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**Submitted electronically**

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**RE: SR 710 North Study, Los Angeles Conservancy Comments on Draft EIR/EIS and Section 106 Draft Finding of No Adverse Effect**

Dear Mr. Damrath and Ms. Ewing-Toledo,

The Los Angeles Conservancy offers the following comments on the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) and the Section 106 Draft Finding of No Adverse Effect (FONAE) for the SR 710 North Study. Thank you for the opportunity as the Conservancy has strong concerns regarding this project, findings made to date, and the potential for numerous adverse impacts to historic and cultural resources throughout the immediate Area of Potential Effects (APE) boundaries and impacted San Gabriel Valley communities.

For more than thirty years the Conservancy has been involved with issues surrounding the 710 Freeway Extension and its impacts on historic resources. Our nearly 6,500 members throughout Los Angeles County care deeply about this issue and cherish the qualities that make the San Gabriel Valley so special. Then and now, we have been working in partnership with other community, state and national preservation organizations and local governments, including in part Pasadena Heritage, the California Preservation Foundation, the National Trust for Historic Preservation, the Natural Resources Defense Council, the No 710 Action Committee, and the South Pasadena Preservation Foundation. As a collective group, our comments on the Draft EIR/EIS overlap and share many of the same concerns, and are referenced throughout this letter so as not to unnecessarily



repeat important aspects and outstanding questions that need to be addressed.<sup>1</sup> For the purposes of this letter, the Conservancy is focusing on the Los Angeles and unincorporated East Los Angeles areas of the SR 710 North Study project.

We have repeatedly raised concerns about attempts to push through a transportation program without fully considering other options that would address greater community and regional needs. Transportation planning and improvements do not have to come at the expense of healthy and vibrant communities. Thoughtful and environmentally sustainable strategies can be implemented and chart a course that puts a priority on moving people rather than simply more cars. These measures can allow for new transit routes to be developed while also helping to strengthen neighborhoods. The proposed tunnel alternative requires careful consideration, a fully-vetted understanding and assessment of short and long-term impacts, and a thorough cost-benefit analysis to determine if this approach is smart and can be justified. Based on what is provided within the Draft EIR/EIS, we do not believe Caltrans and Metro have met this basic objective or clearly demonstrated whether the Tunnel Alternative or others will effectively reduce traffic congestion or rather shifts it elsewhere

The SR 710 North Study project must comply with multiple environmental review processes that establish different standards for thresholds and the identification of cultural resources, including thoughtful assessments of potential impacts and alternatives analysis. This includes the California Environmental Quality Act (CEQA), Section 106 of the National Historic Preservation Act (NHPA), the National Environmental Policy Act (NEPA), and Section 4(f) of the Department of Transportation. The Conservancy recognizes that Caltrans and Metro are conducting these reviews concurrently and in a parallel track, however this is resulting in a misguided and failed process. If continued, the selection of a preferred project alternative will be entirely based on inadequate analysis and false information, further exasperating the problem.

There are numerous flaws with the Draft EIR/EIS. Not all affected historic resources have been identified; notably missing are those eligible at the California and local levels whereby CEQA applies. The alternatives analysis is also inadequate and does not provide a meaningful range and consideration of other approaches, including the Nelson Nygaard's *Beyond the 710: Moving Forward – New Initiative for Mobility and Community*.<sup>2</sup> Most distressing is Metro's assertion and Draft FONEA which appears to be based on inadequate analysis of potential effects and a refusal to acknowledge real harm that can occur to historic properties as a direct result of the proposed SR 710 North Study project. Overall, Caltrans is negligent in delegating its primary legal responsibility for environmental review to another agency. We believe Metro is overstepping its role in the CEQA and NEPA processes and concur with detailed analysis already submitted by the City of South Pasadena and the National Trust for Historic Preservation. This aspect alone raises a significant question regarding the validity of the overall process and worthiness of the Draft EIR/EIS and Draft FONAE. **Given all the inherent deficiencies with the Draft EIR/EIS**

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<sup>1</sup> Attachment A, Comment Matrix on Draft Finding Of No Adverse Effect for SR 710 North Study, v. 1, National Trust for Historic Preservation, August 5, 2015.

<sup>2</sup> [www.beyondthe710.org/better\\_alternatives](http://www.beyondthe710.org/better_alternatives)

**and the Draft FONAE, the Conservancy strongly urges Caltrans and Metro to withdraw this effort at this time.**

**I. The Draft EIR/EIS fails to disclose the extent and severity of impacts to historic and cultural resources**

Given the lengthy timeframe involved and massive scope of the SR 710 North Study project, the Conservancy has long advocated for forward-thinking project alternatives that would avoid significant adverse impacts on historic neighborhoods throughout the San Gabriel Valley. Both the Freeway Tunnel and the Light Rail Transit (LRT) alternatives have the potential to irreparably disrupt and/or harm stable communities and irreplaceable historic resources. At stake is a diverse collection of individual buildings and entire older neighborhoods and historic districts that are architecturally and culturally significant at the local, state and national levels, warranting a detailed and thoughtful analysis of impacts and ways to avoid or mitigate them. Further, it appears that the unincorporated areas of East Los Angeles are taking on the brunt of the potential impacts, especially in regards to the LRT Alternative. Why is an elevated alignment suggested for this section of the route versus an underground track that is proposed further north?

The Draft EIR/EIS states, “[b]ased on the preliminary Finding of No Adverse Effect [FONAE] for the State Route 710 North Study, the Build Alternatives would result in either no adverse effect or no adverse effect based on compliance with standard conditions and/or project conditions on historic properties in the APE.”<sup>3</sup> There is no substantive analysis provided within the Draft EIR/EIS that supports this finding, nor does it fully acknowledge and accurately portray this as a preliminary finding that has yet to be supported by Caltrans or other state agencies, including the California Office of Historic Preservation. It is unclear whether or not Caltrans will concur and support the FONAE by Metro. This alone demonstrates a deeply flawed and inadequate process given that the underlying basis for the entire Draft EIR/EIS is relying on the preliminary FONAE (yet prepared after the release of the Draft EIR/EIS). Failure to adequately analyze all of a project’s potentially significant impacts or provide evidence to support conclusions reached in the Draft EIR/EIS is a failure to comply with CEQA law.<sup>4</sup>

Specifically the Draft EIR/EIS and FONAE fail to identify and address a range of potential impacts, including vibration and subsidence risks and real harm that will occur to various affected historic and cultural resources (relative to different types of construction, foundations, geological conditions, and locations along the route). Historic buildings are particularly susceptible to subsidence because of their age and the construction methods used. The harm done to historic properties and the larger environment due to subsidence is well documented, most recently through the experience in Seattle and through years

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<sup>3</sup> Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings, Volume I, Page 20.

<sup>4</sup> El Dorado County Taxpayers for Quality Growth v. County of El Dorado (2004) 122 Cal. App. 4<sup>th</sup> 1591, 1597.

of devastating impacts as part of longwall undermining occurring throughout southwest Pennsylvania.<sup>5</sup> The threat is particularly pronounced in the Los Angeles area given the SR 710 Study Route project will involve complex geologic conditions and active seismic faults. The Draft EIR/EIS should fully address concerns raised by the Conservancy and others about subsidence and provide detailed analysis that indicates this issue is being taken seriously in terms of potential impacts and mitigation measures.

In addition to a lack of information and analysis provided, statements are misleading and the use of terminology is inconsistently applied (for instance “negligible,” “moderate,” “severe,” “slight,” “moderate-severe”<sup>6</sup>) or in contradiction with other statements within the Draft EIR/EIS and associated reports (including figures provided for tunnel depths relative to locations of affected historic resources).<sup>7</sup> The Draft EIR/EIS also fails to acknowledge or address case study precedents that warrant further investigation, particularly the most current example of the Seattle freeway tunnel project where a similar project scope and impacts to historic resources are clear and known to Caltrans and Metro.

CEQA requirements are clear regarding impacts, mandating that “[a] project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” A substantial adverse change in the significance of an historical resource includes “physical demolition, destruction, relocation, or alteration of the resource...”<sup>8</sup>

Statements that “[c]onstruction activities related to the Build Alternatives may result in temporary impacts including the potential for minor ground settlement”<sup>9</sup> are misleading and factually incorrect. In other sections of the Draft EIR/EIS it appears that more severe impacts are anticipated. For example, under the Avoidance, Minimization, and Mitigation Measures listed for the BRT and LRT alternatives, it states there will be an “evaluation of existing condition of historic buildings and preconstruction crack survey, vibration and settlement monitoring and documentation during tunneling and excavation activities, implementation of additional preventive/corrective measures as needed, and Vibration Monitoring Plan including vibration instrumentation, monitors, and exceedance notification and reporting procedures.”<sup>10</sup> Vibration isolation systems are also offered. If mitigation measures are identified to address the potential for damages to historic resources, it stands to reason there may be the potential for adverse impacts at a significant level, further pointing to an error in the FONAE. Why are mitigation measures offered for vibration and settlement for only the BRT and LRT alternatives? It is unclear why is this not included for the Freeway Tunnel Alternative too where there is a greater likelihood of harm to historic resources due to continuous vibration activity during construction and following subsidence. At a

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<sup>5</sup> “Sinking History: Longwall mines put holes in the past,” *Pittsburgh Post-Gazette*, November 23, 2003. <http://www.post-gazette.com/local/washington/2003/11/23/Sinking-History-Longwall-mines-put-holes-in-the-past/stories/200311230139>

<sup>6</sup> Jacobs Associates/CH2M Hill 2015 Technical Memorandum on Potential Settlement Effects on Historic Properties.

<sup>7</sup> FONAE, Introduction and Sections 5.2, 5.3; Freeway Tunnel Alternative in Jacobs Associates/CH2M Hill 2015 Technical Memorandum on Potential Settlement Effects on Historic Properties.

<sup>8</sup> CEQA Guidelines 15064.5(b)(1)

<sup>9</sup> Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings, Volume I, Page 23.

<sup>10</sup> Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings, Volume I, Page 33

minimum, there should be the same level of discussion regarding vibration and subsidence protocols due to the tunnel as the other alternatives, including analysis provided on possible post-construction scenarios.

For the BRT and LRT alternatives where vibration management is proposed, is there any pre-construction testing suggested that might lessen or prevent damage to known higher risk historic resources? How would the determination be made to use attended or unattended monitoring? Preventative measures and alerts should be implemented that are in direct correlation with acceptable thresholds (to be determined). From a community perspective, and as clearly demonstrated in Seattle, it is valuable to be able to track patterns if the project is causing more vibration and damage than originally anticipated. Is there a clear process for notifying the public should this occur?

Under the Preconstruction Building Survey measure included within the LRT Alternative, references are made to a training program for construction personnel. How will this be achieved and are there any proposed measures for securing or stabilizing at risk resources and will “preventative/corrective measures” adhere to the Secretary of the Interior’s Standards for Rehabilitation?

Only the building at 4777 Cesar E. Chavez Avenue was identified as a historic resource in the Draft EIR/EIS for the LRT Alternative for unincorporated East Los Angeles. This small structure was called out for its Art Deco architectural qualities. Yet again, the Draft EIR/EIS contradicts itself. At one point it states “the LRT Alternative improvements will not have any direct effects on the historic property.” Yet in the next paragraph it states “...under the LRT Alternative, operational impacts from groundborne noise and vibration are anticipated in the area of this historic property. The LRT Alternative improvements may result in a direct adverse effect to this historic property.”<sup>11</sup> In trying to justify impacts, it states “[t]he scale and proportion of the proposed improvements would be a considerable change from historical patterns in the area of this historic property,” yet “[i]mprovements in the vicinity of this historic property would not introduce a discordant type of visual obstruction out of scale and proportion of previous visual obstructions present historically.” This isolated example, among many others referenced by Pasadena Heritage and the National Trust for Historic Preservation, indicates that there will be direct adverse effects and significant impacts, yet no conditions are included to ensure that these effects would be in fact avoided.

In regards to impacts to the Short Line Villa Tract Historic District in El Sereno, we believe there may be additional geological risks for subsidence due to the neighborhood being located on a hillside area. The Draft EIR/EIS states “...tunnel boring-related activity under the district’s contributing elements would be virtually undetectable at the surface.” We remain concerned and question these findings given that tunnel construction will involve multiple days of continuous vibration and the lack of substantive information provided regarding the varied conditions of historic structures and their ability to withstand harm.

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<sup>11</sup> Table 3.7.3: Effects of the LRT Alternative on Historical Properties in the area of Potential Effects.

Overall the Draft EIR/EIS needs more thorough analysis of post-construction vibration as well as seismic disturbance, specifically with the Tunnel Alternative. Will Caltrans and Metro continue to monitor vibration from the BRT, LRT or Tunnel alternatives? What kind of measures will be in place to ensure that the transportation uses don't pose long-term risks to historic resources, neighborhood stability, and public safety?

Specifically in regards to the LRT Alternative, is there analysis or a basis for why an elevated alignment is suggested for this section of the route versus an underground track that is proposed further north?

**II. The Draft EIR does not comply with CEQA as it fails to identify all impacted historic resources, provide in-depth analysis, and offer a range of preservation alternatives**

Given the lack of substantive and at times contradictory information within the Draft EIR, the APE does not appear to accurately reflect and define all known historic resources. The total number of resources (both individually and contributing to historic districts) should be provided as a complete list and mapped, reflecting resources that are both applicable to NEPA as well as CEQA purposes.

The Draft EIR primarily focuses on National Register-eligible or listed sites. Yet it fails to identify important historic resources eligible (or included in a local survey) or listed at the state and local levels, as required for CEQA purposes and for the ability to properly assess potential adverse impacts. While many of the affected communities have been fully surveyed and historic resources identified, including Pasadena and South Pasadena, others have not. This is especially apparent in the unincorporated areas of East Los Angeles and El Sereno which have not benefited from comprehensive surveys of historic resources to date.

Under CEQA, “[g]enerally, a resource shall be considered by the lead agency to be ‘historically significant’ if the resource... (A) Is associated with events that have made a significant contribution to the broad patters of California’s history and cultural heritage; (B) Is associated with the lives of persons important in our past; (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (D) Has yielded, or may be likely to yield, information important in prehistory or history.”<sup>12</sup>

A key policy under the California Environmental Quality Act (CEQA) is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”<sup>13</sup> CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”<sup>14</sup> Courts often refer to the EIR as “the heart” of CEQA

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<sup>12</sup> CEQA Guidelines 15064.5(a)(3)

<sup>13</sup> Public Resource Code, Sec. 21001 (b), (c).

<sup>14</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.<sup>15</sup>

The Draft EIR appears to be based on a faulty assumption that NEPA and CEQA and an EIR and EIS are essentially interchangeable, requiring the same level of analysis to assess impacts. CEQA in fact sets the bar higher by requiring the lead agency to identify each significant effect and evaluate and adopt all feasible alternatives and mitigation measures that avoid or reduce impacts on historic resources. The Draft EIR fails in this regard as no detailed and in-depth analysis are provided. Given that other approaches exist and have been repeatedly proposed by outside interests, such as Nelson Nygaard's *Beyond the 710: Moving Forward – New Initiative for Mobility and Community*,<sup>16</sup> the Draft EIR also fails in this regard as it does not provide a meaningful range and consideration of other alternatives.

Further, the Draft EIR fails to identify all impacted historic resources. At least several historic resources are omitted from the Draft EIR which will be directly impacted by the elevated alignment of the LRT Alternative, including Belvedere Park (4914 E. Cesar Chavez Avenue); the Edward R. Roybal Comprehensive Health Center (245 S. Fetterly Avenue at Third and Mednick); and the Maravilla Handball Court and El Centro Grocery (4787 Hammel Street). All three represent historic resources that are primarily significant for their cultural associations rather than architecture, notably with the Los Angeles-area Latino/a community and heritage:

- 1) **Belvedere Park** (originally known as Soledad Park) has been the recreational heart of East Los Angeles for over seventy years, associated with Eastern European immigrants and later with the Chicano community. In 1970 it played a pivotal role in the Chicano Moratorium and protest against the Vietnam War. The Conservancy is currently in the process of having this property nominated to both the California Register and National Register of Historic Places.<sup>17</sup>
- 2) **Edward R. Roybal Comprehensive Health Center** is significant for its pioneering role in advancing broad community-based public healthcare in East Los Angeles. Completed in 1979 and known as “La Clínica de Colores,” the health center is housed in a Late Modern/Brutalist building distinguished by its concrete and multicolored tile façade. The building, which was named in honor of Congressman Edward R. Roybal, reveals the evolution of public healthcare and access in the Latina/o community of East Los Angeles, which has its origins in the Chicano Civil Rights Movement of the 1960s and ‘70s.
- 3) **Maravilla Handball Court and El Centro Grocery** is the oldest remaining handball court in the Los Angeles region. The site has a rich, layered history and continues to serve as an important community space for youth and families. It was an important social center for the multi-ethnic Maravilla community from 1928 through 1989. The store, handball court,

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<sup>15</sup> *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

<sup>16</sup> [www.beyondthe710.org/better\\_alternatives](http://www.beyondthe710.org/better_alternatives)

<sup>17</sup> [www.laconservancy.org/locations/belvedere-park](http://www.laconservancy.org/locations/belvedere-park)

and activities that took place there were a focal point for the community. In 2012 the Maravilla Handball Court and El Centro Grocery was listed on the California Register of Historical Resources.<sup>18</sup>

The omission of these and other resources from the Draft EIR is egregious and needs to be corrected, in addition to fully assessing the potential range of adverse impacts, including aesthetics, construction, noise, public health concerns, traffic congestion, and vibration. The Maravilla Handball Court and El Centro Grocery, in particular, will be directly impacted as the elevated alignment will run in front of the building along Mednick Avenue. While the Draft EIR acknowledges this block as being an important civic hub and containing a key view that would be affected by the LTR Alternative, it fails to identify the building or acknowledge it as a California Register-listed historic resource.

The Draft EIR also fails to identify the local and potential California Register-eligibility of two residential neighborhoods in El Sereno for the purposes of CEQA review. Only the National Register-eligible Short Line Villa Tract Historic District is identified in the Draft EIR/EIS. Missing are the **Berkshire and Sheffield Avenue neighborhoods**. The City of Los Angeles has not yet fully surveyed El Sereno as part of their multi-year SurveyLA initiative. Only the Berkshire neighborhood in El Sereno has been evaluated to date by the City of Los Angeles, as part of the planning and consideration for local historic district designation (Historic Preservation Overlay Zone HPOZ)<sup>19</sup>. Architectural Resources Group, Inc. recently submitted a re-evaluation of the Berkshire neighborhood.<sup>20</sup> One hundred and fourteen structures are included within the proposed HPOZ, with seventy-eight found to be contributing resources and thirty-six are non-contributing.

Until recently the Sheffield Avenue neighborhood was previously identified as a National Register-eligible historic district. When identified in October 2007 by Caltrans, the district contained one-hundred-and-eighty-three properties of predominantly single-family homes, whereby ninety-five percent of the buildings were rated as contributing resources. It was determined eligible for listing in the National Register under criterion C, at the local level of significance, and for the California Register under criterion 3. Though it is not entirely clear why or what promoted this action, Caltrans reevaluated the area in December 2014 and determined it was no longer eligible for the National Register. The Conservancy is concerned about the process and change in status. The area has not experienced significant change or a reduction in the number of overall contributors to the identified historic district. Further, at the very least, we strongly believe this neighborhood is eligible locally and for the California Register as a historic district. It retains an extraordinarily-high degree of integrity, much higher than typically found in most historic districts either at the local, state and national levels.

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<sup>18</sup> "Inspiration Court Order." *Preservation* magazine, Spring 2013. [laconservancy.org/locations/maravilla-handball-court-and-el-centro-grocery](http://laconservancy.org/locations/maravilla-handball-court-and-el-centro-grocery)

<sup>19</sup> Council District 14 Motion to initiate HPOZ proceedings, February 26, 2014

<sup>20</sup> Berkshire Historic Resources Survey Report DRAFT, Prepared for City of Los Angeles, Department of City Planning, Office of Historic Resources. Architectural Resources Group, Inc. July 9, 2015.



In addition to individual resources cited above, the Conservancy strongly believes both the Berkshire and Sheffield Avenue neighborhoods should be identified and treated as historic resources within the Draft EIR, for the purposes of CEQA. These and the individual properties cited above appear to meet CEQA Guidelines as being “historically significant” and eligible for both local and/or California Register listing. This omission is a serious mistake and further illustrates the inadequacy of the Draft EIR.

Overall, we believe it is incumbent upon Caltrans and Metro and their responsibility to fully identify **all** historic resources within the unincorporated areas of East Los Angeles and El Sereno. Over the years these communities have suffered a disproportionate loss of heritage through previous transportation initiatives and a lack of resources. This includes the County of Los Angeles which has yet to establish a historic preservation program. The identification of historic resources cannot be relegated to a typical windshield or visual survey, especially given this community’s rich cultural heritage and associations. Caltrans and Metro need to do undertake a more comprehensive effort and work closely with the community to identify sites that are also significant predominantly for their cultural associations. Given that the Conservancy was easily able to identify several important historic resources that were overlooked, even one listed on the California Register, it stands to reason that others are also not included within the Draft EIR/EIS.

### **III. Conclusion**

The Conservancy is very concerned that the unincorporated areas of East Los Angeles and El Sereno are taking on a disproportionate environmental impact and burden of the proposed SR 710 North Study project, in part due to an inability by Caltrans and Metro to fully identify all of the affected historic resources and assess their potential impacts. Specifically in regards to the LRT Alternative, we question why an elevated alignment is suggested for this section of the route versus an underground track that is proposed further north.

The Conservancy has serious concerns with the Draft EIR/EIS and Draft FONAE, beginning with the fact that Caltrans has incorrectly delegated its primary legal responsibility to Metro for environmental review. We believe the Draft EIR/EIS and Draft FONAE are inadequate and flawed, failing to provide necessary and substantive analysis, offering misleading and contradictory findings, and lacking key information required by both independent NEPA and CEQA environmental review processes. We strongly urge Caltrans and Metro to reevaluate its procedures, work closer with affected community partners, and withdraw the Draft EIR/EIS at this time.

#### **About the Conservancy:**

The Conservancy is the largest local historic preservation organization in the United States, with over 6,500 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education. Because of the Conservancy’s knowledge of and concern about the historic properties potentially affected by this project, we believe we can provide important information and a valuable perspective as a consulting party under Section 106.

Thank you and please let me know if the Conservancy can be of any assistance or if you have any questions. Please feel free to contact me at [afine@laconservancy.org](mailto:afine@laconservancy.org) or 213-430-4203.

Sincerely,



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