of $10 Billion. While we have repeatedly asked for an explanation of this internal inconsistency, none has been provide, leading us to speculate that the cost estimate for the SR 710 tunnels has deliberately been misrepresented in order to make that alternative appear more favorable to the public as well as to potential private investors necessary for the tunnels to be constructed.

For these and many other reasons, our organization recommends that the CTC conducts its own careful review of the CBA report prior to exercising its role in making any decisions regarding approval of the SR 710 project. We appreciate the Commission's attention and diligence in this matter.

If you have any questions or comments, please don't hesitate to contact the No 710 Action Committee at 626-799-0044 or Jan SooHoo at the number listed below.

Sincerely,
Jan SooHoo
Representing the No 710 Action Committee
818-952-4103
jan@soohoos.org

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Links to relevant documents

Mr. Seskin's presentation (slides 37 – 40) is posted at:
http://media.metro.net/projects_studies/sr_710/images/tac_soac_powerpoint_051414.pdf)

The Cost Benefit Analysis Report can be found here:
http://media.metro.net/projects_studies/sr_710/images/attachmentb_sr710cbareport_2015-0619.pdf