

Date: July 15, 2018

To: Kelly Ewing-Toledo, Senior Environmental Planner, Heritage Resources Coordinator,
Caltrans District 7

References:

1. Email from Kelly Ewing-Toledo, 'SR-710 - North Study Draft Memorandum of Agreement (MOA)', June 28, 2018 at 3:28 PM.
2. 'West Pasadena Residents' Association (WPRA) Response to the SR-710 Draft Environmental Impact Report (DEIR) / Draft Environmental Impact Statement (DEIS), August 4, 2015.
3. 'WPRA Comments to the SR-710 North Study Findings of Adverse Effects (FOAE),' March 1, 2018.
4. 'WPRA Comments to the SR-710 North Study Focused Re-circulated Draft Environmental Impact Report (FRDEIR)/ Supplemental Draft Environmental Impact Statement (SDEIS)', July 2, 2018.

Subject: WPRA Comments to the SR-710 North Study Draft MOA dated June 28, 2018.

The WPRA appreciates the opportunity to review and comment on the Draft MOA for the SR-710 North Project that we received by email on June 28, 2018 (see Reference 1). The WPRA is an all-volunteer organization dedicated to maintaining and enhancing the character of Southwest Pasadena and the quality of life throughout Pasadena. We represent 7,000 households and have nearly 1,000 dues-paying members. The SR-710 Study Project will have a very large and permanent impact on our community. The purpose of this letter is to formally submit our comments to the MOA document.

After reviewing the MOA, we are very pleased to see that the authors, Caltrans and the State Historic Preservation Office (SHPO), have finally identified the Transportation System Mangement (TSM) / Transportation Demand Management (TDM) Alternative as the 'Preferred Alternative'. Unfortunately, we find that the absence of other language in this MOA continues to propogate an unclear project definition and does not provide environmental impact resolution for all project scenarios. Our concerns are identified below:

1. The SR-710 Project has never had a stable project defintion and, most recently, the Los Angeles' Metropolitan Transportation Authority (Metro) has changed the 'preferred alternative' language causing further confusion.

The SR-710 Project has been plagued by an unclear project definition from the start of the environmental impact process. Many concerns with the project definition were documented in the DEIR/DEIS responses, including those provided by the WPRA in Reference 2. Unfortunately, starting in the summer of 2017, the situation was made worse

when Metro introduced two definitions of a preferred alternative; namely they stated that the TSM/TDM was the 'Locally Preferred Alternative' and that the Single Bore Tunnel was the 'Technically Superior Alternative'. To our knowledge, this language choice is not recognized by the environmental impact process.

Unfortunately, this language has led many in the public to believe that there are two preferred alternatives, with the TSM/TDM being selected for immediate execution and the Single Bore Tunnel being selected for possible later execution, if and when funding is secured. This idea of a multi-phased project - executing both the TSM/TDM and the Single Bore Tunnel - has been suggested by Metro officials in public meetings. An example of this occurred at the July 17, 2017 Stakeholder Outreach Advisory Committee (SOAC) / Technical Advisory Committee (TAC) meeting. When asked by an attendee if Caltrans would give up the stubs once the TSM/TDM Alternative had been officially declared the 'locally preferred alternative', Abdullah Answare, a Senior Executive at Metro, said they'd take a look after 3 years and 'see how it goes'.

Recommendation: The MOA should add wording that the TSM/TDM is 'the project' and the only Preferred Alternative.

2. The tunnel environmental impact analyses are inadequate and should not be certified in the FEIR/FEIS; moreover, we believe that the tunnel alternatives are not feasible under Section 4f of the Department of Transportation Act of 1966.

The impacts to historic resources has been presented in the DEIR/DEIS, the FOAE, and the FRDEIR/SDEIS. The WPRA has carefully reviewed and commented on all of these documents (See Reference 2, 3, and 4). Unfortunately, the historic impact assessments in these documents are completely inadequate. Key areas of analyses that were deficient include the following: failure to address boring machine breakdowns and repairs, failure to adequately address vibration impacts or blasting, failure to consider unique construction facilities and equipment at the portals, failure to address local soil conditions and settlement issues, improper classification of noise impacts on the edge of Old Pasadena, an assumption that Ambassador Auditorium is only used during non-peak traffic hours with little traffic, failure to acknowledge the current poor conditions of historic properties along the tunnel route, improper assessment of the Pasadena Avenue National Register-eligible Historic District, and an inadequate post-construction survey assessment. Because of the inadequacy of the SR-710 Project historic resource impact assessment, as well as extraordinary inadequacies in tunnel analyses on other subjects (e.g. air quality, water use and quality, cumulative impacts, etc.), the tunnel analyses should not be certified as part of the FEIR/FEIS.

Moreover, the MOA fails to state that the tunnel alternatives are infeasible under Section 4f of the Department of Transportation Act of 1966. This act declares that special efforts should be made to preserve historic sites. It says that projects can only go forward if

- o There is no prudent and feasible alternative to using that land, and
- o The program or project includes all possible planning to minimize harm to the....historic site resulting from the use.

The tunnel alternatives do not meet either one of these criteria. First, there is a clear alternative to the tunnels in the TSM/TDM proposal. Second, the completely inadequate historic impact assessment and mitigation plans presented in the DEIR/DEIS, FOAE and FRDEIR/FSEIS show that all possible planning to minimize harm have not been performed.

Recommendation: The MOA should add wording that the tunnel alternative analyses are inadequate and should not be certified in the FEIR/FEIS, and that the tunnel alternatives are infeasible under Section 4f of the Department of Transportation Act of 1966.

3. If the tunnel environmental analyses are certified in the Final EIR (FEIR) / Final EIS (FEIS) and the tunnels are selected for implementation at a later time, the impacts to historic properties will not be understood and cannot be properly mitigated.

In the paragraphs above, we have described our concerns that

- Even if the TSM/TDM is selected as the 'preferred alternative', the tunnel alternatives may be selected at a later time if the tunnel analyses are certified.
- The impact assessment and mitigation plans for the tunnel alternatives are completely inadequate.

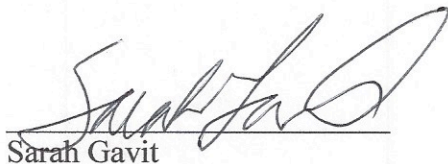
Consequently, in the event that a tunnel alternative is considered for later implementation, it is imperative that the current environmental analyses and supporting adverse effects documentation not be used. A new environmental impact process for the tunnels needs to be performed. It is especially important to document this need for future administrators, politicians and impacted parties, who will unlikely retain the detailed knowledge gained by those currently involved in the environmental impact process.

Recommendation: The MOA should add wording that if the tunnels are considered for implementaiton at a later time, a new enviornmental impact process will need to be performed.

The WPRAs look forward to concurring with the MOA document, once the above concerns are addressed.

Thank you for considering our comments.

Sincerely,



Sarah Gavit
WPRAs Board Member, SR 710 Lead
SR-710 Section 106 Consulting Party Member

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